



Invesco Australia Limited

Privacy Policy

About this Privacy Policy

At Invesco Australia Limited ("Invesco") we value the privacy of your personal information.

- Personal Information refers to information or an opinion about an individual whose identity is apparent from the information stored. It includes your name and contact details.
- Invesco is bound by, and committed to supporting, the 13 Australian Privacy Principles ("APPs") set out in the Privacy Act 1988 (Cth).
- The following statement outlines how we collect, maintain and handle your personal information according to the APPs.

Collecting Personal Information

Why do we collect your personal information?

We collect your personal information in order to undertake investments, on your behalf, in Invesco funds as well as to provide you with information about other products and services that may be of interest to you.

What kind of personal information do we collect?

We may collect some or all of the following personal information for the purposes set out in this Privacy Policy:

- Name
- Date of Birth
- Contact details, such as telephone number, address and email address
- Tax File Number, exemption reason or country of residence
- Bank account details
- Authorised Representative information
- Investment Instructions
- Feedback queries
- Website usage details

If you do not provide the personal information requested Invesco may not be able to accept or process your application, undertake investments on your behalf or provide you with information about our products and services.

How do we collect and hold personal information?

Invesco collects personal information via application forms, telephone, fax, email, feedback forms and online (including via its website). Where practicable, Invesco will collect personal information directly from you via one of these methods.

We may receive personal information from third parties that you have authorised us to deal with. This could be a financial adviser, broker or other representative, such as an executor or administrator. If you provide us with personal information of another person (such as your authorised representative), you should let that person know that their information has been provided to Invesco and will be handled by us in accordance with this policy.

We may hold the information that we have collected in both physical and electronic storage facilities, including paper based files or computer databases.

Use and Disclosure of Personal Information

For what purposes do we use personal information?

Generally, Invesco will only use and disclose personal information for the purpose it was collected. The main reason for collecting personal information is to enable Invesco to provide investment products and services to you.



We may also use and disclose personal information for other related purposes which we consider an individual would reasonably expect. These purposes include administration and providing services to you in relation to investment products. Administration includes monitoring, auditing, evaluating, modelling data, dealing with complaints, answering queries and providing services in relation to investment products.

Who may we disclose information to?

Within Invesco

Invesco may share your personal information with its employees, contractors or agents for the purposes of operating our investment business, responding to and fulfilling requests made by you and to otherwise provide our products and services to you.

Direct marketing

We may send you direct marketing communications and information about our products and services that we consider may be of interest to you. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the Spam Act 2003 (Cth). If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so. In addition, at any time you may opt-out of receiving marketing communications from us by contacting us (see the details below) or by using opt-out facilities provided in the marketing communications and we will then ensure that your name is removed from our mailing list.

We do not provide your personal information to other organisations for the purposes of direct marketing.

Authorised Representatives

If you have nominated an Authorised Representative and/or a broker on your application form, Invesco may also share your personal information (other than tax file number information) with your Authorised Representative and/or broker.

Invesco Group

Invesco operates as a global organisation and to this end, functions generally operate from a dedicated centre which also provide shared services around the globe. Typically, personal information collected in relation to an investment in our products may be disclosed to one of our offshore offices. Personal information (generally other than personal information held in relation to individual investors) may be held within applications on our portfolio management system or client relationship management system which are potentially accessible by our offshore offices. Key data is held at locations in Australia, United States, United Kingdom, Germany and India, either at an Invesco related party site or third party site. This list may be updated from time to time.

We take reasonable steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information.

Account Administration

Invesco may also share your information with service providers who provide outsourced services to Invesco or another member of the Invesco Group. Those members of the Invesco Group and Invesco's service providers may be located outside Australia (where privacy obligations may differ), including in the United States, the United Kingdom and India.

The types of outsourced service providers that may be provided with your personal information and the circumstances in which your personal information may be shared include:

- administrators which provide fund accounting, unit registry and other services to Invesco;
- printers and other companies for the purposes of preparation and distribution of statements and for handling mail;
- legal and accounting firms, auditors, contractors, consultants, agencies and other advisers for the purpose of administering, and advising on, the product and for any associated actions; or
- in certain circumstances and with safeguards to respect your privacy, Invesco may also disclose your personal information to any person to use in relation to a proposed or actual purchase of an interest in Invesco or any part of Invesco's business.



Cloud Services

Invesco uses third party "Cloud" service providers for data storage with such servers located in the United States. Invesco maintains effective control of the information held in "Cloud" storage under contractual arrangements that reflect the standards of Australian Privacy Law.

Some third-party service providers listed above also utilise Cloud services for their own data management. Where this occurs, Invesco takes reasonable steps to ensure data held by third parties is managed in accordance with the Australian Privacy Law.

By Law

Invesco may also disclose your personal information to other entities or persons as required by law. For example, information may be provided to government regulators or as required by a court order.

With your Consent

We may also disclose your personal information where you have consented.

Security of personal information

Invesco takes reasonable steps to protect the personal information that it holds from misuse or loss and from unauthorised access, modification, and disclosure. Invesco has implemented security measures to protect the personal information that it holds, including requiring use of passwords, user logins, and other security procedures. Developments in security and encryption technology are reviewed regularly. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

Quality of personal information

It is important to us that the personal information which we hold is accurate, complete and up to date. If any of the details you provide change or you believe that the personal information we hold about you may be inaccurate or incomplete then please contact our Client Services Team on 1800 813 500.

You may request access to any personal information Invesco holds about you. Where we hold information that you are entitled to access, we will try to provide you with suitable means of accessing it (for example, by mailing or emailing it to you). In normal circumstances we will give you full access to your information.

However, there may at times be a legal reason to deny access. If access is denied we will tell you why. If you believe that any personal information we hold about you is incorrect, incomplete or inaccurate, then you may request that we correct it. We will consider if the information requires correction.

Notifiable Data Breaches ('NDB') Scheme

Invesco is fully compliant with the data breach notification obligations that arise when a data breach is likely to result in serious harm to any individuals whose personal information is involved in the breach. Invesco has a Data Breach Response Plan which is complemented by the Invesco Cyber Incident Response Playbook. These procedures are known and understood by Invesco's employees so that employees understand their roles and responsibilities should a notifiable breach occur.

Contact us

If you have any further questions relating to this privacy statement, or concerns about the way in which we have handled your personal information collected by us, please contact our Privacy Officer, via our client services team - [click here](#) for contact details.

Complaints

Invesco treats any complaints about our handling of personal information seriously. If you believe that your privacy has been breached, please contact us using the contact information below and provide details of the incident so that we can investigate it. We will treat your complaint confidentially. We will fully investigate any complaint you lodge with us and seek to provide a response within a reasonable time (and in any event within the time required by the Privacy Act, if applicable).



If you are not satisfied with the outcome of the complaint you may lodge a formal complaint with the Office of the Australian Information Commissioner.

Changes to our privacy policy

We may change this policy from time to time. Any updated versions of this privacy policy will be posted on our website and will be effective from the date of posting.

Version

Version	Revision Date	Summary of Changes
1.0	28 Apr 2014	Initial Approved Version
2.0	23 Jun 2017	Revision to reflect APPs
2.0	22 Feb 2018	Policy Reviewed by Risk Management Committee
3.0	20 Dec 2019	Revision to reflect use of "Cloud" services
4.0	18 Feb 2020	Revision to reflect service providers "Cloud" use