

Global Privacy Policy

May 2023

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Contact for questions:	Group Risk and Compliance

Who is Link Group

Link Group is a market-leading financial administrator that connects people with their assets. We provide technology-enabled administration solutions and related services across multiple product classes including superannuation, managed investments, equities, debt and property.

Since inception, Link Group has been entrusted by clients to handle commercial and personal data in a secure and confidential manner. A full listing of our business unit websites by Division is shown in Schedule A.

This document serves as a Privacy Policy and Privacy Notice that covers all Link Group subsidiaries. In this Policy, references to **we**, **us** or **our** are references to Link Group.

1. What is this policy?

- 1.1. We may collect Personal Information (defined below) about you and we are committed to protecting this Personal Information and your privacy. Set out in this Policy is an explanation of how we collect, use and safeguard your Personal Information. In most jurisdictions where we operate, the protections set out in this Policy also apply to the Personal Information of our employees provided by those employees to us.
- 1.2. The purpose of the Policy is to provide individuals and organisations with transparency about our collection, usage, maintenance, storage and destruction of Personal Information (which terms are often described as “processing”).
- 1.3. The key principles of integrity, openness, transparency, and respect for the rights of individuals are all elements of this Policy which apply to all of our business units globally.

2. Why do we need this policy?

- 2.1. This Policy sets out the minimum requirements for all our businesses and their employees for the confidentiality, security, integrity, and protection of Personal Information.
- 2.2. Where a jurisdiction in which we operate has regulatory or governance obligations over and above these Policy minimums, for that jurisdiction these additional requirements are included in Schedule B. Additionally, European Union (“**EU**”) and United Kingdom (“**UK**”) residents are entitled to additional rights under the respective EU and UK General Data Protection Regulation (“**EU and UK GDPR**”). Both the EU and UK GDPR apply even where the Data Controller (i.e. the entity that determines the purpose and means for processing Personal Information) is based outside of the EU or UK, and is offering goods or services to residents within the EU or UK. These rights are also outlined in Schedule B of this Policy.

3. What personal information do we collect?

- 3.1. Personal Information is information that relates to an identified or identifiable individual. Personal Information should only be collected and processed as is necessary for the purpose for which it was collected or obtained. Link Group will only collect and process Personal Information about you that is necessary to provide you with the products and services that you have requested.
- 3.2. The information we collect depends on the nature of our relationship with you. **Personal Information** we may collect includes:
 - **Contact information** – this includes your name, address, contact information and relationships to other people;

- **Financial and transactional information** – this includes payments, trades, payment card details, bank account information, tax residency information details of income and assets, mortgages, investments and superannuation and pensions contributions and values;
- **Product information** – information about the products and services we provide to you including unique reference numbers;
- **Socio-demographic information** – this includes your gender identity, job and education;
- **Communications** – personal information contained in letters, emails, phone calls or any other communications between us;
- **Technical and usage** – details on the devices and technology you use including internet protocol (IP) address, cookies, pixels and other tracking technology;
- **Behavioural** – details about how you use our products and services;
- **Documentary/identity information** – this includes information stored in documents such as a passport, driving licence or birth certificate, in addition to national identifiers and tax numbers;
- **Marketing and communication preferences;**
- **Authentication data** – this includes usernames, passwords and any information required to access our products and services;
- **Open data and public records** – this can include information from the Electoral Register, and information that is publicly available on the internet;
- **Information about criminal convictions and offences** – information obtained when carrying out anti-fraud or anti money laundering checks, or other background screening checks (in some cases, this will be “Sensitive Personal Information”, or information which otherwise attracts special rights and protections); and
- **Sensitive Personal Information** – in certain limited circumstances, we may request or receive Personal Information which is sensitive in nature. We will only collect and process this Sensitive Personal Information if the law allows. Sensitive Personal Information can include information relating to your health, genetic or biometric data, sexual orientation, racial or ethnic origin, political opinions, religious or philosophical beliefs and trade union membership.

4. Where do we collect your Personal Information from?

4.1. We may collect Personal Information directly from you:

- via application and various event registration forms;
- through feedback forms and other forums;
- when you purchase any of our products and services or our clients’ products and services;

- when you fill out a survey, or vote in a poll on our websites;
 - via our telephone calls with you, which may be recorded;
 - when you provide your details to us either online or offline;
 - when you communicate with us via email; or
 - via cookies (see section 10 of this Policy for further information).
- 4.2. We may also collect Personal Information about you internally, between Link Group entities, and from external organisations and third parties, including:
- Government agencies, authorities, regulators and official bodies (for example, when accessing government probate records);
 - Law enforcement and fraud prevention agencies;
 - People linked with you, such as joint account holders, trustees or another person you have authorised to act on your behalf;
 - Your legal representative or financial advisor, authorised to act on your behalf;
 - Identity verification and credit reference agencies;
 - Other financial services companies (for example, banks and card providers);
 - Public information and open sources such the Electoral Register, Companies House, internet searches, and information that is publicly available;
 - Companies we work with such as sub-contractors, suppliers and consultants;
 - Organisations that introduce you to us, for example brokers;
 - Your employer (past and current);
 - Third parties in connection with any merger or acquisition of a business by us;
 - Other companies, either because you ask us to or because of features of the product or service you have with us; and
 - from third party registers maintained by regulators such as those listed in Schedule D.

5. Why do we collect and process your Personal Information?

- 5.1. We are only allowed to process your Personal Information if we have a reason under data protection law.
- 5.2. The basis for processing your Personal Information will vary according to the nature of the relationship we have with you, the Link Group product that you hold or the Link Group service for which you have subscribed. For example:
- If you are an investor with whom we have a contract, we may be required to process your Personal Information to verify your identity, to administer your investment product, or to investigate fraud; or

- If you are an employee of a firm with whom we have a business relationship, we may be required to process your Personal Information as part of our contractual obligations and in the normal course of doing business with your firm; or
- If you are a user of our website, we may process your Personal Information which is contained in cookies, to track the use of our website.

5.3. The following are further illustrative examples of the circumstances in which we might collect or process your Personal Information, and the lawful basis/bases for processing in these circumstances.

Type of processing	Purpose of processing	Lawful basis/bases (EU/UK)	Our legitimate interests (EU/UK)
The administration and provision of services	<p>To provide our products and services;</p> <p>To communicate with you, including marketing activity;</p> <p>To resolve and respond to complaints;</p> <p>To manage our relationship with you or your business;</p> <p>To understand how you use our products and services; and</p> <p>To manage our brands, products and services.</p>	<p>To provide services set out in a contract with you;</p> <p>Your consent;</p> <p>To comply with our legal obligation(s); and</p> <p>Our legitimate interests.</p>	<p>Keeping our records up to date;</p> <p>Identifying support needs and communication preferences;</p> <p>Managing how we provide our products and services;</p> <p>Seeking your consent when we need it to contact you;</p> <p>To help meet contractual and legal obligations;</p> <p>To comply with regulations, guidance and rules;</p> <p>Understanding how our products and services are used and accessed;</p> <p>Identifying opportunities to improve; and</p> <p>To manage our commercial interests.</p>
Improving the services we offer to you	<p>To develop marketing opportunities and activities;</p> <p>To identify and develop new brands, products, services;</p> <p>To test new products; and</p> <p>To manage companies that we work with.</p>	<p>To provide services set out in a contract with you;</p> <p>To comply with our legal obligation(s); and</p> <p>Our legitimate interests.</p>	<p>Developing and improving products and services;</p> <p>Identifying opportunities to grow and improve our businesses;</p> <p>To help meet contractual and legal obligations;</p> <p>To comply with regulations, guidance and rules; and</p> <p>To manage our commercial interests.</p>
Managing our business	<p>To understand and monitor how our business is performing, changing and adapting;</p> <p>To ensure the ongoing provision of products</p>	<p>To provide services set out in a contract with you;</p> <p>To comply with our legal obligation(s); and</p>	<p>Managing how we provide our products and services;</p> <p>To help meet contractual and legal obligations;</p> <p>To comply with regulations, guidance and rules; and</p>

	<p>and services;</p> <p>To maintain our websites and apps;</p> <p>To manage fees, charges, interest or to collect money that is owed to us;</p> <p>For our own internal and external management information purposes; and</p> <p>Maintaining accounting records, analysis of financial results, internal audit requirements, and receiving professional advice.</p>	<p>Our legitimate interests.</p>	<p>To manage our commercial interests.</p>
Managing risk	<p>To comply with regulations, guidance, laws, rules and standards;</p> <p>To prevent and detect crime;</p> <p>To manage risk for us and our customers; and</p> <p>To establish, enforce or defend our legal rights.</p>	<p>To provide services set out in a contract with you;</p> <p>To comply with our legal obligation(s); and</p> <p>Our legitimate interests.</p>	<p>To protect (us and you) from loss, harm or damage;</p> <p>To improve business efficiency;</p> <p>To help meet contractual and legal obligations;</p> <p>To comply with regulations, guidance, laws, rules and standards; and</p> <p>To manage our commercial interests.</p>

5.4. In certain limited circumstances we may process Sensitive Personal Information (defined in Section 3.2 of this Policy). We will ask for your explicit consent to process this type of Personal Information, unless the processing is allowed under law.

6. With whom do we share Personal Information?

6.1. We will only disclose your Personal Information in accordance with applicable laws and regulations. In some instances, this will include sharing your Personal Information with third parties such as:

- Any member of Link Group, which includes our ultimate holding company and its subsidiaries (from time to time), as necessary to provide services to you;
- Government agencies, authorities, regulators and official bodies (for example, a privacy or data protection regulator or other relevant government department where reasonably necessary for financial crime and sanction compliance purposes);
- Law enforcement and fraud prevention agencies (for example, the police or another related authority that may require disclosure on legal grounds);

- People linked with you, such as joint account holders, trustees or another person you have authorised to act on your behalf;
- Your legal representative or financial advisor, authorised to act on your behalf;
- Identity verification and credit reference agencies (for example, Equifax and Experian);
- Other financial services companies (for example, banks and card providers);
- Companies we work with such as sub-contractors, suppliers and consultants, engaged by us to assist us in providing services to you (for example, cloud storage providers, mail-houses, IT system suppliers, auditors, lawyers, marketing agencies, document management providers, tax advisers and investment product and service administrators);
- Third parties in connection with any merger or acquisition of a business by us; and
- Other companies, either because you ask us to or because of features of the product or service you have with us.

7. How do we keep your Personal Information secure?

- 7.1. We store Personal Information in secure databases and in secure cloud environments. We take appropriate security measures to protect such Personal Information from misuse, interference and loss, as well as unauthorised access, modification or disclosure.
- 7.2. We take protection of your Personal Information and our system security very seriously. Any Personal Information that is collected, processed or stored will have appropriate safeguards applied in line with our data protection obligations. We have also designed and implemented controls to minimise loss of, or damage to, your Personal Information by human error, negligence or malicious intent and engage internal and external auditors to conduct regular, independent assurance exercises across our business to ascertain the effectiveness of our security control environment and our security strategy.
- 7.3. Our employees also protect your Personal Information whenever they are processing it and must undergo regular training on privacy and data protection requirements.
- 7.4. Our security controls are aligned to industry standards and good practice; providing a control environment that effectively manages risks to the confidentiality, integrity and availability of your Personal Information.
- 7.5. All exchanges of Personal Information between you and our websites go through encrypted channels in order to prevent interception of your Personal Information. Public access to your Personal Information via our websites or any web-hosted platform is protected by a login using a personalised user ID and password. You should ensure that your user ID and password are kept secret and not divulged to other people. As our websites are grouped to the internet which is inherently insecure, we cannot guarantee the Personal Information you supply will not be intercepted while being transmitted over the internet. Therefore, your use of our websites is entirely at your own risk. Accordingly, we accept no responsibility or liability for the security of Personal Information transmitted by you through our websites.

8. For how long will we store your Personal Information?

- 8.1. We generally hold your Personal Information on our systems for as long as is necessary

to provide our services to you. The length of time for which we keep your Personal Information will depend on the services we provide to you and their relevant regulatory requirements in your jurisdiction. Our websites use Google Analytics where a record of some of your Personal Information (e.g. IP address) may be retained for up to 38 months depending on your jurisdiction.

- 8.2. We typically keep Personal Information for up to a maximum retention period of 10 years from the date you cease to use the Services, depending on the jurisdiction where your Personal Information is held. In some cases, where there may be a dispute or a legal action, we may be required to keep Personal Information for a longer period.
- 8.3. When it is no longer required, we will take steps to delete, destroy, or de-identify your Personal Information. Where we are able to de-identify your Personal Information so that it can no longer be associated with you, we may retain that information indefinitely without notice to you.

9. Your rights

- 9.1. Each jurisdiction grants individuals certain legal rights in respect of their Personal Information. No matter where you are resident, you have the following rights in relation to how Link Group processes your Personal Information.
 - **Right to lodge a complaint** – You have a right to lodge a complaint to us at any time if you object to the way in which we have processed or managed your Personal Information. Where you are dissatisfied with our response, you also have the right to escalate your complaint to the relevant regulator in your jurisdiction. Further information can be located on the applicable regulator’s website (see Schedule D).
 - **Right of access** – All individuals have a right to access their Personal Information held by an organisation. There will not usually be a charge to you for us to respond to these requests. However, where the request is deemed by us to be excessive, you may be charged a fee for our providing you a record of your Personal Information that is held by us. Your Personal Information will usually be provided to you in hard copy, unless otherwise requested. Where you have made the request to receive a record of your Personal Information held by us by electronic means, we will endeavour to provide the data in the requested format where we are able to do so.
 - **Right of rectification** – We take reasonable steps to ensure that the Personal Information we collect and hold about you is accurate and complete. However, if you do not believe this is the case, you have the right to request we rectify the inaccuracy or to complete any incomplete Personal Information.
 - **Right to opt out from receiving any direct marketing** – You can ask us to stop sending you marketing messages at any time. Please see below for instructions on how you can do this.
- 9.2. Additional rights are available to individuals resident in the EU, UK and Australia, which are outlined in Schedule B of this Policy.
- 9.3. If you would like to exercise any of the above rights, please refer to Schedule C for the contact details for your jurisdiction.
- 9.4. In some circumstances, exercising some of these rights may result in us being unable to continue providing you with a prescribed service and/or our business relationship with you. Please note that in some cases, we may not be able to uphold your request for reasons such as our own obligations to comply with other legal or regulatory requirements. We will always respond to any request you make and if we can't comply with your request, we will

tell you why.

Marketing

- 9.5. We may contact you to tell you about products, services and offers that we think you may be interested in. When we send you this type of marketing message we will do so because we have a lawful basis to do so.
- 9.6. You have the right to opt out from receiving any direct marketing messages. You can ask us not to send you marketing messages by following the unsubscribe instructions that appear in our email communications. Alternatively, please refer to Schedule C for details of relevant local contact(s) in your jurisdiction.
- 9.7. You may continue to receive important information and service-related communications, regardless of your marketing preferences.

10. Cookies, pixels and tracking technology

- 10.1. We use cookies, pixels, online identifiers and similar tracking technologies on our websites, apps, and in our emails. This technology is used to improve our own products and services, your user experience, optimise what you may see on our websites and provide information when you are online. We comply with the cookie regulations as stated in the jurisdictions within which we operate.
- 10.2. **Cookies** - There are two types of cookies that can be stored on your device:
 - "session cookies", which only last for the duration of your visit to our websites and are automatically deleted from your device when you close your browser; and
 - "persistent cookies", which remain on your device after you have visited our websites and are not deleted when you close your browser. Persistent cookies are sent back to our server every time you visit our websites.

Users will be able to adjust their internet settings to accept all cookies, to notify them when a cookie is issued, or not to receive cookies at any time. If you use your browser settings to block all cookies (including essential cookies), you may not be able to access all or parts of our website.

- 10.3. **Pixels** – We use small images called “pixels” in our emails to help us improve our communications and to understand how you interact with them. The use of pixels allows us to understand whether and how many times you have opened an email, the device you used and the IP address. We may also set a cookie to find out if you clicked on any links in the email.
- 10.4. For further information about cookies, pixels and tracking technology used by Link Group, please see our [Cookie Policy](#), where a full list of the cookies used by Link Group web pages, and information on how to manage or delete cookies, is available.
- 10.5. Our websites may contain links to other websites that may make use of their own cookies technology and will have their own privacy policies. You should carefully review the privacy policies and practices of other websites that we do not control as we do not accept any liability for the privacy practices of such third-party websites.

11. Social media

- 11.1. We use a third-party provider, LinkedIn, to manage our social media interactions. If you

send us a private or direct message via social media, it will be stored by LinkedIn for the period of time your account is in existence.

- 11.2. We see all this information and decide how we manage it. For example, if you send a message via social media that needs a response from us, we may process it in our contact management system as an enquiry or a complaint.
- 11.3. When contacting Link Group through a social media platform, we suggest you also familiarise yourself with the privacy information on that platform.

12. Who can you speak to about this policy?

- 12.1. If you have any questions, or want more details about how we use your Personal Information, please refer to Schedule C of this Policy for details of relevant local contact(s) in your jurisdiction.
- 12.2. If you are unhappy with how we have handled your Personal Information and wish to make a complaint, please refer to Schedule C of this Policy for details of relevant local contact(s) in your jurisdiction. You also have the right to complain to the relevant regulator in your jurisdiction, and to lodge an appeal if you are not happy with the outcome of a complaint. Please refer to Schedule D of this Policy for details.

13. Changes to this policy

- 13.1. Please note that this Policy will be reviewed periodically and may be changed from time to time. We provide details on this page to inform you of when this Policy was last updated.

Schedule A: Link Group business unit websites by division

Corporate Markets	Retirement & Superannuation Solutions
<p>Corporate Markets – Australia https://www.linkmarketservices.com.au/corporate/home.html New Zealand (including Pacific Custodians (New Zealand)) https://www.linkmarketservices.co.nz/ Germany https://www.linkmarketservices.de/ South Africa https://www.linkmarketservices.co.za/Home/ Hong Kong https://www.linkmarketservices.hk/corporate/ United Kingdom https://www.linkassetsservices.com/what-we-do/market-services</p>	<p>AAS – Australia https://www.aas.com.au/ Link Advice – Australia http://linkadvice.com.au/ Super Clearing House Online – Australia http://www.sch-online.com.au/Home/</p>
	Banking & Credit Management
	<p>Banking & Credit Management – Ireland, United Kingdom, the Netherlands and Italy https://www.linkassetsservices.com/what-we-do/banking-and-credit-management</p>
<p>Link Intime – India https://linkintime.co.in/</p>	Fund Solutions
<p>Orient Capital – Australia, Hong Kong and United Kingdom https://www.orientcap.com/</p>	<p>Link Fund Solutions – Australia https://www.linkfundsolutions.com/</p>
<p>D.F. King – France, Germany, Hong Kong, and United Kingdom http://www.dfkingltd.com/</p>	<p>Link Fund Solutions United Kingdom http://www.linkfundsolutions.co.uk/ Ireland http://www.linkfundsolutions.co.uk/ie/589.c.shtml Luxembourg https://www.linkassetsservices.com/what-we-do/funds-solutions/luxembourg-management-company/</p>
<p>Link Market Services including Treasury Services – United Kingdom, Jersey, Guernsey and the Isle of Man https://www.linkassetsservices.com/what-we-do/market-services</p>	
<p>Company Matters Australia https://www.companymatters.com.au/ United Kingdom https://www.linkassetsservices.com/what-we-do/company-secretarial</p>	
	Technology & Operations
<p>Pacific Custodians Australia https://www.linkmarketservices.com.au/corporate/services/trustee-services.html</p>	<p>Link Digital Solutions – Australia https://www.linkdigitalsolutions.com/ SyncSoft – Australia</p>
	<p>Empirics – Australia https://www.empirics.com.au/home/</p>

Schedule B: Additional Privacy Requirements

For EU and UK residents, in addition to those obligations outlined in Section 5 of this Policy, the following additional rights apply globally:

Under UK and European law, there must be one of the following lawful bases for us to process your Personal Information:

- **Contract** – The processing of Personal Information is necessary for the performance of a contract to which you are party;
- **Legitimate interest** – The processing of Personal Information is necessary for our legitimate interest (and when the processing of your Personal Information is based on our legitimate interest(s), we ensure that our interests do not unfairly override your rights and freedoms);
- **Consent** – Where you have given us clear consent to process your Personal Information for a specific purpose;
- **Legal obligation** – The processing of Personal Information is necessary for us to meet our legal and regulatory obligation(s); or
- **Public interest** – The processing of Personal Information is necessary for reasons of public interest.

For EU and UK residents, the following outlines how we approach transferring and processing your Personal Information internationally:

We have adopted the EU and UK GDPR to inform our global privacy and data protection standards. EU and UK residents are advised that sometimes Link Group entities or third parties who we share your Personal Information with (see Section 6 of this Policy), will process your Personal Information outside of the EU and UK.

If you are an EU or UK resident, when your Personal Information is processed outside of the EU or UK, we will ensure that appropriate safeguards are in place. We will also require that any such Link Group entity or third party outside of the EU or UK has put in place adequate safeguards to ensure that your Personal Information is held securely and in accordance with this Policy.

If we are to undertake a transfer of your Personal Information to a non-adequate third country (i.e., a country outside of the EU / EEA or UK that has not already been granted data “adequacy” status from the EU Commission or UK government), we will, in line with our legal obligations: (a) choose and implement an appropriate tool for the transfer; (b) complete a transfer impact assessment; and (c) if necessary, choose and implement Supplementary Measures, aimed at providing essentially equivalent protection to the GDPR.

If you would like further information on the safeguards, we use to share Personal Information internationally, please contact your local Privacy/Data Protection Officer. Contact details can be found in Schedule C of this Policy.

For EU and UK residents, in addition to those rights outlined in Section 9 of this Policy, the following additional rights apply globally:

Right to erasure – you have the right to ask us to delete your Personal Information if our continued use is not justified. This request will be balanced against other factors, depending upon the type of Personal Information we hold about you and why we have collected it. There may be some legal and regulatory obligations which mean we cannot comply with your request.

Right to restrict processing – you have the right to ask us to restrict our use of your Personal Information if one of the following applies:

- If your Personal Information is not accurate;
- If the processing of your Personal Information is unlawful and you do not want us to delete it;
- If we no longer need your Personal Information, but you want us to retain it for the establishment, exercise or defence of legal claims; or
- Whilst we verify if we can uphold your objection to us processing your Personal Information.

Right of data portability – you have the right to ask us to provide you with a copy of the Personal Information that you have supplied to us in a commonly used machine-readable format or to transfer your information directly to another data controller (e.g. a third party offering services competing with ours). Once transferred, the other party will be responsible for looking after your personal information.

Right to object – You can object to us keeping or using your Personal Information in some situations, this includes when our lawful basis for processing is in the public interest or in our legitimate interest, or when your Personal Information is processed for direct marketing purposes (see Sections 5, 10 and 11 of this Policy).

Right to withdraw consent – for certain limited uses of your Personal Information, we may ask for your consent. Where we do this, you have the right to withdraw your consent at any time. If you withdraw your consent, we may not be able to provide certain products and services to you. If this is the case, we'll tell you.

Right not to be subjected to automated-decision making (that is, using technology solutions rather than human judgement to automatically determine outcome – e.g. assessment of credit worthiness). You have the right not to be subject to a decision based solely on automated processing, including profiling, which produces a legal or similarly significant effect on you, unless it is:

- Necessary for a contract between us and you;
- Authorised by law; or
- Based on your explicit consent.

You can object to an automated decision we have made and ask that a person reviews it. Currently, we do not make decisions about you solely based on automated processing.

In some circumstances exercising some of these rights will mean we are unable to continue providing you with your investment or maintaining a business relationship with you.

For Australian residents, the following additional rights apply globally:

Personal Information includes **Sensitive Personal Information**, which includes the following information for individuals in Australia:

- Trade union and/or political party affiliation; and
- Criminal records.

Anonymity and pseudonymity – Individuals dealing with us have the option of being anonymous

or using a pseudonym unless we:

- are required or authorised by law or a court or a tribunal order to deal with identified individuals; or
- it is impracticable for us to deal with you if you have not identified yourself.

If we are unable to collect your personal information – In addition to not being able to provide certain products or services to you, the following may also occur:

- we may not be able to provide you with information that you requested;
- we may not be able to offer you employment with us; and / or
- you may be subject to additional taxation or your assets or entitlements could be transferred to ASIC, the ATO or to State revenue offices.

Dealing with unsolicited personal information – Generally, most information received by us is immediately and automatically recorded (I.e. most telephone calls are electronically recorded and most documents received are scanned into an electronic image.) This is necessary because we are a trusted third-party record keeper, providing technical, administrative, support and/or financial services involving day-to-day money and security asset movements, where imprecise record keeping may have significant adverse consequences.

Where it becomes apparent that a communication contains unsolicited personal information that could not otherwise lawfully be requested or used, we will make reasonable efforts to delete, destroy or de-identify the record. Where it is impracticable to do this (for example, the unsolicited information is combined with necessary information), the record will be retained, subject to the safeguards detailed in this privacy policy.

Disclosing your personal information outside of Australia – As part of providing services to you and in our capacity as a service provider, occasionally personal information may be stored or processed at locations outside of Australia.

We may disclose personal information to corporate and third party suppliers and service providers located overseas for some of the purposes listed in Section 4 of this policy. They include: data hosting organisations, IT service providers, and other third party vendor/suppliers located overseas.

Those countries that we may disclose your personal information to that are located outside of Australia, include: China (Hong Kong), France, Germany, India, Luxembourg, New Zealand, Papua New Guinea, the Philippines, and the United Kingdom, the United States of America, and United Arab Emirates as at the date of this policy.

Enquiries and Complaints – Individuals may lodge an enquiry with us directly at any time. Complaints should be lodged with us in the first instance and will be dealt with efficiently in accordance with our established internal dispute resolution processes. If you are not satisfied with how your complaint has been managed or if we have not responded to your complaint within 30 days, you may escalate your complaint to the regulator – refer to Schedule D of this policy.

We encourage individuals wishing to make enquiries or lodge a complaint about how we handle personal information to do so using any of the following means:

Telephone: + 61 1800 502 355 (free call within Australia)
9am–5pm (Sydney time), Monday to Friday (excluding public holidays),

Email: privacy.officer@linkgroup.com;

Post: Attn: Privacy Officer
Link Group
Locked Bag A14
Sydney South NSW 1235

Schedule C: Link Group Privacy / Data Officer contact details

<p>John Deane E: John.Deane@linkgroup.co.uk</p>	<p>Data Protection Officer for:</p> <p>Link Corporate Markets</p> <ul style="list-style-type: none"> ● Link Market Services Ltd; ● Link Market Services Trustees Ltd; ● Link Registrars Ltd; ● Link CTI Ltd; ● Link Market Services (Isle of Man) Ltd; ● Link Market Services (Jersey) Ltd; ● Link Market Services (Guernsey) Ltd; ● Link Treasury Services Ltd; ● Company Matters; ● Orient Capital Ltd; ● Orient Capital GmbH; and ● D F King Ltd.
<p>privacy.officer@linkgroup.com</p>	<p>Privacy queries relating to:</p> <p>Corporate Markets (Australia)</p>
<p>Grainne Mannion E: Grainne.Mannion@linkgroup.ie</p>	<p>Data Protection Officer for:</p> <p>Banking and Credit Management</p>
<p>privacy.officer@linkgroup.com</p>	<p>Privacy queries relating to:</p> <ul style="list-style-type: none"> ● Empirics Marketing Pty Ltd; ● Australian Administration Services Pty Ltd; ● Government Employee Superannuation Board (GESB); ● Link Super Pty Ltd (i.e. Russell); and ● The Superannuation Clearing House Pty Ltd.

Other Enquiries

Australia	EU	India	Hong Kong	New Zealand
Privacy.officer@linkgroup.com	Data.protectionofficer@linkgroup.co.uk	Privacy.officer@linkgroup.com	Privacy.officer@linkgroup.com	Privacyofficer@linkmarketservices.co.nz

Schedule D: Regulatory authority per jurisdiction

Country	Authority Name	Website	Contact Details
Australia	Office of the Australian Information Commissioner (OAIC)	www.oaic.gov.au	GPO Box 5218, Sydney NSW 2001 T 1300 363 992 enquiries@oaic.gov.au
United Kingdom	Information Commissioner's Office	www.ico.org.uk	Wycliffe House, Water Lane Wilmslow, Cheshire SK9 5AF T +0303 123 1113 (or +44 1625 545745 if calling from overseas) F 01625 524510
Germany	Germany has a Data Protection Authority for each of the 16 German states (<i>Länder</i>).		
France	The « Commission Nationale de l'Informatique et des Libertés » or « CNIL »	https://www.cnil.fr/en/home	3 place de Fontenoy TSA 80175 75334 Paris Cedex 07 1. 01 53 73 22 22 53 73 22 00
Netherlands	The Dutch Data Protection Authority (<i>Autoriteit Persoonsgegevens</i>)		Autoriteit Persoonsgegevens, Postbus 93374, 2509 AJ DEN HAAG Telephone number: (+31) - (0)70 - 888 85 00

Country	Authority Name	Website	Contact Details
Ireland	<i>An Coimisinéir Cosanta Sonraí</i> (or the Data Protection Commission)	www.dataprotection.ie	Dublin: 21 Fitzwilliam Square, Dublin 2, D02 RD28, Ireland Regional Office: Canal House, Station Road, Portarlington, R32 AP23 Co. Laois Telephone: +353 57 868 4800
Luxembourg	Commission Nationale pour la Protection des Données (CNPD)		Avenue du Rock'n'Roll, L-4361 Esch-sur-Alzette, T: +352 26 10 60 1 F: +352 26 10 60 29
Jersey	Jersey Office of the Information Commissioner	https://jerseyoic.org	2 nd Floor, 5 Castle Street, St Helier, Jersey, JE2 3BT. T +44 (0) 1534 716530
Guernsey	The Office of the Data Protection Authority	https://odpa.gg	St Martin's House, Le Bordage, St. Peter's Port, Guernsey, GY1 1BR
Isle of Man	Isle of Man Information Commissioner,	https://www.inforights.im	PO Box 69, Douglas, Isle of Man, IM99 1EQ T +44 1624 693260
Hong Kong	The Office of the Privacy Commissioner for Personal Data	http://www.pcpd.org.hk/	12/F, Sunlight Tower, 248 Queen's Road East Wanchai, Hong Kong T +852 2827 2827 F +852 2877 7026
India	No authority currently exists		
New Zealand	The Privacy	www.privacy.org.nz	Level 4, 109-111 Featherston Street Wellington 6143, New Zealand



Commissioner's Office

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