



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

# PRIVACY POLICY

October 2023

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## 1. OVERVIEW

Privacy of our clients is important to us. This policy describes the way that AIMS Financial Group (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 Australian Privacy Principles (APPs) and the Privacy Legislation Amendment (Enforcement and Other Measures) Act 2022. We may vary this policy from time to time.

This policy applies to all Australian entities of AIMS Financial Group located in Australia.

## 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 (e.g. *Anti-Money Laundering and Counter-Terrorism Financing Act (Cth) 2006*, United Nations Security Council sanctions regime under the *Charter of the United Nations Act 1945*, *Autonomous Sanctions Act 2011*, and *Autonomous Sanctions Regulations 2011*). 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.

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.

#### **5. DIRECT MARKETING AND OVERSEAS DISCLOSURE**

AIMS may use and disclose the clients' personal information for direct marketing purpose to inform them of services or products that may be of interest to them. The communication methods include telephone, emails or SMS.

If receiving direct marketing communications is not expected, the clients can choose to opt out by contacting our Privacy Officer. AIMS will deal with such requests within a reasonable period and free of charge.

With regard to overseas disclosure, AIMS may send the clients' personal information to related bodies in Singapore. Whenever disclosing such information overseas, AIMS will take measures to make sure the information is disclosed in accordance with the standards that sets out in APPs, except in the cases where the clients' consent has been obtained.

In some circumstances, clients' information may be disclosed to AIMS' service providers that perform a range of services on behalf of AIMS, such as fund administrators, custodians, brokers, auditors, solicitors, insurance providers, information technology vendors, and other consultants. Some of these service providers may be based overseas including but not limited to Singapore, New Zealand, China, United Kingdom, Cayman Islands, British Virgin Islands, Ireland, the Netherlands, United States of America, India, Philippines and Vietnam.

## **6. 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.

## **7. 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, and interference.

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,

## **8. ACCESS AND CORRECTION**

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 or correction of their personal information by submitting a letter or by contacting AIMS by telephone. Such request will be responded by AIMS within a reasonable period. In the case of a request refusal, AIMS will provide written notices for its decision and explain the reasons.

In addition, AIMS will comply with any requests from the Office of the Australian Information Commissioner to provide information or documents and answer questions in relation to investigations and enforcement of breaches of the Privacy Act.

## **9. REVIEW OF POLICY**

AIMS will at least annually review this Policy to ensure it is updated to any regulatory changes. If there were any renewals, an updated version will be posted on AIMS website at <http://www.aimsfunfs.com.au>

## 10. PRIVACY COMPLAINTS

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:

Augustine Goh & Dominic Wan  
Privacy Officers  
AIMS Funds Management Group  
Level 41, 259 George Street  
Sydney, NSW 2000  
augustine.goh@aims.com.au and dominic.wan@aims.com.au

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

If you are not satisfied with our solution, you can lodge a complaint with the Office of the Australian Information Commission at:

<https://www.oaic.gov.au/privacy/privacy-complaints/>