

# Morningstar Australia

## Privacy Policy

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This Privacy Policy was last updated on 5 March 2018.

### Your privacy is important

In this Privacy Policy:

- ▶ "Morningstar", "us" or "we" refer to Morningstar Australasia Pty Limited, Morningstar Investment Management Australia Limited ("Morningstar Investment Management"), and Morningstar Research Limited, subsidiaries of Morningstar, Inc.; and
- ▶ "you" refers to any person or client about whom we collect or hold Personal Information.

We recognise that maintaining the privacy of your Personal Information matters to you, and are committed to protecting your Personal Information.

This Privacy Policy outlines how we collect, use, protect, and disclose your Personal Information. It also explains how you can access and have it amended, as well as who you can contact should you have an enquiry or complaint.

This Privacy Policy applies to information we hold that is collected both in Australia and New Zealand. Unless specified otherwise, this Policy applies to all Personal Information that we receive from or about you.

### Definitions

**Australian Privacy Principles** ("APPs") under the Privacy Act 1988 (Australia) and **Information Privacy Principles** ("IPPs") under the Privacy Act 1993 (New Zealand) regulate the way in which agencies and organisations may collect, store, use, or disclose an individual's Personal Information in the relevant country.

### Under Australian Law

#### "Personal Information"

means information or an opinion (whether or not true, and whether or not recorded in a material form) about an identified individual, or about an individual who is reasonably identifiable.

**"Sensitive Information"** is personal information that is:

- (a) information or an opinion about an individual's:
  - (i) racial or ethnic origin; or
  - (ii) political opinions; or
  - (iii) membership of a political association; or
  - (iv) religious beliefs or affiliations; or

- (v) philosophical beliefs; or
- (vi) membership of a professional or trade association; or
- (vii) membership of a trade union; or
- (viii) sexual orientation or practices; or
- (ix) criminal record; or
- (b) health information about an individual; or
- (c) genetic information about an individual that is not otherwise health information; or

### Under New Zealand Law

**"Personal Information"** means information about an identifiable individual (whether or not recorded in a documentary form).

### Personal Information we collect

The types of Personal Information we collect from you will depend on the product or service you receive from us. We provide investment information, investment management and consulting services, research, ratings, data and tools to both individuals and businesses.

The Personal Information we may collect from you includes, but is not limited to:

- ▶ Your name, phone number, street address and/or email address
- ▶ Your credit card number or bank account details
- ▶ If you are acting on behalf of your employer, your job title, employer's name and contact information
- ▶ Demographic information, such as age bracket, investor type and how you heard about us
- ▶ A password (when you establish an online subscription)
- ▶ Information regarding your security holdings (for example, when you use certain tools)
- ▶ If you are a Morningstar Investment Management Investor or a Morningstar Next Investor, your TFN and depending on your legal structure, Personal Information about trustees/beneficial owners or other information required by anti-money laundering legislation.
- ▶ Personal website usage information, including cookies and other information about your computer, device and browser.

Where our clients are corporations, we may collect Personal Information from that corporation about different contact persons within the corporation including name, job title, and contact information.

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We do not adopt Commonwealth Government identifiers, such as a tax file number, a Medicare number, or a New Zealand IRD number, as a means of identifying individuals.

### **Job Applicants and Contractors**

When applying for a position or a contract with us, we also collect Personal Information necessary for us to perform functions related to recruitment, hiring and contract management. The Personal Information we collect may include that information already listed above as well as education history, qualifications, previous employers, citizenship status, membership of professional organisations and referee contact details.

Depending on your advancement in the recruitment process we may also collect Personal Information (which might include sensitive information) from you in job interviews or telephone conversations and from your referees or from our own suppliers, including to verify your citizenship status, visa details, qualifications, references and other Personal Information that you give us.

Where you are being engaged as a consultant or contractor to Morningstar, we may also collect additional Personal Information such as your Australian or New Zealand Business Number and professional and/or public liability insurance details.

Where the consultant or contractor is a corporation we may also collect additional Personal Information about its directors, managers, or contact persons which could include names, job titles, business and personal addresses and phone numbers.

### **Personal Information: Why we collect it**

We may collect, store, use, and process Personal Information where necessary to provide you with our products and services or the products we distribute, to supply other administrative services (e.g. administering your account, to fulfilling our obligations under anti-money laundering legislation), to perform functions related to our recruitment process, to respond to inquiries, and – unless you have let us know that you do not want us to do this - to provide information about other products and services that we, our related companies or our advertisers/marketing partners offer from time to time (direct marketing), including via third party websites (remarketing).

### **Personal Information: How we collect it**

We will collect Personal Information directly from you, unless it is unreasonable or impracticable to do so, or is otherwise permitted by law. The Personal Information we collect may be captured from a variety of sources including, but not limited to:

- ▶ direct contact with us or use of our website
- ▶ voluntary submissions (e.g. responses to surveys, requests for information on our products or those of our advertisers/marketing partners)
- ▶ registrations/applications to receive our products or services or the products we distribute
- ▶ public registers (e.g. where we need to check Personal Information independently of you for anti-money laundering purposes)
- ▶ if you apply for a position or contract with us, via our application website or from a recruiter that refers you to us

While some contacts with us such as general enquiries may be made anonymously or by using a pseudonym, if the relationship is to progress any further (by you becoming our client or having a business relationship with us) it will be necessary for us to know who you are to enable us to deliver our services to you. Similarly, we cannot deal with complaints made anonymously or by pseudonym.

### **Where a third party gives us information about you**

Should a third party give us unsolicited Personal Information about you, we will within a reasonable period determine whether or not we could have collected the information directly from you or if it is in a public record and, if not, we will take reasonable steps to destroy or de-identify that information unless the law otherwise permits or requires.

### **Use of and access to your Personal Information by others**

Generally, we will not make the Personal Information gathered using our products and services or during our recruitment process available to anyone outside Morningstar or its related companies - except as agreed or instructed by you or where required by or permitted by law. Where we distribute a third party's product, we will provide any Personal Information you provide as part of the application process for the third-party product to that third party.

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Morningstar's related companies include our parent company Morningstar, Inc. in the United States and related companies worldwide. These related companies are located in: Belgium, Brazil, Canada, Chile, China, Denmark, Finland, France, Germany, Hong Kong, India, Italy, Japan, Luxembourg, Mexico, The Netherlands, New Zealand, Norway, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, Taiwan, Thailand and the United Kingdom.

It may be necessary for our third-party service providers to access your Personal Information in order to perform contractually specified services on our behalf. We will do everything reasonably within our power to prevent unauthorised use or disclosure of your Personal Information in such circumstances. Generally, Morningstar contractually requires that all Personal Information accessed by such providers be kept confidential and in accordance with the APPs or IPPs, where relevant.

#### **Use of cookies**

A cookie is a small file which can be downloaded on a device when you access our website and is then sent back to our website each time you access our website. Cookies may collect and store your information. Cookies are useful because they allow us to recognise your device and your user preferences.

We use cookies to set users' preferences, gather basic tracking information (such as login and password, date, time of visit and preferences), and monitor the presentation of our site. This information allows us to personalise your experience and improve the quality of our site and our information on third party sites.

We also use analytical cookies, which allow us to recognise and count the number of users on our website and how users move around the site. This helps us make sure users can easily find what they need.

Tracking cookies are used to provide content that is relevant to your interests. Advertisers on our website may also deploy cookies and web beacon technology to measure and improve advertising for their clients.

You can control how cookies are used on your device by changing your browser settings.

Please note some of our services may not function properly if your cookies are disabled. The use of cookies on our website or on other sites that use Morningstar information does not identify you or provide access to your device.

#### **Direct marketing**

We may use your Personal Information for marketing and promotional purposes including to provide you with information about other products and services that we, or other Morningstar related companies, or our advertisers/marketing partners, offer from time to time (direct marketing). We will not use Personal Information we have collected about you via our recruitment process for Direct Marketing.

You may ask us to let you know the source of your Personal Information used by us for direct marketing. So long as a response is not impracticable or unreasonable, then unless non-disclosure is permitted or required by law, we will endeavor to reply to you within a reasonable period without cost to you.

If you do not want your Personal Information used for direct marketing purposes by us or our related companies or our advertisers/marketing partners, please contact us on the details provided below.

#### **Remarketing**

We may also use your Personal or related Information to advertise our services to you when you visit other websites that have the necessary functionality. Morningstar and our service providers such as Google use cookies to show advertisements relevant to your past usage of our website.

You can control cookies on your device as mentioned above or opt out of cookies on the [Network Advertising Initiative opt-out page](#).

If you have any problems, contact us on the details provided below.

This Privacy Policy was last updated on 5 March 2018.

### Links to other websites

Our website may contain links to other websites for you to access. You should be aware that the privacy policies of the operators of those other sites may not be the same as ours and you should refer to their own privacy policies.

### Protection of your Personal Information

We will take all reasonable steps to ensure that any Personal Information about you which we hold is:

- ▶ **Secure:** protected from misuse, interference and loss and from unauthorised access, modification or disclosure; and
- ▶ **Appropriate:** accurate, complete, up-to-date, relevant and not misleading having regard to the purpose for which it is held and may be used.

Your Personal Information may be kept in various formats by us, our related companies and relevant third party providers.

The Morningstar Group operates secure data networks protected by industry standard firewalls and password protection systems. Our security and privacy policies are periodically reviewed and enhanced as necessary and only authorised individuals have access to the information provided.

We restrict access to Personal Information to our employees, and contracted third party providers who need to know that information in order to process it for us and who are subject to strict contractual confidentiality obligations. They may be disciplined or their contract terminated if they fail to meet these obligations.

We may need to maintain records for a significant period of time but will destroy or de-identify Personal Information if we no longer need it for any authorised purpose and are not required by law to retain it.

### Access to your Personal Information

We will handle all requests for access in accordance with the APPs and, where relevant, the IPPs.

In most cases, we will confirm whether or not we hold Personal Information about you and give you access to any such Personal Information within a reasonable period of time and in the manner you request, provided that request is reasonable.

In some cases, we may refuse access where refusal is required or permitted by law. Without limitation, we may reject requests that are unreasonably repetitive, require disproportionate technical effort (for example, information that is only available on older back up tapes, or would involve developing a new system or significantly changing an existing practice), or which risk the privacy of others. We will provide you with reasons for any refusal.

We will respond to your request within a reasonable period of time and in accordance with legal requirements.

We may charge a reasonable fee for giving you access to your Personal Information, however at present we do not propose to make any such charge.

To request access to your Personal Information please contact our Privacy Officer – contact details are below.

### Accuracy of your Personal Information

We appreciate any assistance you might give us to keep any Personal Information that we hold about you up-to-date, complete and accurate. If you want to update your Personal Information, you may do so by accessing the personal account information on the relevant website or by contacting us:

#### Morningstar.com.au subscribers

Tel: 1800 03 44 55

Email: [help.au@morningstar.com](mailto:help.au@morningstar.com)

#### Advisers/Institutions/Others

Tel: +61 2 9276 4446

Fax: +61 2 9276 4545

Email: [helpdesk.au@morningstar.com](mailto:helpdesk.au@morningstar.com)

#### Morningstar Investment Management Clients and Investors

Tel: +61 2 9276 4550

Email: [investor.services@morningstarinvestments.com.au](mailto:investor.services@morningstarinvestments.com.au)

#### Morningstar Next Investors

Tel: 1800 316 544

Email: [support@morningstar.com.au](mailto:support@morningstar.com.au)

#### Job Applicants and Contractors

Tel: +61 2 9276 4415

Email: [askhr@morningstar.com](mailto:askhr@morningstar.com)

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We will, on request, normally amend any of your Personal Information which is inaccurate, incomplete, out-of-date, irrelevant or misleading where:

- ▶ we are satisfied that the information needs to be corrected; and/or
- ▶ we agree with your request that the information be corrected.

If we disagree with your request, we will write to inform you of our concerns about making the change you have requested, giving reasons for our refusal and notifying you of available complaint mechanisms. If you wish, we will then, take reasonable steps to associate with the appropriate records of your Personal Information, in such a manner that it will always be read with your Personal Information, a statement that you claim the information is inaccurate, incomplete or out-of-date (whichever is relevant) and that you have requested a particular change. For New Zealand Personal Information this may include a statement that you have provided the correction sought.

We will respond to your request within a reasonable period of time and in accordance with legal requirements. We will inform you of any action taken as a result of your request.

Where permitted by law we may charge a reasonable fee for dealing with requests, but do not propose to do so at present.

### Complaints process

If you have a complaint about how we handle your Personal Information, please contact our Privacy Officer as described below.

The Privacy Officer will acknowledge your complaint within three business days of receipt and will seek to resolve your complaint within 30 days of receipt.

### Morningstar Privacy Officer Contact Details

#### Privacy Officer

Morningstar Australasia  
Level 3,  
International Tower 1  
100 Barangaroo Avenue  
Barangaroo, NSW 2000, Australia

Tel: +61 2 9276 4532  
Email: [aprivacy@morningstar.com](mailto:aprivacy@morningstar.com)

For Australian clients, if your complaint is not resolved to your satisfaction or we have not responded to you within 30 days you have the right to contact the Australian Information Commissioner.

#### Office of the Australian Information Commissioner

GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Facsimile: +61 2 9284 9666

For New Zealand clients, if your complaint is not resolved to your satisfaction you have the right to contact the New Zealand Privacy Commissioner.

#### The Office of the Privacy Commissioner

PO Box 10094  
The Terrace  
Wellington 6143

Phone: 0800 803 909  
Email: [enquiries@privacy.org.nz](mailto:enquiries@privacy.org.nz)  
Facsimile: +64 4 474 7595

### Copies of this policy and further information

If you wish to obtain a free copy of this Privacy Policy (by post or email) and/or more information about the way that we handle your Personal Information, contact our Privacy Officer.

### Your Consent

By using Morningstar's products and services or products we distribute, or by applying for a position or contract with us, you consent to the collection, use and disclosure of any Personal Information and any related information in the manner described in this Privacy Policy.

### Changes to the Privacy Policy

As the Australian and New Zealand Governments introduce new privacy legislation, this Policy will be reviewed and updated accordingly. We will also regularly review this Policy and may change it from time to time. We encourage you to review this Policy on a regular basis so that you will be aware of any changes to it. The date at which this Policy was most recently updated is given above.

This Privacy Policy was last updated on 5 March 2018.

### **Interpretation**

If at any time (for example because of changes to legislation) this Privacy Policy is not consistent with applicable privacy legislation, the legislation overrides this Policy to the extent of the inconsistency.

### **Further information**

For Australian clients, further information on privacy legislation is available from the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au)

For New Zealand clients, further information on privacy legislation is available from the Office of the Privacy Commissioner at [www.privacy.org.nz](http://www.privacy.org.nz)