



**AIMS Funds Management**  
A Member of AIMS Financial Group

# PRIVACY POLICY

January 2016

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## 1. OVERVIEW

Privacy of our clients is important to us. This policy describes the way that AIMS Funds Management (AIMS) collects, holds and discloses information about individuals with whom AIMS deals with. As an organisation that deals with personal information, AIMS is subject to the Privacy Act (1988) (Cth) (the Privacy Act), including the National Privacy Principles (NPPs). We may vary this policy from time to time.

The AIMS Funds Management (AIMS) consists of AIMS Fund Management Limited, AIMS Real Estate Funds Limited and AIMS Investment Managers Limited.

## 2. WHAT SORT OF INFORMATION WE COLLECT AND HOW

AIMS will only collect personal information that is necessary to maintain a business relationship with our clients. This may include such things as name, address, contact details, tax file number and date of birth. If the client does not provide this personal information AIMS may not be able to provide them with the product or service they requested.

How AIMS collects personal information will depend upon how the client interacts with AIMS and any applicable law (eg *Anti-Money Laundering and Counter-Terrorism Financing Act (Cth) 2006*). AIMS may collect it through application forms and telephone contact but will not source any information from third parties.

The provisions of the Privacy Act restrict the collection of sensitive personal information. AIMS will not generally collect sensitive information unless required by law. AIMS will not collect personal information by unlawful or unfair means.

## 3. HOW WE USE CLIENT INFORMATION

When AIMS collects personal information, AIMS will inform the client of the purposes for which it is collected. Primarily, this will be to provide them with the product or service they have requested and the administration of that product.

AIMS may also use personal information to:

- inform them about other products, however, they can notify AIMS at the time of the application or any time thereafter if they do not wish to receive any promotional material or information;
- carry out business that includes performing administration and operations including: accounting, record keeping, archiving, system development and testing;
- develop new products;
- assist clients in their queries; and
- fulfill our legal requirements or obligations.

Where appropriate, and having regard to the purpose for which the information is being used, AIMS will take reasonable steps to ensure that personal information provided is complete, accurate and up to date before use.

The information will not be used for any other purpose than it was obtained for unless consent has been obtained from the individual to use it for another purpose, or, if it is required by law.

#### **4. DISCLOSURE OF PERSONAL INFORMATION**

AIMS will not disclose a client's personal information unless:

- AIMS is obliged to do so by law;
- AIMS has their express consent; or
- AIMS must disclose their personal information to organisations that perform specific essential services for us, for example mailing. AIMS limits this disclosure to the information they need to perform the service.

#### **5. QUALITY OF INFORMATION**

AIMS maintains personal information by taking reasonable steps to make sure that the personal information collected, used and disclosed is accurate, relevant and up to date and that the collection of the information does not intrude to an unreasonable extent upon the affairs of the individual concerned.

AIMS asks clients to provide immediate notification when they change their contact details such as telephone number and address or if they feel the information that is held on record is inaccurate.

#### **6. SECURITY OF YOUR PERSONAL INFORMATION**

AIMS will use all reasonable steps and up to date techniques and processes, which meet current industry standards to protect personal information from misuse, loss and unauthorised access, modification and disclosure.

AIMS will take reasonable steps to destroy personal information in a secure manner if it is no longer required and there are no legal obligations to retain the information.

#### **7. GOVERNMENT IDENTIFIERS**

AIMS does not use Tax File Numbers or any other government identifier for the purposes of identifying clients with our products or services unless required by law to do so. For example, AIMS may be required by law to disclose a Tax File Number to the Australian Tax Office.

#### **8. ACCESS TO INFORMATION**

A client can access most of the personal information that is held about them and request corrections.

This right is subject to some exceptions. For example, a client may not be able to obtain access to personal information which:

- would reveal personal information about another person; or
- AIMS are prevented by law from disclosing

A client can request access to their personal information by submitting a letter or by contacting AIMS by telephone.

## **9. WHAT IF WE HAVE MADE A MISTAKE**

If a client believes that that has been a breach of the policies outlined in this document, they can raise the matter in writing to:

Privacy Officer  
AIMS Funds Management Group  
Level 41, 259 George Street  
Sydney, NSW 2000

The Privacy Officer will ensure that any issues are promptly resolved.