

## ALLAN GRAY AUSTRALIA PRIVACY POLICY

A reference to 'we' and/or 'us' is a reference to Allan Gray Australia Pty Ltd (Allan Gray) and its related bodies corporate and associates (such as the Orbis Group and Allan Gray South Africa). A reference to 'you' or 'your' is a reference to any person who views this privacy policy and website, and any person from whom Allan Gray has collected or collects personal information. A reference to Allan Gray Products means any funds or products available for investment (including through our website) or an investment mandate.

## OUR PRIVACY POLICY

We understand that privacy is important. So our privacy policy explains how we will handle your personal information according to the Privacy Act 1988 (Cth) and the Australian Privacy Principles, as applicable.

By accessing or using this website, or by otherwise providing Allan Gray with personal information, you acknowledge that you have read and understood this privacy policy and consent to the collection and use of your personal information according to the terms below and as may be indicated on the document through which you provide such information to us.

This privacy policy may change from time to time, without notice.

## WHAT PERSONAL INFORMATION DO WE COLLECT?

Personal information means any information that can identify you. We obtain personal information in order to provide you with our services or manage our relationship with you. This includes details such as your name, address, contact information, birth date, and nationality.

We may sometimes need to collect personal information from individuals who are not our customers/clients, for example, business contact details of a company representative or authorised signatories who we normally deal with.

Where possible, we will collect personal information from you directly. There may, however, be circumstances where we may receive and collect your personal information from third parties.

Generally, we will not collect sensitive information about you (e.g. your ethnic background, political belief, religion or health) unless such information is required for providing our services to you and with your explicit consent, or where required by law.

## HOW IS PERSONAL INFORMATION COLLECTED AND STORED?

In most cases, we will collect personal information about you:

- when you register to receive information from us
- when you register for online access to open an account and transact on it, or

- from the documents you complete in relation to Allan Gray funds to invest in, or redeem from; or
- when you provide instructions to our Client Services team or otherwise contact us. In particular, we may collect personal information to verify your identity over the phone. Calls to our Client Services line may be recorded or monitored for quality control, training, regulatory or other compliance reasons.

When you visit our website, we collect information about your visit using 'cookies'. Cookies are pieces of information that a site sends to your computer's hard disk when you access information on that site. Cookies do not identify individual users, however our servers may record information about your usage, the time of your visit, its duration, the pages you visit and style settings. We may use this information and other related site information to measure your interest in the contents provided and as such to continuously respond to your needs and improve our service.

When you access your account information online through our website, you will be re-directed to an online portal provided by a member of the OneVue Group (OneVue). OneVue has its own privacy policy. You should familiarise yourself with this policy.

Security of your personal information is important, so in storing such information we take all reasonable steps to protect it from loss or unauthorised access, destruction, use, modification or disclosure.

## HOW IS PERSONAL INFORMATION USED?

We only use your personal information for the purposes for which it was collected, such as to assist you from a client or relationship management perspective, facilitate the processing of your application, transaction or other requests and to communicate with you on an ongoing basis about your investment. Once personal information is no longer required to be retained, it is either destroyed or permanently de-identified. With your consent, we may also send you educational and marketing material about our other products and services which may be of interest to you. You can contact us at any time to ask us not to send this information to you.

In providing financial products and services, we may need to disclose your information to persons carrying out functions on behalf of Allan Gray or in respect of the Allan Gray funds. This includes:

- members within the Orbis Group or Allan Gray South Africa, some of which are located offshore in Bermuda, Canada, Hong Kong, Luxembourg, South Africa, United Kingdom and the United States. Personal information shared within the Orbis Group or with Allan Gray South Africa will be strictly used for the purposes for which it was collected and will be maintained in accordance with the [Orbis Group's Privacy Policy](#) or the [Allan Gray Limited \(South Africa\) Privacy Statement](#) instead of the Australian Privacy Principles

- third parties that perform processing, servicing functions, assist with client relationship management or otherwise support the Allan Gray business, such as the Allan Gray funds' unit registrar, the responsible entity of the Allan Gray funds, mailing houses, information technology and data storage providers, identity verification services, external consultants and auditors. Some of these third parties may be located offshore or store data overseas, and therefore will be subject to privacy and data protection laws that may differ from those of Australia. Where we have engaged a service provider, we will take reasonable steps to ensure that:
  - the service provider keeps your personal information confidential; and
  - the information is used only to the extent required to perform the services requested by us.

From time to time, Allan Gray or its third-party providers may store your information in cloud or other types of networked systems. Information stored in cloud or network-based systems can be accessed from and transferred between, various countries over the internet, and as such, it is not always practicable to know in which country your information may be held. By providing your personal information to us, you acknowledge that countries in which your information may be held will have privacy and data protection laws that may differ from those of Australia and overseas organisations may be required to disclose information that Allan Gray has shared with them, under foreign laws.

#### **CAN PERSONAL INFORMATION BE GIVEN TO ANYONE ELSE?**

We do not sell, rent or trade personal information to, or with, third parties. In some exceptional circumstances personal information may be disclosed without obtaining your consent or prior notification to you. This includes where disclosure is required by law enforcement agencies, government agencies, courts or according to applicable laws.

#### **YOUR ACCESS TO YOUR PERSONAL INFORMATION**

You can access most of the personal information we hold and request changes. However, this right is subject to certain exceptions. For example, you may be unable to obtain access to your personal information which would reveal personal information about another person, or we may be prevented by law from disclosing such information.

Please contact our Client Services team on 1300 604 604 or +61 2 8224 8604, or email [clientservices@allangray.com.au](mailto:clientservices@allangray.com.au) if you:

- have any questions about this privacy policy;
- wish to access or correct your personal information that we hold; or
- would like to make a complaint about the way in which we have handled your personal information.