

Colonial First State Investments Limited Privacy and the Information Handling Practices

Colonial First State Investments Limited ABN 98 002 348 352, AFS Licence 232468 (Colonial First State) is the issuer of super, pension, and investment products. This policy will apply to investors who have investments in these products.

Privacy Policy Statement



Background

This document

This document dated 1 June 2011 gives information on how we protect the personal information we hold about you. It also includes information on how the Commonwealth Bank Group (of which Colonial First State is a wholly owned but non guaranteed subsidiary) protects personal information. The aim of the Colonial First State privacy policy is to give you comfort that the personal information you provide to us will be kept in the strictest confidence. We acknowledge that circumstances may change and our policy will be reassessed accordingly.

National Privacy Principles

The National Privacy Principles which are set out in the Privacy Act 1988 and implemented the National Privacy Principles, which include provisions that regulate the way private sector organisations collect, use, disclose, keep secure and provide access to personal information. Colonial First State is bound to protect your personal information in accordance with the National Privacy Principles, to the extent required by the Privacy Act 1988.

Collection of personal information

What is 'personal information'?

Under the Privacy Act 1988 personal information is 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 the information or opinion.

Why we collect information

Personal information is collected so that we may:

- administer our customer relationships
- make and maintain investments for a customer of Colonial First State (and the Group) funds and, unless the customer tells us otherwise, to provide information on other products and services offered by Colonial First State and the Group, and
- comply with our legal obligations.

We may use personal information for purposes such as:

- monitoring and evaluating products and services
- statistical, prudential, risk management, actuarial and research purposes
- assisting customers with queries
- marketing and
- taking measures to detect and prevent frauds, identity theft, money laundering or other illegal activities.

What we collect

Colonial First State collects the personal information of investors (and, where relevant, persons who act on their behalf) via application forms, other Colonial First State forms, phone, fax, email and online.

Personal information collected from investors include:

- name
- date of birth
- contact details

- gender
- Tax File Number, exemption reason or country of residence
- bank account information
- investment information
- employment information
- health information
- login details for FirstNet
- information to respond to FirstNet technical difficulties and
- responses to surveys.

We also collect information on investors other than individuals such as companies, partnerships, trusts, associations and cooperatives. The information we collect will vary depending on whether you are an individual or organisation.

We may also collect personal information when you request information on our products or if your employer includes your information in an application for FirstChoice Employer Super.

Certain laws such as the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) also require us, where it is necessary, to establish your identity (and, where relevant the identity of other persons associated with your investment with us) by collecting personal information and taking steps to verify some or all of this information we collect. During the course of your dealings with us, we may also collect and verify further information about you (as well as other persons who act on your behalf or who are associated with your investment) to comply with these laws.

What if you provide incomplete or inaccurate information?

We may not be able to provide you with the products or services you are seeking.

Disclosing information

Who we may disclose information to (this includes, but is not limited to, the following persons):

- any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee or guardian, as long as you have told us or we have established that this person is authorised to act on your behalf
- auditors we appoint to ensure the integrity of our operations;
- regulatory bodies and government agencies (if required or authorised to do so)
- insurance underwriters if you have requested insurance through us (including claims investigators, reinsurers and insurance reference bureaux)
- medical practitioners (to verify or clarify, if necessary, any health information you may provide)
- any persons who have provided margin loans on (or taken security in relation to) your account
- other Group companies for prudential and risk management purposes and so that the Group can have access to an integrated view of the relationship and
- third party applies.

In all circumstances where personal information may become known to our third party suppliers, there are confidentiality arrangements in place. Contractors, agents and outsourced service providers are not able to use or disclose personal information for any purpose other than our own. The Group

takes its obligations to protect customer information very seriously and we make every effort to deal only with parties who share and demonstrate the same attitude

Consent

The main purpose for Colonial First State collecting your information is to make and maintain an investment, on your behalf, in Colonial First State funds where we are the responsible entity or trustee. Our offer documents set out in more detail the way an investor's personal information is used. The terms of our offer and the type of information we will send you are set out in each Product Disclosure Statement. By making an investment, you consent to the way we use and disclose your personal information. If you do not wish to receive any further information about the products and services provided, you can let us know by calling 13 13 36 or by emailing contactus@colonialfirststate.com.au.

Withdrawing consent

Having provided consent, you are able to withdraw it at any time. To withdraw consent, please contact Colonial First State. Please note that withdrawing your consent may lead to Colonial First State no longer being able to provide you with the product or service you enjoy, given that it is impracticable for us to treat some customers differently. For example we have made arrangements to have all statements mailed by all external providers and we cannot amend this arrangement.

Disclosure required by law

We may be required or authorised by law to disclose information eg under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter terrorism financing. We may also be required by a Government Agency to produce information and records.

Disclosure as a result of your actions

There may be circumstances in which we consider you, by your actions, to have released us from our duty of confidentiality or to have consented to the disclosure of information about you without actually saying so (for example, if you discuss your financial position publically to the media, in such a way as to leave us with little alternative but to respond publically).

Personal information quality

Our goal is to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. Please contact us by calling our Service Centre on 13 13 36, or e-mailing us at contactus@colonialfirststate.com.au, if any of your personal details change. Please also contact us if you believe that the information we have about you is not accurate, complete or up-to-date.

Personal information security

We are committed to keeping secure the personal information you provide to us. We take all reasonable precautions to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure.

We have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

Our security measures include, but are not limited to:

- educating our staff as to their obligations with regard to your personal information
- restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access
- requiring employees to use unique passwords to gain access to systems. These passwords are changed regularly and their use is independently monitored
- encrypting data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks
- employing firewalls, intrusion detection systems and virus scanning tools to prevent unauthorised persons and viruses from entering our systems
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing
- providing secure storage for physical records and
- employing physical and electronic means such as alarms, cameras and guards (as required) to protect against unauthorised access to buildings.

Where information we hold is identified as no longer needed for any purpose we take reasonable steps to effectively and securely destroy it.

Online services

Collection of information via web site activity

For statistical purposes we collect information on web site activity (such as the number of users who visit our web site, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering our web site from another web site, the address of that web site) through the use of 'cookies'. This information on its own does not identify an individual but it does provide us with statistics that can be used to analyse and improve our web site. We may also collect your personal information via your use of our web site. Generally, the information that we collect is what you give us when you complete a form or otherwise make an enquiry or transaction via the web site.

To evaluate the effectiveness of our web site advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions.

Cookies

A 'cookie' is a packet of information that allows the server (the computer that houses the web site) to identify and interact more effectively with your computer.

When you use our web site, we send you a temporary cookie that gives you a unique identification number. A different identification number is sent each time you use our web site. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider (ISP).

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our web sites.

Links to other web sites

Our web site may contain links to non-Colonial First State web sites. While such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours. You should review any privacy policies on those linked websites. We are not responsible for any linked websites.

Telephone services

We may monitor and record telephone calls for training, account management and security purposes.

Changes to our privacy and information handling practices

Colonial First State may make changes to our privacy and information handling practices from time to time for any reason. We will publish those changes on our web site and, if there are important changes or a lot of minor changes, we will update this document.

Access to personal information

You can request us to provide you with access to the personal information we hold about you. In most cases, your personal information is accessible to you via:

- written request
- fax request
- phone request and
- FirstNet access.

We have processes and procedures in place for the correction of any errors brought to our attention. All procedures involve the identification of the investor through security checks.

If you complete a survey for us, we may keep the information you provide to improve our services and products.

Jointly held information

Where we hold your personal information in conjunction with that of another individual or individuals (eg where you jointly conduct an account), we will allow each individual access to their own personal information and to the joint information (eg Account balances and transaction details) but not to the personal information of the other individual(s).

Responding to an access request

We will respond to your access request as soon as possible. There is no charge for access to your personal information.

Contact us about our privacy and information handling practices

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

- calling our service centre on 13 13 36, or
- e-mailing us at contactus@colonialfirststate.com.au

If you have any concerns or complaints about our privacy and information handling practices, please contact us as above. We will acknowledge your concern promptly, investigate the concern, and reply to you, advising of any decision and informing you of any remedies available, including possible appeal through dispute resolution bodies.

How the Commonwealth Bank Group handles your personal information

Colonial First State is a wholly owned but non guaranteed subsidiary of the Commonwealth Bank of Australia ('Group', 'We'), a leading Australian financial services organisation.

The Group is a collection of related organisations that provide banking, insurance, funds management, financial planning and advice, superannuation, stockbroking, and finance services.

We value your trust, and aim to help you manage and build wealth over a long period. The protection of your personal information is a vital part of this relationship. It is supported by our long experience of keeping personal information confidential.

We collect personal information so that you can be provided with the products and services you request. The law may also require us to collect personal information.

Personal information may be used and disclosed within the Group:

- to administer our products and services
- for prudential and risk management purposes
- so that you and the Group can have access to an integrated view of the relationship and
- unless you tell us otherwise, to provide you with related marketing / telemarketing information that might suit your financial, lifestyle or electronic needs.

We also use the information we hold to help detect and prevent illegal activity. We co-operate with police and other enforcement bodies as required or allowed by law. We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations. If the information we hold about you is inaccurate, incomplete, or outdated, please inform us so that we can correct it.

You can request access to the personal information we hold about you (an access charge may apply, but not to the request itself). If particular circumstances apply, we are permitted by the Privacy Act 1988 to deny your request for access, or limit the access we provide. If we deny or limit access to your personal information, we will let you know why. For example, we may give an explanation of a commercially-sensitive decision, rather than direct access to evaluative information connected with it.

Want more information?

For more information, please contact your financial adviser or call us on 13 13 36, 8am to 7pm Sydney time. Alternatively, please email us at contactus@colonialfirststate.com.au.