

**Australian
Ethical**



Australian Ethical Group Privacy Policy

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1 Purpose and Scope

This Privacy Policy applies to Australian Ethical Investment Limited (ACN 003188 930) and its related bodies corporate, including (but not limited to) Australian Ethical Superannuation Pty Ltd (ACN 079 259 733), the Trustee of the Australian Ethical Retail Superannuation Fund (ABN 49 633 667 743, USI/SPIN AET0100AU) and the Australian Ethical Foundation Limited (ABN 14 607166 503) (together, 'we', 'us' or Australian Ethical').

It documents how we comply with the provisions of the *Privacy Act 1988* (Cth) (**Privacy Act**). The Privacy Act contains 13 *Australian Privacy Principles* (APPs) which regulates how we collect, use, disclose and keep your personal information secure.

We are committed to protecting your personal information. By visiting our website, using any of our services and online platforms, or otherwise providing us with your personal information you agree to your personal information being handled as set out in this Privacy Policy. You may request a copy of this Privacy Policy in a particular form and we will take such steps as are reasonable in the circumstances to give you a copy in such form.

2 What types of personal information do we collect and why?

2.1 Personal and sensitive information

Under the *Privacy Act*, personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

The personal information that we collect depends on the products or services that you apply for or enquire about. We may collect and hold a variety of personal information, including but not limited to the following:

- your name, gender/sex at birth, date of birth
- your contact details and residency/citizenship information; your voice recordings of phone interactions;
- financial details (e.g. bank account details, Tax File Number (TFN) and information about your other super fund(s);
- current and former employment details (e.g. salary, hours of work, employment dates);
- information to verify your identity (e.g. passport, driver's licence or birth or citizenship certificate);
- information about your spouse, dependants, and/or beneficiaries for death benefit claims;
- Information about your family commitments and social security eligibility and entitlements;
- Family Law information such as financial agreements or court orders;
- any other personal information that may be required in order to facilitate your dealings with us.

We may also collect "sensitive information" about you if it is reasonably necessary to provide you with a specific product or service and you expressly consent to our collection of that information. For example, when we process an insurance or death benefit claim, we need to collect health information which is considered to be sensitive information.

In addition, sensitive information may also include information about:

- your criminal record for Know Your Customer ID checks)
- your ethnic origin, political opinion, sexual orientation, membership of a professional association or religious beliefs

If you provide us sensitive information voluntarily you consent to us collecting that sensitive information.

Tax file numbers

Under the *Superannuation Industry (Supervision) Act 1993*, Australian Ethical Super is authorised to collect, use and disclose your tax file number (**TFN**). Australian Ethical Super may disclose your TFN to another superannuation provider or when your benefits are being transferred, unless you request in writing that your **TFN** not be disclosed to any other superannuation provider. Declining to quote your **TFN** is not an offence. However, giving your **TFN** to your superannuation fund will have the following advantages:

- we will be able to accept all permitted types of contributions to your account(s);
- other than the tax that may ordinarily apply, you will not pay more tax than you need to - this affects both contributions to your superannuation and benefit payments when you start drawing down your superannuation benefits; and/or
- it will make it much easier to find different superannuation accounts in your name so that you receive all your superannuation benefits when you retire.

We are also required to ask for your TFN when you invest in Australian Ethical Managed Funds. If you do not provide your TFN you may be subject to additional tax on your earnings in Australian Ethical Managed Funds.

Due to the sensitivity of TFNs and the legal restraints on their use and disclosure, if you lose or forget your **TFN**, we will not be able to provide it to you. You will have to ask the Australian Taxation Office (**ATO**) for a copy of it.

2.2 Collecting your personal information

We will usually collect personal or sensitive information directly from you when you communicate with us (online, email, post, phone calls, in person), such as when you:

- ask about, apply for our products or manage your account
- make a complaint or claim
- subscribe to any of our mailing lists;
- enter one of our competitions, promotions or giveaways or through a referral;
- register for, or attend, an Australian Ethical event or third party event arranged in conjunction with Australian Ethical (physically and/or virtually);
- apply for any employment opportunities with us; and
- participate in market research with us or our third party service providers (in doing this, we may combine information we hold about you from various service providers and public sources)

From time to time we may collect personal or sensitive information about you indirectly and/or from third parties, such as:

- your employers;
- your agent or financial adviser;
- your trustee/guardian, legal personal representative or someone who has a valid third party authority;
- your referees (employment);
- reports from professionals (e.g. medical professionals) or customer verification services
- the ATO, AFCA or other regulators;
- other superannuation and insurance entities;
- registries, brokers, platforms, clearing houses, gateway providers or similar entities;
- address-matching service providers
- service providers who conduct internet based surveys or run call centres;
- your spouse, family or friends (including where you're listed as their beneficiary for our products and services); and

- from publicly available sources.

2.3 Using your personal information

We collect, hold, use and disclose information to conduct our business which may include the following:

- providing our products and services, or the products and services of a third party, to you
- set up, manage and communicate with you in relation to establishing and administering your super, pension or managed fund account; to verify your identity and that of your beneficiaries or any agents acting on your behalf;
- administer and notify you about your shareholding;
- deal with enquiries, insurance claims (super) and complaints;
- comply with our legislative obligations, including customer identification and verification procedures required by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and other legislation;
- prevent, disrupt, and respond to scams;
- provide you with information about our business and our products and services;
- communicate with you about our Foundation community grants;;
- process competition and promotion entries;
- process employment applications;
- conduct product and market research, analysis and product development.

2.4 What happens if you don't provide the information requested?

If you choose not to provide the personal information that we ask for, or the information that you provide to us is incomplete or inaccurate, we may be unable to provide you with the products and services you have requested, or offer you the full range of benefits that may be available to you.

2.5 Marketing

By providing us with your personal information, you consent to us sending you marketing messages or ads about our products and services, whether you are a current, prospective or former member. These may come by mail, email, phone, text, app notifications or online. If you set a communication preference in the member portal, we will do our best to use that method. To help deliver these messages, we work with third-party service providers. If you don't want to receive marketing material from us or take part in research, you can use the unsubscribe function on electronic communications, in your member portal or contacting us on 1800 021 227. Please note that you cannot opt out of messages about how your account works or documents we're required to send by law.

3 Who do we disclose personal information to and why?

3.1 The organisations and people we disclose personal information to

We will only disclose your personal information for the purposes for which it was collected, where we are required or authorised by law to do so, where you have expressly consented to such disclosure or your consent may be reasonably inferred from the circumstances.

We may share your personal information with other entities both within and outside of Australian Ethical and they may include:

- Australian Ethical's subsidiaries and related body corporates, as necessary;
- your employer (or human resources/payroll provider) - to update or confirm the accuracy of our records and determining your superannuation benefits;
- doctors and other health professional -to update or confirm the accuracy of our records;
- your potential beneficiaries, legal personal representative or estate in relation to a distribution of your account(s) upon your death;
- your financial adviser or any other party authorised to act on your behalf;

- other entities as required by law, any courts or tribunals and/or any regulatory authorities including the ATO, the Australian Prudential Regulation Authority (APRA), the Australian Securities and Investments Commission (ASIC) and the Australian Transaction Reports and
- Analysis Centre (AUSTRAC); and
- our service providers, including:
 - administrators, custodians and registries and any of their sub-contractors to administer your account, including but not limited to superannuation clearing houses and gateway providers, mail houses, printing companies, archiving companies, IT service providers,
 - web hosting companies, web developers and identity and document verification service providers
 - insurers, auditors, actuaries, legal advisors
 - marketing and communication agencies, market research, media platforms, analytics and data services companies.

3.2 Disclosure of information overseas

We (and in some instances, our service providers) may hold personal information in servers located in Australia or cloud storage providers located overseas. Where your personal information is disclosed to service providers and other organisations, we seek to ensure that your personal information is handled in accordance with applicable privacy laws and the service provider has appropriate data security policies in place.

4 Storing and protecting your personal information

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure. We collect and store your personal information securely, making sure that we or any service provider have the appropriate IT data security policies in place. Paper-based files and records are held in secure premises.

The personal information you provide to us is only retained for as long as necessary to fulfil the purposes for which the information was collected and in accordance with our business data policies and legal obligations.

While we take reasonable precautions to secure your personal information, data protection measures are never completely secure and we cannot guarantee the security of your personal information. Our websites are linked to the internet and the internet is inherently insecure, so we cannot provide absolute assurance regarding the security of transmission of information you send to us online or via email.

If you do not wish to transmit information via our websites, social media channels or email there are other ways in which you can provide us with your information, such as by mail or telephone.

5 Online

Links to other websites

Our website may contain links to third parties' websites. Those other websites are not subject to this Privacy Policy and procedures. Once you leave our website, the guidelines of this Privacy Policy no longer apply. You will need to review those websites directly to view a copy of their privacy policies and to ensure your personal information is protected.

Cookies and web beacons

Australian Ethical and our third-party partners, such as our advertising and analytics providers, use various technologies to collect information, such as cookies and web beacons. We use cookies, web beacons and other technologies to improve and customise our portals, mobile apps and websites and your experience; to understand usage of our

services and the interests of our customers; to determine whether an email has been opened and acted upon; and to present you with advertising relevant to your interests.

Cookies are small files stored on your device that allow us to:

- Understand how our digital platforms are used
- Tailor content and communications to your interests
- Support marketing and advertising

Some cookies are temporary and will disappear when you close your browser. Others are persistent and will stay on your computer for some time. You can manage your cookie preferences through your browser settings. Please note that disabling cookies may affect how our website and app function.

Third party tools

We use trusted third-party tools, such as Microsoft Clarity and Google Analytics, to help us understand usage patterns and improve our services. These tools may collect information like your IP address, browser type, and pages visited. We may share hashed identifiers (such as hashed email addresses) with third-party platforms including Google Marketing Platform to enable targeted advertising, audience matching, and analytics. These identifiers are processed in accordance with applicable privacy laws and are not used to directly identify individuals.

We also use Google reCAPTCHA on our website for security purposes and to try to prevent fraudulent activities. It works by collecting hardware and software information, such as device and application data, and sending this data to Google for analysis. This may include user activity on our website (e.g., mouse movements, clicks, and keystrokes). This service is provided by Google LLC ("Google"). By using our website, you agree to the use of Google reCAPTCHA and acknowledge that its operation is governed by Google's Privacy Policy and Terms of Service.

Social media platforms

While we may use social media platforms to advertise our products and to respond to general queries, we will never request that you disclose personal information publicly through these channels.

Please be aware that any personal information you choose to post in publicly accessible areas of social media platforms may be viewed, collected, and used by other users. We do not have control over these users and cannot ensure that any information you share on such platforms will be managed in accordance with our privacy standards. These external social network services handle your personal information for its own purposes and they have their own privacy policies which you can find on their websites.

6 Accessing and correcting your personal information

We will take all reasonable steps to ensure any personal data we collect, use or disclose is up to date and accurate. If you believe personal information that we hold about you is not up to date or accurate, you may ask us to correct it however you will need to provide certified proof of your identity before your information is corrected.

You can also update your personal information via our secure member and investor online facilities.

You may ask us to provide you with details of the personal information we hold about you, and copies of that information. We will respond to your request and attempt to provide you with the data within 30 days of receipt of your request.

If we provide you with copies of the information you have requested, to the extent permitted by law, we may charge you a reasonable fee to cover the administrative costs of providing you with that information.

Please direct all request for access and correction to privacy@australianethical.com.au

7 What do you need to do if you have a privacy complaint?

If you have any queries you can contact our Privacy Officer:

1800 021 227

privacy@australianethical.com.au

GPO Box 8, GPO Box Centre, Sydney NSW 2000

If you wish to make a complaint, it should be in writing (letter or email) and please include sufficient detail regarding your complaint together with any supporting evidence. We'll contact you if we need more information, and once we've finished looking into it, we'll let you know the outcome in writing and invite your feedback.

If you're not happy with our response, we'll take another look. If you're still not satisfied, you can lodge a complaint online with the Office of the Australian Information Commissioner on their website oaic.gov.au

1300 363 992

02 6123 5145

enquiries@oaic.gov.au

GPO Box 5288 Sydney NSW 2001

8 Changes to this Privacy Policy

We may update this Privacy Policy occasionally without notice if the changes aren't significant. Please check it from time to time to stay informed about how we handle your personal information. The date of the latest update is shown the start of the Privacy Policy.