

Morningstar Australia Privacy Policy

Morningstar Australasia Pty Ltd

Level 36, Australia Square
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Sydney NSW 2000
Australia
ABN: 95 090 665 544
AFSL: 240 892

This Privacy Policy was last updated on
12 April 2016

Your Privacy is Important

This Privacy Policy describes how Morningstar Australasia Pty Limited ABN: 95 090 665 544, AFSL: 240 892 ("Morningstar," "us" or "we"), a subsidiary of Morningstar, Inc., collects, processes and handles your Personal Information.

Morningstar recognises that maintaining the privacy of your Personal Information matters to you, and is 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 inquiry or complaint.

Morningstar has a separate Privacy Policy in relation to Job Applicants and Contractors. A copy of this policy is available upon request from the Privacy Officer or at www.corporate.morningstar.com/au

Definitions

Australian Privacy Principles ("APPs") are part of the Privacy Act 1988 and regulate the way in which organisations may collect, use or disclose an individual's Personal Information.

Personal Information means information or an opinion (whether or not true, and whether or not recorded) about an identified individual, or about an individual who is reasonably identifiable.

Personal information that relates to an individual's own characteristics, beliefs or affiliations is known as 'sensitive information' and will only be collected with your consent or when it is required by law and related information means information you provide which is not readily identifiable as being connected with you.

Personal Information We Collect

The types of Personal and related Information we collect depend on the product or service you receive from us. We provide investment information, research, ratings and tools to both individuals and businesses. We may ask you for:

- ▶ Your name, phone number, street and 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).

Where clients are corporations, they may provide us with Personal Information about different contact persons within that corporation including name, job title, and contact information.

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

Personal Information: Why We Collect It

We may collect, store and process Personal and related Information to provide you with investment information and tools, to allow you to use our products and services, to supply other administrative services (e.g. setting up new accounts), to respond to inquiries, and—unless you have let us know that you do not want us to do this—to provide you with 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. The Personal Information and related 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 products or services.

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 a client or having a business relationship with us) it will be necessary for us to know who you are. 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 it is in a Commonwealth record and, if not, we will take reasonable steps to destroy or de-identify that information unless the law otherwise requires.

You have the right to ask us to let you know the source of your Personal Information. So long as a response is not impracticable or unreasonable, we will reply to you within a reasonable period without cost to you.

Use of and Access to Your Personal Information by Others

Generally, we will not make the Personal Information gathered using our products and services available to anyone outside Morningstar or its related companies—except as agreed or instructed by you or where required by or permitted by Law.

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.

If we use third-party service providers, these service providers may have access to your Personal Information to perform contractually specified services on our behalf. Generally Morningstar contractually requires that all Personal Information accessed by such providers be kept confidential and in accordance with the APPs.

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 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. For further information go to <http://www.aboutcookies.org/how-to-control-cookies/>

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 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).

If you do not want to receive direct marketing from us or our related companies or our advertisers/marketing partners, please contact us on 1800 03 44 55 or by email: help.au@morningstar.com.

Remarketing

We may also 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 1800 03 44 55 or by email: help.au@morningstar.com.

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.

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 authorized individuals have access to the information provided.

We restrict access to Personal Information and related 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 will take reasonable steps to 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. In most cases, we will give you access to any Personal Information that we hold about you within a reasonable period and in the manner you request, if that is reasonable. In some cases, we may refuse access where refusal is required or permitted by law. 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 may charge a reasonable fee for giving you access to your Personal Information, however at present we do not propose to make any 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 up-to-date, complete and accurate. If you want to update any Personal Information,

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you may do so by accessing the personal account information on our website or by contacting us:

Morningstar.com.au subscribers

Tel: 1800 03 44 55
Email: help.au@morningstar.com

Advisers/Institutions/Others

Tel: +61 2 9276 4446
Fax: +61 2 9276 4545
Email: helpdesk.au@morningstar.com

We will, on request, normally amend any of your Personal Information which is inaccurate, incomplete, out-of-date, irrelevant or misleading (without cost to you) 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 (at no cost to you and within a reasonable period), take reasonable steps to associate with the appropriate records of 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.

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 20 business days of receipt.

Morningstar Privacy Officer Contact Details

Privacy Officer

Morningstar Australasia Tel: +61 2 9276 4532
Level 36, Australia Square Fax: +61 2 9276 4545
264 George Street Email: auprivacy@morningstar.com
Sydney, NSW 2000, Australia

If your complaint is not resolved to your satisfaction you have the right to contact the Financial Ombudsman Service (FOS). FOS is an external dispute resolution scheme authorised to deal with complaints in relation to the financial services industry including privacy.

The Financial Ombudsman Service

GPO Box 3 Tel: 1800 367 287
Melbourne VIC 3001 Email: info@fos.org.au
Website: www.fos.org.au

If you are still not satisfied with the outcome you can contact:

Office of the Australian Information Commissioner

GPO Box 5218 Tel: 1300 363 992
Sydney NSW 2001 Email: enquiries@oaic.gov.au
Fax: +61 2 9284 9666

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, including the Morningstar.com.au website, you consent to the collection and use of any Personal Information and any related information in the manner described in this Privacy Policy.

Changes to the Privacy Policy

As the Federal Government introduces 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 our privacy 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.

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

More information on privacy legislation is available from the Office of the Australian Information Commissioner at www.oaic.gov.au