



Document Title

# Privacy Policy

Policy Owner:	AAM Corporate Affairs Team
Endorsed by:	Corporate Affairs Team
Approved by:	Board of AAM Investment Group Pty Ltd ACN 612 701 274 ( <b>AAM</b> )
Last review Date:	November 2023
Next review Date:	November 2025



## 1. Our approach to privacy

AAM recognises the importance of the privacy of individuals who have dealings with AAM. We are bound by the Privacy Act 1988 (Privacy Act), the Australian Privacy Principles contained in the Privacy Act, and other applicable laws, such as the Spam Act 2007 (Cth).

## 2. What does "personal information" mean?

Personal information is defined in the Privacy Act to mean information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether recorded in material form or not.

## 3. What information do we collect and why do we collect it?

Personal information that AAM may hold includes the following:

- Name, address and contact details
- Date of birth
- Employment, income, bank account and financial details
- Details of the products and services provided to an individual by AAM.

AAM will collect personal information about you in order to process an application, administer an investment, provide services related to an investment (including research and administrative tasks related to the management of your investment) and comply with statutory laws and regulations.

We may also use the information about you to:

- identify other products which may be of interest to you and provide you with information about those products;
- maintain an ongoing relationship with you;
- conduct market research; or
- conduct surveys on investor satisfaction.

You can ask not to receive marketing materials from us.

The Privacy Act protects your sensitive information — such as information about your religion, ethnicity, health, or biometrics. We will not collect your sensitive information.

## 4. How we collect personal information?

AAM collects personal information directly from an individual where reasonable and practical. Typically, this will be collected through our application forms, emails, meetings or telephone calls with you.

AAM may also collect personal information from other sources including:

- other entities who provide services to AAM related to the products and services provided to an individual by AAM;
- publicly available sources of information; or
- an individual's representative (including spouse, accountant, financial advisor, or other professional advisor).

We will tell you within a reasonable time if we have collected information about you from a third party.

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name. Our website uses cookies. The main purpose of cookies is to identify users and to prepare customized web pages for them. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and linked websites are not subject to our privacy policies and procedures.

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you with the services or assistance you are seeking.

## 5. Do we disclose your personal information to anyone?

We may disclose your personal information to our related entities and to third parties who assist us with our business (for instance your financial planner, the registry, the custodian, auditors, regulatory bodies and external contractors who provide data backup and restoration).

In some circumstances, personal information may be disclosed to our service provider (i.e., Registry) located in Singapore.

Where we disclose your information to our service providers, we will take steps to ensure that they are authorised to only use personal information to perform the functions required by AAM.

The law also permits us to use or disclose personal information for other purposes in certain circumstances.

## 6. How do we keep your information and ensure it is accurate?

We store your personal information in different ways, including in paper and in electronic form. The security of your personal information is important to us. We take all reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, unauthorized access, modification, or disclosure, including appropriate electronic and physical security measures. Access to and the use of personal information is appropriately limited to prevent misuse or unlawful disclosure of the information.

Your personal information will be stored in Australia. In the event of overseas disclosure, we will take reasonable steps to ensure that the overseas recipient complies with the Australian Privacy Principles in relation to your personal information.

## 7. How do we protect your information and ensure it is accurate?

We take reasonable steps to ensure that the personal information we retain is accurate, complete, up-to-date, and not misleading. To assist us with this, please notify us if any of your details have changed.

## 8. Can you access and correct the personal information we hold about you?

You can ask us to provide you with access to the personal information that we hold about you by contacting us as set out below. We will respond to your request within a reasonable time. If we do not agree to give you access, we will provide you with reasons in writing and notify you of the mechanisms you have to make a complaint. We may charge you a reasonable fee to access your personal information (but there will be no fee to make a request).

You can ask us to correct the personal information and we will comply unless we are permitted by law not to. If we do not agree with your request, we will provide written reasons, including details about the

mechanisms you have to make a complaint. You can also ask us to include a note on your file that you have requested a correction and can ask us to inform third parties to whom we have disclosed your personal information that it needs to be updated.

## 9. Who should you contact if you have any questions regarding our Privacy Policy?

If you believe that we have not protected your personal information as set out in the Privacy Policy or in relation to a breach of the APPs or a registered privacy code that binds us, you may lodge a complaint with us by phone or email. We will deal with your complaint within a reasonable time and will provide a formal response to your complaint.

Telephone: 61 7 3153 8830  
Email: [compliance@aamig.com.au](mailto:compliance@aamig.com.au)  
Write to: The Privacy Officer  
AAM Investment Group  
GPO Box 352  
BRISBANE Q 4001

## 10. What if you are not satisfied with our response?

If you are not satisfied with the result of your complaint to AAM, you can refer your complaint to the Information Commissioner. Their details are available at [www.oaic.gov.au](http://www.oaic.gov.au).