



# Privacy Policy

Vasco Trustees Limited

ACN 138 715 009

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# 1. ABOUT VASCO TRUSTEES

Vasco Trustees Limited (**Vasco**) is part of a fund services group that provides responsible entity, trustee, fund administration and distribution services to Australian and international investment managers. Vasco also provides strategic advice, back-office support, product development and compliance services to assist investment managers in delivering competitive investment returns and quality service to their clients whilst achieving their business growth objectives.

This Privacy Policy applies to Vasco and all its related entities.

# 2. VASCO PRIVACY POLICY

At Vasco we recognise the importance of safeguarding your privacy and are committed to protecting your privacy and safeguarding your personal information.

Vasco is committed to complying with the Australian Privacy Principles which set the standard for how organizations should deal with personal information. The Australian Privacy Principles (the **APPs**) are set out in the *Privacy Act 1988* (Cth) (the **Act**). Australian members of our company are bound by the Act and the APPs, upon which this policy is based.

Effective implementation of this policy and procedure will help ensure that investor confidence in the integrity of Vasco is maintained.

# 3. SCOPE OF VASCO PRIVACY POLICY

This policy is authorised by Vasco Trustees Limited ABN 71 138 715 009 (**Vasco**) and its Australian related entities.

# 4. THE INFORMATION WE COLLECT

Whenever it is reasonable and practicable to do so, we only collect information about individuals directly from individuals.

The type of information collected by us will depend upon your relationship with Vasco and may include:

- name and title
- address
- contact details
- detail on entities through which you invest
- date of birth
- bank account details
- employment details
- citizenship

- detail on your nominated beneficiaries (for friendly society bonds)
- shareholding details (for shareholders in Vasco Investment Managers Limited)
- Australian Tax File Number.

In most cases, and wherever possible, Vasco will try to collect personal information only from you. Information will be collected through various company forms and from you directly, either in writing or verbally.

Personal information is information or an opinion about you from which you can be reasonably identified. Vasco collects personal information so that we can provide you with our products and services and comply with our legal obligations such as those under superannuation laws, taxation laws and the Anti-Money Laundering and Counter-Terrorism Financing Act. If Vasco does not collect your personal information, we may not be able to provide you with a product or service.

We do not generally collect sensitive information about individuals unless required by applicable laws or rules. Sensitive information includes information relating to:

- race
- political or religious beliefs
- sexual preferences
- criminal convictions
- membership of professional or trade associations or unions
- health information

We also collect personal information from people who submit applications or register interest for employment with Vasco.

In addition, we may collect personal information about individuals who are not customers of Vasco (e.g. business contact details of a company representative with whom we deal).

Depending on how you choose to interact with us, we may collect your personal information when you contact us or our service providers by telephone, by email, through our web site, complete an application or registration form, or when you meet one of our representatives face to face.

Vasco may also collect information about you from third parties. For example, Vasco may collect personal information from:

- your authorised representatives and advisor(s)
- our service providers
- your employer, or
- our corporate clients, where we are providing services to them.

## 4. HOW YOUR INFORMATION IS HELD

Your personal information is held in our registry systems for our investors and shareholders.

Generally personal information is stored electronically with hard copy records retained and archived with an archival service provider.

All internal systems are subject to the security measures detailed in this policy. All external service providers are contractually required to hold personal information in accordance with the Act.

Vasco takes all reasonable steps to ensure your information is protected from loss, unauthorised access or disclosure.

## 5. HOW INFORMATION IS USED

Vasco collects personal information about you primarily:

- to provide you with the products and services you request
- to provide you with the information you request
- to verify your identity before transactions are processed, your instructions are carried out, or providing you with information about your investment
- to administer your financial product
- to provide you with information about other products or services offered by Vasco or its related entities
- to respond to your enquiries or complaints
- to satisfy any legal requirements.

Laws and rules regarding the use of personal information may vary by jurisdiction. Vasco complies with applicable laws and rules in the related jurisdiction.

We may also collect, use and exchange your information in other ways where permitted by law.

Vasco does not sell, rent or trade personal information to or with third parties.

## 6. ANTI-MONEY LAUNDERING AND COUNTER TERRORISM LEGISLATION

The *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* (**AML/CTF Act**) is aimed at addressing money laundering in Australia and the threat to national security caused by terrorism. This legislation requires us to collect identification information from investors into our investment products and reverse mortgage borrowers and to verify your identity from original or certified copies of specified documents. Details of what identification information and documentation you are required to provide are set out in transactional based forms. We may also contact you to follow up and clarify certain information.

Under this legislation we are also required to monitor transactions to identify any suspicious activity within any of our investment products.

As required under the AML/ CTF Act, we may, in our absolute discretion, without notice to you, disclose or otherwise report details of any transaction or activity, or proposed transaction or activity (including any personal information) to the relevant reporting body.

## 7. DISCLOSURE OF PERSONAL INFORMATION

Vasco does not sell, rent or trade personal information to, or with, third parties.

In some circumstances your information may be disclosed to Vasco's related entities or service providers that perform a range of services on our behalf, such as:

- outsourced service providers including administration, custodial and registry service providers, printers and mailing houses, and information technology systems
- solicitors, accountants, real estate agents or other advisors to provide professional advice to in relation to one of our services
- investment managers or other financial institutions to facilitate an investment
- software providers, actuaries, professional advisers and research organisations
- business partners, including insurance underwriters
- government agencies including APRA, ASIC, AUSTRAC, Centrelink or the ATO
- financial intermediaries such as financial planners
- related companies.

Where Vasco contracts with an outsourced service provider or business partner we take reasonable steps to protect the privacy of any information disclosed to them. This includes inserting confidentiality provisions and a requirement to comply with the Act in our contractual arrangements.

Some of the third parties to whom we disclose your personal information may be located outside Australia. For example, we may disclose your personal information to external national or overseas facilities in the course of conducting information and data processing, back up and scanning or for the purposes of obtaining other services from third parties

## 8. DECLINING PRODUCT OR SERVICE OFFERS (OPTING-OUT)

From time to time Vasco may wish to use your information to tell you about other products, services or special events or offers that we think may be of interest to you. Please let us know if you do not want to receive these offers by contacting us using the contact details noted below.

## 9. QUALITY OF INFORMATION

Vasco aims to ensure that the personal information we retain about you is accurate, complete and up to date. Please provide us with complete and accurate information and keep us informed of any changes in your details such as a change of address.

If you do not provide all or part of the personal information that we request we may not be able to contact you or to administer your investment properly.

If you believe that the information, we hold about you is inaccurate please contact us directly using the contact details provide below, so that we can update our records.

## 10. SECURITY OF INFORMATION

Vasco will at all times take reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. Your personal information is treated as confidential.

Employees and contractors of Vasco are bound by confidentiality obligations.

We may store your files in hard copy or electronically in our ordinary IT systems. These may include Australian-based cloud servers or the servers of third parties within Australia.

We implement a range of physical and electronic security measures to protect the personal information that we hold including password controls, firewalls and virus protection.

All premises housing our systems and other copies of your information are monitored and protected by security alarms and access card or key lock entry.

Service providers who hold personal information are contractually required to hold information in accordance with the Act and Vasco obtains periodic confirmation of adequate information security management.

## 11. YOUR RIGHTS OF ACCESS AND CORRECTION

You are entitled to obtain access to your personal information subject to some exceptions allowed by law. You may also request that Vasco correct or update information that we hold on you. We encourage our customers to ensure that their personal information is accurate and up to date, particularly mailing address and contact details. We include regular reminders in correspondence with our customers.

If you wish to make a request for access to your personal information please contact us using the contact details below.

## 12. DATA BREACHES AND VASCO'S RESPONSIBILITIES

In addition to its obligations under the Act and the APPs, Vasco is also subject to the *Privacy Amendment (Notifiable Data Breaches) Act 2017* (Cth) which established the Notifiable Data Breaches scheme (**NDB Scheme**) in Australia in February 2018.

In response to the NDB Scheme, Vasco has developed a Data Breach Response Plan to ensure it can perform a prompt and thorough assessment of any suspected data breaches which may occur.

Under the NDB Scheme, Vasco may be obliged to notify you and any other individual whose information has been compromised by a data breach incident, and report the matter to the Australian Information Commissioner.

For further information on the NDB Scheme and other relevant privacy laws, please visit [www.oaic.gov.au](http://www.oaic.gov.au)

## 14. COMPLAINTS

If you have a complaint related to how Vasco has managed your personal information, please contact our Privacy Officer, whose details are set out in Section 16.

Vasco will consider your complaint and respond in the manner detailed in our Dispute Resolution Guide (if you are a retail investor) or in the manner set out in your offer document (if you are a wholesale investor) or otherwise within 30 days.

If your complaint is still not satisfactorily resolved, you may consider lodging a [\*Privacy Complaint Form\*](#) with the Office of the Australian Information Commissioner. For more information, please visit the [Australian Information Commissioner's website](#).

## 15. CHANGE TO POLICY

From time to time it may be necessary for us to review and revise our privacy policy. We reserve the right to change our privacy policy at any time.

The Board will review and approve any changes to the Privacy Policy.

## 16. CONTACT DETAILS

If you have any questions about this privacy policy, if you wish to complain about how we handled personal information about you, or if you wish to access or correct your personal information, please contact Vasco's Privacy Officer by calling **+61 8352 7120** from **8.30am to 5.30pm** (Melbourne time), **Monday to Friday**, or using the follows address details:

*The Privacy Officer  
Vasco Trustees Limited  
Level 4, 99 William Street  
Melbourne VIC 3000*