

# MUNRO PARTNERS



## Privacy Policy

Dated: May 2018



# PRIVACY POLICY

Munro Partners is committed to respecting the privacy of your personal information. This Privacy Policy sets out our personal information management practices. Munro Partners abides by the Privacy Amendment (Private Sector) Act 2001, the Australian Privacy Principles and other laws which protect your privacy. Any permitted handling of personal information under such exemptions will take priority over this Privacy Policy to the extent of any inconsistency.

Throughout this Privacy Policy, we refer to your personal information which means information which identifies you as an individual or from which your identity can be reasonably ascertained. This policy may change. We will let you know of any changes to this Privacy Policy by posting a notification on our website. Any information collected after an amended privacy statement has been posted on this site will be subject to that amended privacy statement.

References to Munro Partners, us, we and our are references to Munro Partners and Munro Asset Management Limited Ltd ABN 28 163 522 254 and its related bodies corporate. Munro Asset Management Limited is holder of Australian Financial Services Licence No. 480509 and may be required to hold personal information about investors, including, but not limited to, Anti-Money Laundering and Counter-Terrorism Commonwealth law.

## Collection of personal information

We must only collect personal information that is necessary for our functions and activities. As a financial services organisation, we are subject to legislative and regulatory requirements that we obtain and hold the personal information of clients. Information we hold about you may include things such as your contact details, bank account details and tax file numbers.

We will not collect any personal information about you unless you have knowingly provided that information to us or authorised a third party to provide that information to us. There are certain situations in which we may collect personal information about you from someone other than you. For example, we may collect personal information about job applicants from recruitment

agencies and referees. In either case, we will take any steps required by law to ensure that you are aware of the purposes for which the information is collected.

## Use and disclosure of personal information

We use and disclose your personal information for purposes related to the main purpose for which the information was collected, where you have consented to the use or disclosure, or where otherwise authorised by law. These purposes may include carrying out or responding to your requests, improving our services, communicating with you, assessing your suitability for positions with Munro Partners, purposes relating to any third party acquisition or potential acquisition of an interest in Munro Partners, or assets of Munro Partners or its managed funds, or any other purposes outlined at the time you provide the information. We may not be able to do these things without your personal information. For example, we may not be able to contact you or offer employment to you.

We may provide personal information about you to:

- service providers who assist us in providing our services and operating our business, including, but not limited to, organisations that assist us with registry, archival, research, mail and delivery, auditing, recruitment, payroll, superannuation, insurance, management consulting, financial and legal advisory, banking, security and technology services in their capacity as service providers to Munro Partners;
- where relevant, prospective employers and recruitment agencies who request verbal or written references in relation to current or former Munro Partners' personnel;
- if you are an investor, our custodian, Administrator, Unit Registry, auditors, tax advisors, investment advisers, brokers and asset consultants; and
- other third parties where required or authorised by law, which may include emergency situations and assisting government agencies. accessing and updating your personal information

To make a request to access or correct any personal information we hold about you, please contact us using the details set out below. We ask that you provide us with as much detail as you can about the



particular information you seek, in order to help us retrieve it. An access fee may be charged where permitted by law. In certain circumstances, we may not be required by law to provide you with access or to correct your personal information. If that is the case, we will give you our reasons for that decision.

We take reasonable steps to make sure that the personal information we collect, use and disclose is accurate, complete and up-to-date.

## **Notifying you**

When we receive personal information from you directly, we will take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your personal information from third parties. You may not be aware that We have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

This policy may change. We will let you know of any changes to this Privacy Policy by posting a notification on our website. Any information collected after an amended privacy statement has been posted on this site will be subject to that amended privacy statement.

## **Security of personal information**

Irrespective of whether personal information is stored electronically or in hard copy form, we must and will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure.

Additional information for users of our website

If you visit our website to read, browse or download information, our system may record information such as the date and time of your visit to the website, the pages accessed and any information downloaded. This information is used for statistical, reporting and website administration and maintenance purposes only.

Like many websites, our website may use cookies from time to time. Cookies are small text files that we transfer to your computer's hard drive through your web browser to enable our systems to recognise your browser. Cookies may also be used to record non-personal information such as the

date, time or duration of your visit, or the pages accessed, for website administration, statistical and maintenance purposes. Any such information will be aggregated and not linked to particular individuals unless required by law. The default settings of browsers always allow cookies, but users can easily erase cookies from their hard-drive, block all cookies, or receive a warning before a cookie is stored. Please note that some parts of the website may not function fully for users that disallow cookies.

While we take great care to protect your personal information on our website, unfortunately no data transmission over the Internet can be guaranteed to be 100% secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online. This is particularly true for information you send to us via email. We have no way of protecting that information until it reaches us. Once we receive your transmission, we make our best effort to ensure its security in our possession.

The website may contain links to other sites. We are not responsible for the privacy practices or policies of those sites.

## **European Union**

If you are a resident of the European Union for the purposes of the GDPR, then in addition to what is set out above, the following applies to you.

By your consenting to this Privacy Statement, Munro is able to process your Personal Data in accordance with this Privacy Statement. Our Contact details are set out in the "Further Information" paragraph below.

In providing its services to you, Munro may make use of a number of automated processes using your Personal Data and your activity on our website as tracked by us, in order to provide more tailored and relevant services to you such as providing email communications through email service provider, MailChimp <https://mailchimp.com/legal/privacy/>.

In addition to your rights set out above, you may:

- update or rectify any of the Personal Data that we hold about you, in the manner described in the "Further Information" paragraph below.;
- withdraw your consent to Munro's use of your Personal Information as described in this Privacy Statement by deleting your account. This will also delete all the



Personal Data about you which we hold. This can be done by accessing any of our newsletters, and choosing the unsubscribe button;

- request that Munro provides you with a copy of the Personal Data Munro holds about you in a portable and machine readable form; or share your Personal Data with a nominated third party;
- you may request that from us by contacting us using any of the methods set out in the “Further Information” paragraph below.

Should you have any concerns in relation to Munro’s collection and/or processing of your Personal Data, then in addition to contacting us set out below (including the right to complain to the Office of the Australian Information Commissioner), you have the right to complain to a supervisory authority (within the meaning of the GDPR).

### **Further information**

If you have any questions, concerns or feedback about privacy, please contact:

**Munro Asset Management Limited**  
Level 19  
80 Collins Street  
Melbourne VIC 3000  
Telephone +61 3 9290 0900  
Email [contact@munropartners.com.au](mailto:contact@munropartners.com.au)

