

## **PRIVACY POLICY**

Future Asset Management International Limited (ACN 158 385 187 and AFSL 424 626) and its subsidiaries (**We**) are committed to protecting and securing the privacy and confidentiality of your personal information. From 12 March 2014, we are subject to the new privacy requirements as a result of implementation of the Australian *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (the **Privacy Act**), which amends the *Privacy Act 1988*. We must adhere to the *Australian Privacy Principles* in relation to collecting, using, disclosing, securing and allowing access to, your personal information.

We understand how important it is to protect your personal information. This policy (together with our [Terms of Use](#) and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us. The policy also describes how you can ask further questions or make a complaint. By visiting our website and any of its inner pages, including any subdomains thereof (“**our site**”) you are accepting and consenting to the practices described in this policy.

### **INFORMATION WE MAY COLLECT FROM YOU**

We may collect and process the following data about you:

- **Information you give us.** You may give us information when filling in forms on our site or by corresponding with us by phone, e-mail or otherwise. This includes information you provide when you create an account, search within our site, subscribe to our Newsletter, when you download our Product Disclosure Statements, when you fill out an expression of interest, engage our services, and when you report a problem with our site. The information you give us may include but is not limited to your name, date of birth, address, e-mail address and phone number, financial and credit card information, personal description, trading information, interests, occupation, tax file number and photographs. Without such information, we may not be able to process your request, provide the requested service to you, or provide you with an appropriate level of service.
- **Sensitive Information:** The Privacy Act protects your sensitive information, such as information about your religion, ethnicity, health or biometrics. If we need this type of information, we will ask for your permission, unless required by law.
- **Information we collect about you.** With regard to each of your visits to our site we may automatically collect the following information:
  - Technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system and platform;
  - Information about your visit, including the full Uniform Resource Locators (URL) clickstream to, through and from our site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.
- **Information we receive from other sources.** We may receive information about you from third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

## COOKIES

Our site uses cookies to distinguish you from other users of our site. This helps us to provide you with a good experience when you browse our site and also allows us to improve our site.

A cookie is a small file of letters and numbers that we store on your browser or the hard drive of your computer if you agree. Cookies contain information that is transferred to your computer or handheld mobile device's hard drive. You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. If you disable the use of cookies on your web browser or reject specific cookies from our site, they you may not be able to gain access to all of the content and facilities on those websites.

We use the following cookies:

- **Strictly necessary cookies.** These are cookies that are required for the operation of our site. They include, for example, cookies that enable you to log into secure areas of our site, use a shopping cart or make use of e-billing services.
- **Analytical/performance cookies.** They allow us to recognise and count the number of visitors and to see how visitors move around our site when they are using them. This helps us to improve the way our site works, for example, by ensuring that users are finding what they are looking for easily.
- **Functionality cookies.** These are used to recognise you when you return to our site. This enables us to personalise our content for you, greet you by name and remember your preferences (for example, your choice of language or region).
- **Targeting cookies.** These cookies record your visit to our site, the pages you have visited and the links you have followed. We will use this information to make our website and the advertising displayed on it more relevant to your interests. We may also share this information with third parties for this purpose.

## USES MADE OF THE INFORMATION

We use personal information for the purpose for which it was provided to us, including to:

- **Information you give to us.** We will use this information:
  - To carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
  - To provide you with information about other goods and services we offer that are similar to those that you have already purchased or enquired about;
  - To provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you. If you are an existing customer, we will only contact you by telephone, postal mail or electronic means (e-mail, social media or SMS) with information about goods and services similar to those which were the subject of a previous expression of interest, previous sales or negotiations of a sale to you. If you are a new customer, and where we permit selected third parties to use your data, we (or they) will contact you by either telephone, postal mail or electronic means if you have consented to this. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;
  - To notify you about changes to our service;

- To ensure that content from our site is presented in the most effective manner for you and for your computer.
- **Information we collect about you.** We will use this information:
  - To administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
  - To improve our site to ensure that content is presented in the most effective manner for you and for your computer;
  - To allow you to participate in interactive features of our service, when you choose to do so;
  - As part of our efforts to keep our site safe and secure;
  - To measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
  - To make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.
- **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).
- We use all of the information we have, as stated in this policy, to help us provide and support our services. We are able to deliver our services, personalise content, and make suggestions for you by using this information to understand how you use and interact with our site and services and interest in our services and the content on our sites. We may provide business partners with information about the reach and effectiveness of their advertising without providing information that personally identifies you, or if we have aggregated the information so that it does not personally identify you, for example, we may tell business partners how many people viewed a certain page on our site, or provide non-personally identifying demographic information to business partners to help them understand their audience or customers.
- While we may sometimes share personal information with companies we do business with, we do not sell personal information for marketing purposes to other organisations or allow such companies to do this.

#### DISCLOSURE OF YOUR INFORMATION

We may disclose your personal information to any of our related bodies, which means our subsidiaries, our ultimate holding company and its subsidiaries, or any other individual or organisation ("Person") who directly or indirectly controls, is controlled by, or is under direct or indirect common control with, us, and includes any Person in like relation to a related body. A Person is deemed to control another Person if such person possesses, directly or indirectly, the power to direct or cause the direction of the management and policies of such other Person, whether through the ownership of voting securities, by contract or otherwise.

We may share your information with selected third parties including:

- Financial institutions including stockbrokers, custodians, insurers, fund managers and portfolio service providers and other entities that administer your financial products;
- Anybody who represents you, such as your lawyers, accountants and advisors;

- Where we are required to do so by law, such as under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth);
- Organisations providing verification of your identity, including online verification of your identity;
- Investors and potential investors, agents or advisors, or any entity that has an interest in our business; and
- Trusted partners who work on behalf of or with us under confidentiality agreements. These companies may use your personal information to help us communicate with you about the services you are using and our offers, and our marketing partners. However, these companies do not have any independent right to share this information, except to the extent required by law.
- Analytics and search engine providers that assist us in the improvement and optimisation of our site; and
- Vendors, service providers, and other partners who globally support our business, such as providing technical infrastructure services, analysing how our services are used, measuring the effectiveness of ads and services, providing customer service, facilitating payments, or conducting academic research and surveys.

We may disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we may disclose your personal data to the prospective seller or buyer of such business or assets.
- If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.
- If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our [Terms of Use](#) and other agreements; or
- To protect our rights, property, or the safety of our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### **WHERE WE STORE YOUR PERSONAL DATA**

We use secure systems and buildings to hold your information and aim to keep it only as long as we need it. The data that we collect from you may be transferred to, and stored at, a destination outside the Australia. It may also be processed by staff operating outside the Australia who work for us or for one of our suppliers. The destination that the data may be stored and processed is Malaysia. These staff may be engaged in the fulfilment of your request and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

## **YOUR RIGHTS**

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You have the right to prevent such processing by contacting us at [reception@fami.com.au](mailto:reception@fami.com.au).

Our site may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

## **ACCESS TO INFORMATION**

The *Australian Privacy Principles* give you the right to access information held about you. Your right of access can be exercised in accordance with those principles and the Privacy Act.

We will take all reasonable steps to correct any information you find inaccurate. Should we deny access and or refuse to correct your personal information, we will provide you with reasons that will be based on the grounds provided by the Privacy Act. All requests for access to personal information should be made via e-mail to [reception@fami.com.au](mailto:reception@fami.com.au).

## **COMPLAINTS**

We place a high priority on effectively dealing with any complaints you might have about breach of your privacy, so if you have a concern or complaint about your privacy, let us know and we will try to fix it. We insist that complaints about breaches of the Privacy Act and the Australia Privacy Principles are made or confirmed in writing so that we can be sure about the details of the complaint. Generally, we will only accept complaints from an individual who believes an act or practice of us has interfered with their privacy and may have breached one of the Australian Privacy Principles.

A complaint should be addressed to our Privacy Officer and identify whether it is about:

- The collection, use or disclosure of personal information;
- The security or storage of personal information;
- The accuracy of personal information; or
- A refusal to give access to, change or delete personal information.

We will attempt to confirm with the complainant:

- Their understanding of the conduct relevant to the complaint;
- Their understanding of the Australian Privacy Principles relevant to the conduct; and
- What they expect as an outcome.

We will inform the person making the complaint:

- Whether we will conduct an investigation; and
- The name, title and contact details of the investigating officer.

After we have completed our enquiries, we will contact the complainant, usually in writing, to advise the outcome and invite a response to our conclusions about the complaint. If a response is received, we will assess it and advise if we have changed our view.

If the complainant is unsatisfied with the outcome after having been through our internal complaints process, there are free and independent dispute resolution services available that we can advise on, including, if appropriate, review by the Privacy Commissioner within the Office of the Australian Information Commissioner.

### **CHANGES TO OUR PRIVACY POLICY**

We may make changes to our privacy policy in the future. The most up-to-date version can be found on our website. Please check back frequently to see any updates or changes to our privacy policy. Any information collected after an amended privacy policy has been posted on our site, will be subject to that amended privacy policy.

### **CONTACT**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [reception@fami.com.au](mailto:reception@fami.com.au) or by mail to the Privacy Officer, Level 5/64 Ferny Ave, Gold Coast QLD 4217.

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