

PRIVACY POLICY

(Last reviewed and updated: February 2018)

1. Introduction

Principal respects the right of our clients to privacy. Our privacy policy ensures we protect the trust you place in us when you provide us with your personal information.

Our Privacy policy reflects the spirit and content of the Australian Privacy Principles of the Privacy Act 1988.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this privacy policy. In the event of any inconsistency between the provisions of this privacy policy and those additional materials, the provisions of the additional materials will prevail.

In this privacy policy, “PGIA” “we”, “us” or “our” means Principal Global Investors (Australia) Limited.

2. What is personal information?

By 'personal information' we mean information, or an opinion about an individual whose identity is apparent or can be reasonably ascertained from the information or opinion.

3. What information we collect

We only collect personal information that we need in order to provide our services and offer our products to you or to fulfil a legal requirement. For example, before we can provide a financial service or product to you the Anti-Money Laundering and Counter Terrorism Financing Act 2006 requires that we verify your identity. To do this we must collect personal information from you.

The kind of personal information we may collect generally includes:

- your name, address and other contact details
- date of birth
- job title
- tax file number
- financial information
- employment history
- educational qualifications
- information contained in identity document, such as a passport number and drivers licence number; and
- information necessary to make or receive payments to or from you or necessary to effect security transactions on your behalf.

In certain circumstances, for example if you apply for a job with us, we may also collect personal information which is considered sensitive information. This may include membership of a professional association or a trade union, criminal record etc. Unless the collection of

sensitive information is required or permitted by or under law, we will obtain your consent before obtaining it.

If you do not provide the personal information we request we may not be able to provide the products or services you have requested.

4. How we collect and hold your information

As far as practical, we collect personal information about you directly from you and always through fair and lawful means. How we collect your information will depend upon how you interact with us.

Personal information may be collected by us on our products' application or redemption forms and any associated documents (eg. an authorised signatories list) you complete or when you call us or correspond with us via our website, by email or mail, or through contact with your consultant or you in person.

On occasions, we may also obtain personal information about you from a third party. This may include:

- through a service provider such as a recruitment company appointed to source candidates for a role;
- where an institutional client has applied for a product or a service and the details of the institutional client's officeholders, account signatories and/ or beneficiaries are provided to us by the individual applying on behalf of the institutional client;
- our related companies, agents and service providers which may be located overseas;
- law enforcement, statutory and regulatory bodies;
- publicly available sources including the Internet and telephone directories; or
- industry databases.

If at any time you provide us with personal information about another person, you acknowledge that you will ensure that the person has been notified of all relevant matters required under the Privacy Act relating to our collection of such information and has consented to the collection, use and disclosure of their personal information by us as set out in this privacy policy.

Your personal information may be held by us or our service providers in the following forms:

- paper records;
- computer systems including email, servers, hard drives and applications;
- data storage systems; and
- in certain circumstances, in sound recordings of your telephone discussions with us.

5. The Use and disclosure of your information

We may use your personal information to:

- provide you with information and advice about products and services that may be of interest to you;
- assess and process any applications/redemptions for our products or services;
- administer and manage the products and services we provide to you, including carrying out systems testing and auditing;
- provide extra information such as financial market updates or inviting you to events that may be of interest to you;

- conduct sales and marketing analysis;
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- handling complaints and managing legal matters and litigation;
- fulfil our legal or regulatory obligations such as to identify and verify you, as we are required to under the Anti-Money Laundering and Counter Terrorism Financing Act, or when considered necessary by us to comply with any law, regulation, court order or requirement of a regulatory or self-regulatory body, tax authority or industry bodies;
- assessing and processing employment applications and conducting due diligence as part of pre-employment screening
- any other purpose in connection with or relating to the business or dealings of PGIA.

We may disclose your personal information to the following parties:

- third parties we appoint as agents or external service providers, who supply administrative, financial or other services, including the Custodian, auditors, mailing houses, registries, legal advisers or cloud data storage providers;
- third parties you authorize to act on your behalf in relation to your investment such as an investment consultant, financial adviser, broker or solicitor;
- companies or other related entities of the Principal Financial Group (some of which may be located overseas – refer below for more information);
- employees, agents, subcontractors, insurers, consultants, exchanges, repositories, depositories, clearing houses, affiliated or unaffiliated providers of outsourced or other services in connection with provision of services or products or otherwise in connection with the operation of our business; and
- any person to the extent necessary, in our view, in order to carry out the instructions you give to us.

There may also be times when we are required by law to provide your information to regulators, such as the Office of the Australian Information Commissioner (OAIC), Australian Securities and Investments Commission, Australian Transaction Reports and Analysis Centre, the Australian Taxation Office or other relevant parties.

Personal information collected by any member of the Principal Financial Group may be disclosed and shared between other members of the Principal Financial Group and may (unless you tell us not to) be used for the respective marketing purposes of the members of the Principal Financial Group. You can request not to receive this additional material by contacting us at the details listed below in section

10. Access to your personal information.

We may also disclose your personal information to other persons as permitted under the Privacy Act 1988.

6. Disclosing information overseas

Principal Global Investors (Australia) Limited is part of Principal Global Investors, a global financial services organization that operates in and provides services and products to clients through, and with the support from affiliates and subsidiaries located in multiple jurisdictions.

In some cases, we may need to disclose your personal information to related companies, affiliates, agents or contractors located outside Australia. The countries in which these recipients may be located will vary from time to time, but may include Brazil, Chile, China, Hong Kong, India, Japan, Malaysia, Singapore, United Kingdom, United States and other countries where the Principal Financial Group has a presence (for a list of these locations, visit our website at <https://www.principal.com/about-us/our-company/company-overview/worldwide-locations>).

In all cases, by providing your personal information to us or using our services, you consent to the disclosure of your personal information outside Australia as set out in this privacy policy, and acknowledge that Principal Global Investors (Australia) Limited is not required to ensure that overseas recipients handle your personal Information in compliance with Australian privacy law. However, where practicable in the circumstances, Principal Global Investors (Australia) Limited will take reasonable steps to ensure that overseas recipients use and disclose such personal Information in a manner consistent with this Privacy Policy.

7. What and how we collect information from our website

In addition to collecting personal information from you when you send us an email through our website we also collect anonymous, non-personally identifiable information when you browse through the pages of the website, read or download information. We use “cookies” to collect such information.

“Cookies” are used to store information on your computer and are a way to have your web browser “remember” specific bits of information about your previous visits to our site. Cookies do not spy on you or otherwise invade your privacy, and they cannot invade your hard drive or steal information. Cookies are facilitated through third-party companies, including AddThis, Google Analytics and other similar companies and help us measure the performance of our online advertising campaigns and analyse visitor activity on our websites.

The information collected may include information such as what time you visited our website, how long you were on our site, if you've been to the site before, what web pages you visited, and what type of browser you used to access our website. This information helps us identify ways to modify and improve our website and to provide quicker and more effective access to the various components of the website.

8. Securing your information

We take all reasonable steps to protect all of the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure. These include

- restricting access to our premises by security pass
- requiring staff to comply with confidentiality requirements

- having a formal agreement in place with an appointed document storage and destruction provider which includes obligations for the secure storage and destruction of information
- having policies in place for the retention of documents
- storing certain information on a password protected electronic database, which may be on our data server infrastructure
- backing up electronic information – information is written to drives which are stored offsite, but still managed by our personnel

When we are no longer required by law to keep your personal information, it is destroyed in a secure manner.

9. Dealing with us anonymously or under a pseudonym

We are required under the law to identify and verify you when you first make an application into one of our Funds and periodically, whilst you remain a unitholder with us. This means that you cannot deal with us anonymously. However, once we have identified and verified you, you can choose to use a pseudonym when dealing with us. Please let us know if you would like to operate under a pseudonym.

10. Access to your personal information

As an individual you have a right to request access to your personal information. We are happy to provide you with your information in any reasonable and practical manner you request within a reasonable time, unless there is a legal or other reasonable reason that prevents us from doing so. In the event we are unable to provide you with access to the personal information we hold on you, unless we are unable to do so, we will inform you of the reason(s) for refusing access.

We may charge a fee for providing access to your personal information.

If you would like to access your personal information, please contact us by:

- mail at Privacy Officer
 Principal Global Investors (Australia) Limited
 GPO Box 4169
 Sydney NSW 2001
- phone at +61 2 8226 9000
- email by clicking this [link](#)

11. Changing your personal information

We try to ensure that all personal information is accurate, complete and current. To assist us with this, you should contact the Privacy Officer through one of the methods listed above, if your personal information changes or if you believe that the personal information we have is not accurate or complete.

Only employees of the Principal Financial Group and those who perform services on our behalf, who are authorized to handle personal information, will have access to it.

If you request a correction to the personal information we hold about you and we consider that we are not able to correct the personal information in the manner you have requested,

then, unless we are unable to do so, we will inform you of the reason(s) for refusing to correct the personal information.

12. Concerns

If you believe that we have breached your privacy or have a privacy concern please contact our Privacy Officer using the contact details outlined above.

The Privacy Officer will review your concern and endeavour to resolve the situation within a reasonable time of receiving the letter.

If you are still not satisfied with our response you may contact the OAIC on 1300 363 992.

OAIC can receive privacy complaints through:

- the online Privacy Complaint form
- by mail (If you have concerns about postal security, you may wish to consider sending your complaint by registered mail)
- by fax
- by email (note: email that is not encrypted can be copied or tracked).

Please follow the link for more information on making a complaint through OAIC, <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>.

We regard privacy as a right not a privilege and will do all we can to respect the trust you have placed in us.

13. Additional information on Privacy

Please note that this privacy policy may change from time to time. You may at any time request a current copy from the Privacy Officer or access it from our website <https://www.principalglobal.com/documentdownload/24176>. We encourage you to review our privacy policy periodically for any changes.

If you have any questions about your privacy please contact us using the contact details outlined above.

For additional general information on privacy and the protection of privacy, visit the Office of the Australian Information Commissioner's website at <http://www.oaic.gov.au>.