

PUTNAM INVESTMENTS AUSTRALIA PTY LTD

PRIVACY POLICY

Introduction

Putnam Investments Australia Pty Limited (“Putnam”) is committed to protecting your privacy and your personal information and aims to maintain a high standard of compliance with the Commonwealth’s Privacy Act 1988 and the Privacy Amendment (Notifiable Data Breaches) Act 2017.

This Privacy Policy describes:

- the manner in which Putnam collects your personal information;
- the main purposes for which we use that information;
- how you can access or update any personal information that we hold about you; and
- how to contact us.

Your personal information

Putnam may collect any of the following information about you:

- gender, date of birth and nominated beneficiaries;
- contact details;
- employment details such as your salary, superannuation contributions and employment status;
- accounting records;
- Tax File Number and taxation records;
- Statements of financial position regarding assets and liabilities;
- attitudes to investment risks;
- estate planning related information for example next of kin and family details; and
- charitable foundation related information.

We may also need to ask you for other personal information to enable us to provide you with an appropriate level of service.

How we collect and hold personal information

When you become a client of Putnam, most of the personal information about you is collected by us either directly from you or indirectly from your accounting, taxation, investment, estate or legal advisers.

We take reasonable steps to ensure the personal information we collect about you is held securely and protected from misuse, interference, loss and from unauthorised access, modification or disclosure.

How we use your personal information

Any personal information we collect may be used to:

- verify your identity;
- provide you with information about products and services that you may determine meet your needs;
- help us administer and improve our products and services; or
- any other purpose related to providing you with our products and services; and
- provide you with updates and other information about our activities and general promotional material which we believe may be of interest to you.

When we disclose your personal information to third parties

There are some instances when we need to provide your personal information to third parties. Sometimes we need to outsource some of our administrative and related functions to external organisations. We may also need to seek assistance from lawyers, auditors and other advisors.

Similarly, we may need to provide details of your personal information to your own financial advisors, brokers or other professionals who are acting for you. We may also need to provide your details to the Australian Taxation Office and other government bodies as required by law.

Some of the entities we share personal information with may be located in, or have operations in, other countries. The countries to which your personal information could be sent are currently the United States of America. 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.

We do not sell your personal details to other organisations. We may however use or disclose the information about you to assist us with internal marketing and research. If you do not wish Putnam to promote and market its products and services to you, please call 02 8864 8150.

Help us to ensure that we hold accurate information

Putnam takes all reasonable precautions to ensure that the personal information it collects, uses and discloses is held securely, is accurate, complete and up-to-date. However, the accuracy of that information depends to a large extent on the information that you provide.

Therefore, we recommend that you:

- advise Putnam if there are any errors in your personal information; and
- update us on any changes to your personal information such as change of name or address.

You can correct or update any of your personal information by writing to us at the below address. We will not charge you for making a request to correct or update your personal information.

You can access your personal information

You have a right to access your personal information held by us, subject to some exceptions allowed by law. If you wish to access your personal information, please make a request in writing and send it to:

Putnam Investments Australia Pty Limited
Level 13,
167 Macquarie Street,
Sydney, NSW 2000,
Australia

We may charge you a reasonable fee to recover our costs for providing access based on the quantity of material and time involved in providing access. However, we will not charge you for simply making a request for access.

How to contact us

If you have any questions in relation to privacy please contact 02 8083 9900 from 9.00am to 5.00pm Monday to Friday.

You can also write to us at the address listed or contact us by facsimile on 02 8083 9905.

We have established procedures to properly consider and address any complaint you may have. If you wish to make a complaint about any of our products or services, please write to our Complaints Officer at the address listed above.

If you are not satisfied with our response to your complaint, further assistance may be available from the Office of the Australian Information Commissioner or the Australian Financial Complaints Authority Limited. Their contact details are as follows:

Office of the Australian Information Commissioner
Post: GPO Box 5218, Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au

Australian Financial Complaints Authority Limited
Post: GPO Box 3, Melbourne VIC 3001
Phone: 1800 931 678
Email: info@afca.org.au
Website: www.afca.org.au