

MAINSTREAM FUND AND SUPERANNUATION SERVICES PRIVACY POLICY Effective March 2018

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MAINSTREAM FUND AND SUPERANNUATION SERVICES PRIVACY POLICY

CONSIDERATION OF PERSONAL INFORMATION PRIVACY

Mainstream Fund Services and Mainstream Superannuation Services (Mainstream) have developed the following policy when handling personal information to protect the privacy of individuals we deal with in accordance with the Australian Privacy Principles (APPs) that came into effect on 12 March 2014 and Singapore's Personal Data Protection Act 2012.

Individuals have the option of not identifying themselves or using a pseudonym when contacting Mainstream. However, if an individual elects not to identify themselves or to use a pseudonym, only publicly available information will be disclosed to them. Identification is always required prior to disclosing any account-specific information.

COLLECTION OF PERSONAL INFORMATION

Mainstream collects relevant personal information which is necessary to complete functions or activities, personal information includes:

- › An individual's name, contact details and identification numbers (which may include government-issued tax file numbers).
- › Date of birth
- › Any interactions with an individual including by telephone, email and online if arranged with a contracting party.
- › The products and services we provide to an individual or have provided in the past.
- › Any inquiries or complaints

Personal information collected by Mainstream is used to:

- › Provide the individual with a product or service

- › Maintain the individual's contact details
- › Meet our legal obligations (in particular, obligations relating to Anti-Money Laundering and Counter-Terrorism Financing and taxation).

Mainstream does not generally collect sensitive information unless required to by law. Sensitive information includes:

- › Racial or ethnic origin
- › Political or religious beliefs
- › Health information
- › Sexual orientation and practices
- › Criminal convictions
- › Membership of professional associations or trade associations or unions.

DEALING WITH PERSONAL INFORMATION

Personal information is used by Mainstream to correctly administer customer relationships while at the same time complying with the legislative framework which we operate in (eg AML/CTF legislation, correct withholding tax rates charged).

Personal information is maintained under unique customer identifiers, and will only be shared with other staff members within Mainstream when there is a legitimate business reason.

Mainstream may disclose an investor's personal information to the following parties:

- › The financial adviser authorised by the investor either on the initial application form or subsequent correspondence.
- › Any party as required to fulfil our legal obligations.
- › The Investment Manager or the Responsible Entity of the Fund.
- › Superannuation funds, employers and clearing houses.
- › Service providers who provide services in connection with our products and services.

Mainstream may share investor personal information internally, including with colleagues based in other Mainstream offices or to third party service providers for the purpose in which it was disclosed to us. Parties to whom we disclose personal information may operate outside Australia in countries including Malta, Philippines, Isle of Mann, Singapore, Hong Kong, Ireland and the Cayman Islands. If/when this occurs we make sure that appropriate data handling and

security arrangements are in place. Staff located in all Mainstream offices have been trained on the Australian Privacy Principles and have access to the Mainstream Fund and Superannuation Services Privacy Policy and procedures. Where Mainstream engages a third-party service provider contractual obligation exist for the service provider to adhere to Australian privacy laws. Further any personal information is also protected under Singapore's Personal Data Protection Act 2012. Further privacy obligations may be applied to individual contracts in addition to this policy in specific jurisdictions.

Mainstream does not sell personal information. From time to time, a client might instruct Mainstream to inform an individual of an investment opportunity or to provide information which might be of interest. An individual can elect to opt out of receiving these communications if requested.

INTEGRITY OF PERSONAL INFORMATION

Mainstream takes reasonable steps to ensure the personal information we collect and store is correct and current.

We take reasonable steps to ensure the security of the personal information once it is collected. This includes protecting it from misuse, interference and loss, unauthorised access, modification or disclosure.

ACCESS TO & CORRECTION OF PERSONAL INFORMATION

On request from the individual, Mainstream will provide access to the up to date information we hold on them. Mainstream will correct any errors in personal information once notified by the individual.

NOTIFIABLE DATA BREACH SCHEME

To comply with the Australian Notifiable Data Breach Scheme, effective 22 February 2018, Mainstream has in place policies and procedures to ensure that data breaches are reported to the Office of the Australian Information Commissioner (OAIC) and to the individuals affected in accordance with the scheme.

CONTACTS

If you have any questions regarding our privacy policy or handling of information, please direct your query to:

Phone: +61 2 9247 3326

Fax: +61 2 9251 3525

Address: **Mainstream Fund Services**
Attention: Compliance Officer
GPO Box 4968
Sydney NSW 2001