

Privacy Policy

Approved by the Chief Operating Officer
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Privacy Policy

The Privacy Act 1998 (Cth)

Bell Asset Management Limited (BAM) is bound to protect your personal information in accordance with the Australian Privacy Principles (APPs) to the extent required by the Privacy Act 1988 (Cth) (the Act) as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)*. In addition, the Office of the Australian Information Commissioner (OAIC) may issue guidelines regarding acts or practices that may have an impact on the privacy of individuals. More information about the Act can be obtained from www.oaic.gov.au.

This document

This document gives information on how we protect the personal information we hold about you. We aim, in adopting this policy, to ensure that we protect your rights, and observe our obligations.

This policy will be reviewed from time to time to account for new laws, changes to our technology, operations and practices and to ensure that it remains appropriate to the changing environment.

Types of information that can be collected

The Act defines personal information as information or an opinion whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent or can reasonably be ascertained from information or opinion.

The kinds of personal information we collect and hold may include your name, contact details and other information such as your tax file number and bank account details. We may also collect information such as your gender, date of birth and other identifying information as required by the Anti-Money Laundering and Counter Terrorism legislation. Other information may be collected from third parties by virtue of the investments we may administer for you.

Sensitive information is a category of personal information, which is subject to additional restrictions and safeguards. Sensitive information includes matters relating to a person's racial and ethnic origin, political opinions or membership of political bodies, religious beliefs or affiliations, membership of a professional or trade union organization, sexual preferences or activities, criminal record, state of health and medical history. It is not our practice to collect sensitive information, but some sensitive information (e.g. relating to criminal history, criminal associations or political exposure) may be collected in conjunction with our Anti Money

Laundering (AML) checks. This information is restricted for use in the AML function, is not used for any other purpose, and has specific "need to know" access constraints and subject to separate data storage.

How we collect and hold personal information

We may collect your personal information from a variety of sources, such as when you complete an application for an investment or use one of our standard forms; in writing or via telephone or email; or from third parties such as your financial adviser, accountant or a publicly maintained record or service provider. We generally collect information directly from you but will use other sources where it is not reasonable and practical to collect it directly from you.

We may store your personal information in a variety of formats including in hard copy; and in electronic copy and databases. Access to your personal information is restricted to staff needing access to administer your investment and customer relationship and for marketing purposes. We use reasonable measures to protect your personal information, such as restricting access to staff and service providers needing access to perform their duties; implementing appropriate physical and electronic security measures in our offices and information technology infrastructure; and training staff on this policy.

Why we collect the information

Personal information is collected so that BAM may:

- Verify your identity;
- Administer our customer relationship;
- Monitor and evaluate our investment services and products;
- Assist investors with queries;
- Take measures to detect and prevent fraud;
- Provide reporting to competent authorities such as tax regulators in Australia and overseas;
- Comply with our legal obligations under applicable laws and regulations; and
- Market itself and its products to existing and prospective investors and provide updates about activities and promotional material which may be of interest to investors and prospective investors.

What if you provide incomplete or inaccurate information?

If you do not provide BAM with required information or the information is inaccurate, the following may occur:

- We may not be able to provide you with the products or services you are seeking;
- Withholding or other taxes may be withheld at a higher rate than would otherwise be the case;
- We may give information about you to the Australian Taxation Office or other interested government authorities;
- We may forcibly redeem your holding in one of our funds if your decision not to provide information exposes the fund to risk; and/or
- We may form a view that your decision not to provide the information is suspicious and report our suspicion to AUSTRAC, Australia's Anti Money Laundering Regulator.

Consent

The main purpose of BAM collecting your information is to facilitate your holding in one or more of the investments we manage. Our offer documents set out in more detail the way your information may be used. The terms of each of our funds and the type of information you may be sent, is set out in each Product Disclosure Statement or Information Memorandum. By signing the relevant application for an investment you consent to BAM using your personal information. Having provided us with your consent, you are able to withdraw it at any time; however please note that withdrawing your consent may lead to us no longer being able to provide you with the service or product you enjoy.

Disclosure to third parties or as required by law

We may need to give your information to third parties where, for example, we outsource administrative and other functions.

We may be required or authorized by or under law in different jurisdictions to disclose information. We may also be required by a Government agency or regulator to produce information or records, for example in relation to taxation.

We may, in administering your investment or our investment products, disclose your personal information to third parties in the United States of America. Where we do so, or in the event that any other off-shore disclosure is considered, we will use our best endeavours to ensure that the third parties comply with the Act.

Accurate and correct

BAM takes all reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. Please contact us using the contact details at the end of this document if any of the details you

have provided change or you believe the information held is incorrect.

The APPs place some restrictions on you accessing your personal information. These include where:

- the provision of access would have an unreasonable impact on the privacy, or would pose a serious and imminent threat to the health or safety, of any individual;
- the request for access is frivolous or vexatious; or
- the provision of access is unlawful or would be likely to prejudice a criminal investigation.

If we decline your request for access, we will provide you with an explanation for that refusal.

Contact us

If you have any questions, have a privacy complaint or would like further information about our privacy information handling practices please contact us via:

Privacy Officer

Bell Asset Management Limited

Level 20, 101 Collins Street
MELBOURNE VIC 3000

Telephone: +61 3 8637 6000

Email: info@bellasset.com.au

If you have a privacy complaint, we will endeavor to acknowledge receipt immediately and seek to investigate it and respond within 45 days. We will generally handle privacy complaints consistently with our approach to resolving financial services complaints lodged with the Financial Ombudsman Service Limited (FOS); however in our context the dispute resolution process managed by FOS does not cover complaints about privacy. If you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner by contacting 1300 363 992 or by visiting www.oaic.gov.au.