

Australian Foundation Investment Company Limited - Privacy Policy

Our commitment to privacy

Australian Foundation Investment Company Limited (AFIC, we, our, us) and its related bodies corporate respect and are committed to protecting your privacy. This document is our privacy policy which sets out how we collect, use, disclose and handle your personal information.

AFIC will comply with the Australian Privacy Principles (APPs) contained in Schedule 1 to the *Privacy Act 1988* (Cth) (Privacy Act) when dealing with personal information. For further information about the APPs, you can visit the Office of the Australian Information Commissioner's (OAIC) website at www.oaic.gov.au.

What is personal information?

Under the Privacy Act, 'personal information' refers to any information that can be used to personally identify you. This includes your name, address, telephone number, email address and financial information (eg, bank account details or tax file numbers). Any information we collect which identifies you personally, or from which you are reasonably identifiable, will be treated by us as personal information.

What personal information does AFIC collect and why?

There are a number of situations in which it is necessary for us to collect personal information about security holders and other people associated with the companies that we deal with (such as directors).

Directly from you

We may collect and hold personal information from our security holders and employees such as:

- names;
- addresses;
- e-mail addresses;
- phone numbers;
- bank account details;
- tax file numbers; and
- details of security holdings.

From our related bodies corporate and other entities

AFIC, through its related bodies corporate, including Australian Investment Company Services Limited (AICS), has arrangements with a number of other listed investment companies to which AICS provides administrative services and support. Provision of these services may involve the collection and use of personal information (of the types described above) about the security holders of those companies.

The Company has appointed Computershare Investor Services Pty Ltd ACN 078 279 277 (Computershare) to act in the capacity of our share registrar. In this role Computershare collects personal information from our shareholders on the Company's behalf (and the Company receives this information from Computershare). Computershare has its own privacy policy, which is publicly available on its website at <https://www.computershare.com/au/privacy-policies>.

What if we cannot collect your personal information?

If AFIC or its related bodies corporate are unable to collect the personal information described above, they may not be able to provide the administration and support services to their security holders, or comply with their obligations as required by law or regulation.

How do we use personal information?

The primary purpose for which this information is collected is to enable security holders' holdings to be maintained and administered efficiently and to enable AFIC and its related bodies corporate to comply with its legal and regulatory obligations. In particular, the information may be used in connection with one or more of the following:

- maintenance of share registers as required by the *Corporations Act 2001* (Cth);
- preparation of security holder reports and internal management reports;

- distribution of financial results, annual reports and other corporate communications to security holders;
- distribution of payments to security holders;
- compliance with legal and regulatory requirements;
- receiving and responding to security holder queries; and
- any other purpose required or authorised by law or other regulation.

AFIC, through AICS, also collects and holds personal information about AICS employees. We may rely on exceptions in the Privacy Act relating to the handling of employee information.

Disclosure of personal information

We store all data securely in Australia. However, as part of our business operations, or to comply with our legal or regulatory obligations, we will sometimes disclose personal information to third parties, such as to:

- the share registry, maintained by Computershare Investor Services Pty Ltd; and
- third party contractors who provide printing and mailing services, including MailChimp.

We use MailChimp to provide you with e-mail updates. When you subscribe to receive these updates from us, we will typically provide your email address and related account information to MailChimp to enable it to carry out its email marketing services for us. MailChimp is based in the United States and stores information it collects from third parties, including us, on servers located outside of Australia. You can opt out of our mailing list, including receiving our e-mail updates via MailChimp, by clicking on the 'unsubscribe' link provided in every email and following the prompts. For further information about the types of personal information MailChimp collects, and its data handling practices generally, please refer to MailChimp's privacy policy, available on its website at <https://www.intuit.com/privacy/statement/>.

AFIC may also combine, aggregate, analyse, or share any information that it collects from security holders with information collected by any of AFIC's related bodies corporate, including AICS. We will never sell your personal information to third parties.

Direct Marketing

AFIC and its related bodies corporate may use the personal information we collect from security holders for marketing purposes, including marketing other funds that AFIC or its related bodies corporate manage or administer to security holders in any of our administered or managed funds.

These communications may be sent in various forms, including mail, SMS, email, and telephone. Any communications will be sent in accordance with applicable marketing laws, such as the *Spam Act 2003* (Cth). Recipients may opt-out of receiving marketing communications from us by contacting us at any time (see the contact details below), or by using the opt-out or unsubscribe facilities provided in the marketing communication themselves.

How we secure your personal information

Protecting your personal information is important to us. We take reasonable steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification or disclosure. To accomplish this, we use a number of physical, administration and personnel security measures. In addition, we limit staff access to personal information and we restrict access rights to a small number of staff that are required to have access to perform their roles.

Accessing and correcting personal information

We aim to keep the personal information that AFIC and its related bodies corporate collect, use or disclose as accurate, complete and up to date as possible. We need your help to do that. If you think that the information we hold about you is inaccurate, incorrect or incomplete please contact our Privacy Officer (using the contact details below) and we will take reasonable steps to ensure that it is corrected. Where we hold information that you are entitled to access, we will try to provide you with suitable means for accessing it (for example, by mailing or emailing it to you). There may be instances where we cannot grant you access to the personal information we hold. For example, we may need to refuse access if granting access would interfere with the privacy of others. If that happens, we will give you the reasons for any refusal.

We may charge you a reasonable fee to cover our administrative and other reasonable costs in providing access to your personal information. We will not charge a fee for simply making an access request.

Once an amendment request has been made, we will consider if the information requires amendment. If we do not agree that there are grounds for amendment, then you may request that we add a note to the personal information stating that you disagree with it.

We will not charge you for making a request that your personal information be corrected, for correcting your personal information or adding a note to the personal information that we hold stating that you disagree with it.

Complaints about a breach of privacy

If you have questions about this Privacy Policy, our handling of your personal information or believe your privacy has been breached, please contact our Privacy Officer using the details set out below.

We will treat your requests or complaints confidentially. An AFIC representative will contact you within a reasonable time after receiving your communication to discuss options for proceeding with your query (as required), or for addressing your complaint. We will aim to resolve your complaint in a timely manner as appropriate in the circumstances.

If following our own complaints process you are unhappy with how we handled your concerns, you may lodge a complaint with the OAIC. For further information regarding how to make a complaint to the OAIC, you can visit <https://www.oaic.gov.au/privacy/privacy-complaints>.

Contact Us

If you have any questions about this privacy policy, any concerns or a complaint regarding the treatment of your personal information or a possible breach of your privacy, please contact our Privacy Officer at:

Privacy Officer
Australian Foundation Investment Company Limited
Level 21, 101 Collins Street
Melbourne, 3000, Australia
Phone: (03) 9650 9911
Email: privacyofficer@afi.com.au

The AICS privacy policy is available on request from:

Privacy Officer
Australian Investment Company Services Limited
Level 21, 101 Collins Street
Melbourne, 3000, Australia
Phone: (03) 9650 9911
Email: privacyofficer@afi.com.au

Paper copies of both policies are available free of charge on request from the Privacy Officer (using the contact details provided above).

Changes to this Privacy Policy

We will update this Privacy Policy where necessary to reflect changes in applicable laws or in our privacy compliance practices and will take reasonable steps to ensure any updated version is posted on our website at <https://www.afi.com.au/privacy-policy>.

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