

PRIVACY POLICY - MANNING ASSET MANAGEMENT

1. We respect your privacy

1.1 Manning Asset Management respects your right to privacy and is committed to safeguarding the privacy of our customers and website visitors. We adhere to the Australian Privacy Principles (APPs) established by the Privacy Act 1988 (Cth). This policy sets out how we collect and treat your personal information.

1.2 "Personal information" is any information we hold which is identifiable as being about you.

2. Collection of your personal information

2.1 Manning Asset Management collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website, when you provide us with completed forms, when you respond to surveys or promotions, when you like, follow and/or post to any of our social media pages, and when you communicate with our customer support.

2.2 In limited case we may collect or receive your personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

3. Use of your personal information

3.1 Manning Asset Management uses your personal information to provide our products and services to you. We may also use your personal information to make you aware of new and additional products, services and opportunities available to you.

3.2 From time to time Manning Asset Management may use your personal information to improve our products and services and better understand your needs.

3.3 Manning Asset Management may contact you by a variety of measures including telephone, email, sms and mail.

4. Disclosure of your personal information

4.1 We may disclose your personal information to any of our employees, officers, service providers, insurers, professional advisers, agents, suppliers or subcontractors insofar as is reasonably necessary for us to be able to provide our products and services to you.

4.2 We may from time to time need to disclose your personal information in order to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

4.3 We do not sell, rent or trade your personal information to or with third parties for the purpose of allowing them to send marketing material directly to you.

4.4 Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia.

4.5 If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer, to the extent permissible at law, our customer databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

- 4.6 By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will take reasonable steps to ensure that the recipient will handle your personal information in a manner consistent with the APPs.

5. Security of your personal information

- 5.1 Manning Asset Management is committed to ensuring that the personal information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure your personal information and protect it from misuse, interference, loss, and unauthorised access, modification or disclosure.
- 5.2 For this reason, we must be certain of your identity before we can discuss your account with you. If you contact us to discuss your account, you must be able to prove your identity. This ensures that we are able to protect your personal information by only giving it to you or someone who can prove that they are lawfully authorised to act on your behalf. If you have a general enquiry that does not involve discussing your personal information, you do not have to provide identification. In these situations, you will be able to deal with us without identifying yourself.
- 5.3 Your personal information is only retained for as long as necessary to fulfil the purpose/s for which it was collected, unless we are required to retain the information for a certain period of time under an Australian law or court or tribunal order. Once no longer required, we take such steps as are reasonable in the circumstances to destroy or permanently de-identify your personal information.
- 5.4 The transmission and exchange of information electronically is carried out at your own risk. Although we take measures to safeguard against the unauthorised disclosure of information transmitted electronically, we cannot guarantee the security of any information that you transmit to us, or receive from us, electronically.

6. Access to your personal information

- 6.1 You may request details of the personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at info@manningam.com.
- 6.2 We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances as set out in the Privacy Act 1988 (Cth).

7. Website

- 7.1 When you visit our website (www.ManningAM.com) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.
- 7.2 We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies, but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.
- 7.3 Our website may from time to time use cookies to analyse website traffic and help us provide a better website visitor experience. In addition, cookies may be used to serve relevant ads to website visitors through third party services such as Google Adwords. These ads may appear on this website or other websites you visit.

7.4 Our website may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Manning Asset Management is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

8. Social networking platforms

8.1 Whilst we may use social networking platforms, such as LinkedIn, for communications, we won't ask you to supply personal information publicly over these platforms.

8.2 Any personal information that you contribute to the publicly accessible sections of social media applications can be read, collected and used by other users of the application. We have little or no control over these other users and cannot guarantee that any information that you contribute to any social media applications will be handled in accordance with our privacy standards.

9. Complaints about privacy

9.1 If you have a complaint about our privacy practices, please provide written notice of your complaint via email to info@manningam.com or via mail to Level 4, 17-19 Bridge St, Sydney, NSW 2000, Australia. We take complaints very seriously and will respond within 14 days after receiving written notice of your complaint.

9.2 If you have a complaint regarding privacy that is not resolved by us to your satisfaction, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC) on 1300 363 992, at enquiries@oaic.gov.au or to GPO Box 5218 Sydney NSW 2001.

10. Changes to our policy

10.1 We may modify this Policy at any time, in our sole discretion, and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.

Version 3.0

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