



# Channel Investment Management Ltd

## Privacy Policy

Central to the success of Channel Investment Management Limited (Channel) is our commitment to our clients. We respect and protect the privacy of the personal information of individuals with whom we deal.

### The information we collect and hold

Whenever it is reasonable and practical to do so, we collect information about you directly from you. In some cases, we collect personal information from third parties including public sources, our related companies, referrers, brokers, agents, your adviser(s) and our service providers.

We collect personal information about you which is reasonably necessary to:

- provide you with quality products or services
- consider applications and approaches you make to us
- maintain your contact details
- fulfil our legal obligations under applicable laws and rules, such as those relating to taxation and Anti-Money Laundering and Counter-Terrorism Financing.

We generally hold personal information relating to:

- the products and services we provide or have provided to you
- your financial interests and sometimes your financial position, if you are a customer or potential customer of ours
- your name, contact details and identification information (including government-issued tax numbers)
- records of our interactions with you, including by telephone, email and online
- your enquiries or complaints.

We do not generally collect sensitive information about you unless required by applicable laws or rules.

Sensitive information includes information relating to:

- race
- political or religious beliefs
- sexual preferences
- criminal convictions
- membership of professional or trade associations or unions
- health information.

We may collect health information if assessing certain claims including hardship. We do not use or share that information for any purpose other than as disclosed to the customer when the information was collected.

We may collect information about your affiliation with certain organisations such as professional associations.

## **How that information is used**

We only use and disclose personal information about you for the purpose for which it was disclosed to us or related purposes which would reasonably be expected without your permission. For example, we may use and disclose personal information to process applications, administer and manage our products and services including monitoring, auditing, and evaluating those products and services, model and test data, communicate with you and deal with any complaints or enquiries. We may also use and disclose your personal information (on a confidential basis) in connection with acquisitions, mergers or changes in control of our business or assets.

We may from time to time also use your personal information to inform you of investment opportunities or to provide information about products and services which we expect may be of interest to you. However, we do respect your right to ask us not to do this.

We do not sell personal information to other organisations to allow them to do this.

We may disclose personal information outside Channel:

- as required by relevant laws or rules, such as those relating to Anti-Money Laundering and Counter-Terrorism Financing
- to service providers who provide services including archival, auditing, administration, accounting, customer contact, custody, distribution, legal, business consulting, banking, payment, delivery, investment management, data processing, data analysis, mailing, marketing, research, investigation, identity verification, maintenance, trustee, securitisation, website and technology services
- to your nominated financial adviser with your permission.

In some circumstances the parties with whom we share personal information may operate outside of Australia (this includes locations in the countries listed in the Appendix). Where this occurs, we take steps to protect personal information against misuse or loss.

## **Keeping information accurate and up to date**

We take reasonable steps to ensure that all information we hold is as accurate as is possible. You are able to contact us at any time and ask for its correction if you feel the information we have about you is inaccurate or incomplete.

## **Keeping information secure**

We use security procedures and technology to protect the information we hold. Access to and use of personal information within Channel seeks to prevent misuse or unlawful disclosure of the information.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

Where the personal information we collect is no longer required, we delete the information or permanently de-identify it.

If there is a suspected or actual data breach which may compromise personal information, Channel will promptly undertake an assessment of the incident. Where relevant, immediate steps will be taken

to contain the breach. These steps may include limiting any further access or distribution of the affected personal information, or the possible compromise of other personal information.

If the unauthorised access, disclosure or loss of personal information is likely to cause serious harm to one or more individuals and the likely risk of serious harm has not been prevented by remedial action, Channel will notify affected individuals and the Office of the Australian Information Commissioner as soon as practicable. The notification will include Channel's identity and contact details, a description of the incident, the kind/s of information concerned and any recommended steps for affected individuals.

Following any data breach incident, Channel will undertake a review process to help prevent future breaches.

## **How you can access or correct your information**

You can contact us as set out below to request access to or correction of your personal information. In normal circumstances we will give you full access or make the requested corrections to your information. However, there may be some legal or administrative reasons to deny these requests. If your request is denied, we will provide you with the reason why. Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

## **Dealing with Channel online**

When you visit the Channel website you will browse anonymously unless you have accessed the website from a personalised communication from Channel.

For all visitors to our web site, we use cookies to collect anonymous information such as the server your computer is logged on to, your browser type (for example, Internet Explorer, Chrome or Firefox), and your IP address. An IP address is a number that is assigned to your computer automatically and required for using the Internet. We may also derive the general geographic area associated with an IP address.

If you are an anonymous visitor, the information we collect is not capable of personally identifying you.

Once you have accessed our website from an e-mail or other personalised communication sent to you, we may be able to identify you. If we have identified you, we may be able to link your identity to your previous anonymous browsing history and collect information about your possible future use of our website, irrespective of how you access our sites (eg by clicking a link in an advertisement or from a third party website). In addition we may combine that information about your use of the Channel website with certain other online and offline information we have about you in order to tailor your online experience and provide you with further information. If you would prefer not to be identified you can delete the cookies and reconfigure the cookie preferences on your internet browser (see below).

## **Cookies**

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used on the Channel site to:

- collect identifiable information about your use of our website - if we have identified you as a result of you accessing our website from an e-mail or other personalised communication sent to you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences).

If you disable the use of cookies on your web browser or remove or reject specific cookies from the Channel website then you may not be able to gain access to all of the content and facilities on that website.

## Contact us

If you have any questions regarding our privacy policy or handling of information, please direct your enquiry to [privacy@channelcapital.com.au](mailto:privacy@channelcapital.com.au) or contact us by phone on (07) 3259 7650. Please mark communications to the attention of our Privacy Officer. Where you contact us seeking resolution of your privacy concerns, we will respond to let you know who will be handling your matter and when you can expect a further response. If your concerns are not resolved to your satisfaction, you may have rights to escalate your complaint to a regulatory authority. You may contact the Office of the Australian Information Commissioner on the privacy hotline: 1300 363 992 or FOS Australia on 1800 367 287.

Before you contact FOS Australia or the Office of the Australian Information Commissioner, we recommend that you first try to resolve your concern with us.

*Policy updated 22 February 2018*

## APPENDIX – Disclosure to other countries

Personal information may be disclosed to third parties in jurisdictions including: Canada, Luxembourg, Singapore, Hong Kong, Malaysia, the United Kingdom and the United States of America.