

# Morningstar Privacy Policy

## Morningstar Australasia

### Pty Limited

Level 36, Australia Square

264 George Street,

Sydney NSW 2000

ABN: 95 090 665 544

AFSL: 240 892

## Your Privacy is Important

Morningstar Australasia Pty Limited ABN: 95 090 665 544, AFSL: 240 892 ("Morningstar") recognises that maintaining the privacy of your Personal Information is important and is committed to protecting any Personal Information which it holds. Morningstar's main business activities are as an independent provider of investment information services and tools to individuals and businesses. This Privacy Policy describes the way Morningstar will manage and protect any Personal Information that it collects or that is provided to it in the course of its business activities. As of 21 December 2001, amendments to the Privacy Act require most private sector organisations to comply with the National Privacy Principles ("NPPs"). The NPPs regulate the way in which organisations may collect, use or disclose an individual's Personal Information. Morningstar is bound by and will comply with the NPPs in order to protect your privacy.

## Who Must Comply with this Policy

Morningstar, its employees, and contractors.

## Definitions

"Personal Information" means information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, from which the identity of an individual is apparent, or can reasonably be ascertained (for example, business contact details).

"Sensitive Information" means any information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, member of a trade union, sexual preferences or practices, criminal record or health information.

## Morningstar's Policy on Handling of Personal Information

### Collection of Personal Information

Morningstar will collect Personal Information in the course of providing its investment information services or tools to individuals or businesses. Morningstar collects Personal Information that is necessary for it to perform functions associated with its business activities, which are primarily the provision of general investment information services and tools to individuals and businesses.

Morningstar usually collects any contact details directly from you; for example, on forms that you complete, from face to face meetings, interviews, business cards, telephone conversations and other general direct contact that it has with you. However, Morningstar may also receive contact details from your employer who nominates you as a potential or existing customer or from its related companies (including related Morningstar international offices).

The information that Morningstar collects will usually include personal contact details such as your name, address and contact numbers (for example, information contained on business cards).

Morningstar may also collect and record any other information that you provide to it at the time of requesting subscription to our information sources.

Should Personal Information be obtained from a third party, we will take reasonable steps to ensure that you know:

- (a) the identity of the third party and how to contact them;
- (b) that you have the right to access the information;
- (c) the purposes for collecting the information;
- (d) whether the third party will disclose the information to other third parties;
- (e) the law that requires that information to be collected;
- (f) the consequences (if any) if that information is not provided.

## Use and Disclosure of Personal Information:

Morningstar understands the importance of protecting your privacy.

Any information that Morningstar collects about you will usually be used to provide you or a business with which you are associated with any of our investment information services or tools that have been requested or subscribed to. Morningstar may also use your Personal Information to provide you with information about other investment information services and tools or any other products or services that it or its related companies offer from time to time (direct marketing).

Morningstar will only use Personal Information about you for direct marketing in circumstances where:

- (a) it is impracticable for Morningstar to seek your consent before that particular use;
- (b) in each direct marketing communication with you, we draw to your attention that you may express a wish not to receive any further direct marketing communications;
- (c) you have not made a request to Morningstar not to receive direct marketing communications; and
- (d) each written direct marketing communication with you sets out Morningstar's address and telephone number and, if the communication with you is made by fax or other electronic means, a number or address at which Morningstar can be directly contacted electronically.

Morningstar may disclose your Personal Information to its related companies for that purpose. If you do not want Morningstar to use your information for these purposes contact our Privacy Officer on +61 2 9276 4506

In respect of all of the uses described above, Morningstar may disclose your Personal Information to organisations to whom it or its related companies outsource functions, such as mailing services, call centres or information technology services, but only so that those organisations can perform those functions.

Morningstar may use your personal information for other purposes if:

- (a) it has reason to suspect that unlawful activity has been, is being or may be engaged in, and use of the information is required to investigate the matter and report to the relevant person or authority; and
- (b) if determine it is necessary to lessen or prevent a serious or imminent threat to an individual's life, health or safety or due to serious threat to public health or safety.

Morningstar will only collect Sensitive Information with your consent or when it is required to by law.

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**Security and Quality of Personal Information:**

Morningstar will take all reasonable steps to ensure that any Personal Information which it holds is protected from misuse and loss and from unauthorised access, modification or disclosure and to ensure that any Personal Information which it holds is accurate, complete and up to date.

Morningstar appreciates any assistance you might give it to keep any Personal Information that it holds up to date, complete and accurate. Please feel free to contact Morningstar if your Personal Information changes in any way. Contact details for updating or correcting your Personal Information are set out at the end of this Privacy Policy.

**Access to Personal Information:**

In most cases, Morningstar will give you access to any Personal Information that it holds. Morningstar will handle all requests for access in accordance with the NPPs. In some cases, compliant with the National Privacy Principles, Morningstar may refuse to give you access to Personal Information it holds about you. If Morningstar refuses to give you access it will provide you with reasons for its refusal.

Morningstar will, upon request, amend your Personal Information which is inaccurate, incomplete or out of date. However, if Morningstar disagrees with your request, it will, upon your further request, take reasonable steps to associate with the appropriate record a statement that you claim the information is inaccurate, incomplete or out of date (whichever is relevant).

Morningstar may refuse you access to the information if providing you access:

- (a) poses a serious or imminent threat to the life or health of a person;
- (b) will unreasonably impact on the privacy of other persons;
- (c) is available through the process of discovery if legal proceedings have been commenced by you against us;
- (d) is unlawful;
- (e) is required or authorised by or under law;
- (f) will prejudice an investigation into unlawful activity;
- (g) may cause damage to Australia's security as determined by an enforcement body.

**Handling of Access Correction and Complaints:**

All requests for access, corrections, complaints or queries should be directed (or if attended to, then internally copied) to the Privacy Officer at Morningstar who can be contacted as follows:

Privacy Officer  
Morningstar  
Level 36, Australia Square  
264 George Street  
Sydney, NSW 2000, Australia  
Locked Bag 25, Royal Exchange,  
Sydney, NSW 1225 Australia  
Tel: +61 2 9276 4506  
Fax: +61 2 9276 4545

Additionally, if you wish to get more information about the way that Morningstar handles your Personal Information you should contact our Privacy Officer on the contact details set out above.

As the Federal Government introduces new privacy legislation, our privacy policies will be reviewed and updated accordingly.

More information on privacy legislation is available from the Federal Privacy Commissioner at [www.privacy.gov.au](http://www.privacy.gov.au)