

# PRIVACY NOTICE

ClearBridge Investments Limited ("CIL") manages this website and is committed to protecting your privacy and handling your personal information in accordance with the *Privacy Act 1988* (Cth) and the Australian Privacy Principles ("APPs") as well as its applicable Privacy Policies.

## Who This Notice Applies To

This website is intended for use by **wholesale clients and financial intermediaries only**. If you are a retail investor, please do not submit personal information via this website. Any inquiries received from retail clients will be referred to Franklin Templeton Australia Limited ("FTAL") for appropriate handling and promptly deleted by CIL.

## What Information We Collect

When you submit an inquiry to CIL, we may collect the following personal information:

- Your name
- Name of your organisation or representative
- Email address and associated information
- Telephone number
- Business office or other address as supplied
- Other personal information, as supplied

This information is collected solely for the purpose of responding to your inquiry and managing our business relationship with you.

We may also collect personal information from other people (e.g. a third-party custodian) or independent sources, however, we will only do so where it is not reasonable and practical to collect the information from you directly.

Sometimes we may be provided with your personal information without having sought it through our normal means of collection. We refer to this as "unsolicited information". Where we collect unsolicited information, we will only hold, use and/or disclose that information if we could otherwise do so had we collected it by normal means. If that unsolicited information could not have been collected by normal means, then we will destroy, permanently delete or de-identify the information as appropriate.

## How We Use Your Information

We use your personal information to:

- Respond to your inquiries
- Communicate with you about our services
- Maintain records of correspondence
- Comply with legal and regulatory obligations

We do not use your personal information for direct marketing unless you have expressly consented.

We may also need to collect personal information in order to comply with our legal obligations, such as the AML/CTF laws, under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

It may be necessary for ClearBridge to disclose your personal information to certain third parties in order to assist us with one or more of our functions or activities. This may include organisations providing administration or custodial services for ClearBridge managed products.

*Please be aware that there is certain information that we are required by law to provide you and you cannot opt out of receiving this information.*

## **Storage and Security of Personal Information**

CIL stores personal information in secure formats, including encrypted databases, restricted-access hard copy files, and authorised personal devices such as company-issued laptops. We recognise the importance of safeguarding personal information, particularly in the context of our relationships with wholesale clients and intermediaries, and take reasonable steps to protect it from misuse, loss, unauthorised access, modification, or disclosure.

Our security measures include:

- Role-based access controls to internal systems, ensuring that only authorised personnel can access sensitive information.
- Mandatory confidentiality protocols, including password protection and secure authentication procedures.
- Secure storage of physical records, with access limited to staff whose roles require it.
- Physical security controls at our premises to prevent unauthorised entry.
- Network and cybersecurity protocols designed to protect data across our systems and infrastructure.
- Internal policies governing email, internet usage, and document handling to ensure responsible data management.
- Due diligence and contractual safeguards with third-party service providers (e.g., cloud storage, identity verification) to ensure compliance with the Australian Privacy Principles or equivalent standards.

Personal information that is no longer required for business or legal purposes is securely destroyed or de-identified in accordance with our data retention policies. Where full deletion of personal information is not technically possible—for example, data stored on legacy systems or past Microsoft servers located outside CIL's custody or control—we take reasonable steps to limit access to such data to the extent practicable and possible, and ensure that it is not used or disclosed inappropriately.

Our website contains links to third-party websites. We do not share personal information with these external sites and are not responsible for their privacy practices. We encourage users to review the privacy policies of any linked websites.

## **Disclosure of Information**

Your personal information may be disclosed to:

- Internal staff responsible for managing wholesale client relationships
- Affiliates and their employees on a 'need-to-know' basis and in accordance with APPs
- Third-party service providers who assist us in operating our website or managing communications, under strict confidentiality obligations
- A regulatory authority under authorised compulsory notice powers

By submitting an inquiry to CIL, you are deemed to have consented to the use of all personal information you have supplied.

## **Cookies and Tracking Technologies**

CIL uses cookies and similar technologies, including some provided by third parties, to enhance user experience, as well as to measure and aggregate data about site usage and browsing patterns. These technologies help us secure, analyse and tailor the site for all users and better understand how this Website is used. Some portions of this Website may require the use of cookies for full functionality. You may adjust your

browser settings at any time to refuse cookies or alert you when cookies are being sent, however disabling cookies may impact your experience with certain site features and functionality.

## **Access and Correction**

You may request access to or correction of your personal information by contacting us at [auinvestorservices@clearbridge.com](mailto:auinvestorservices@clearbridge.com). We will respond promptly and in accordance with our legal obligations.

## **Security**

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure.

## **Privacy Complaints**

CIL is committed to addressing any concerns about how we handle personal information for wholesale investors and intermediaries. If you believe we have breached our privacy obligations under this Privacy Notice or the *Privacy Act 1988* (Cth), you may lodge a complaint as follows:

### 1. Contact our Privacy Officer

- Email: [aucompliance@clearbridge.com](mailto:aucompliance@clearbridge.com)
- Phone: 02 9397 7300
- Mail: Privacy Officer c/- ClearBridge Investments Limited, Level 13, 35 Clarence Street, Sydney NSW 2000.

### 2. Provide Complaint Details

Please include your name, contact information, a description of the issue, relevant dates and any supporting documentation.

### 3. Acknowledgment and Investigation

- We will acknowledge receipt of your complaint within 5 business days.
- We aim to investigate and respond in writing within 30 calendar days.

### 4. Response and Resolution

Our written response will outline our findings, any action we propose to take and the reasons for our decision.

### 5. External Escalation

If you remain dissatisfied after receiving our final response, you may refer your complaint to the Office of the Australian Information Commissioner at <https://www.oaic.gov.au> or by calling 1300 363 992.

This complaints process is available only to wholesale clients and intermediaries. We will treat your complaint confidentially and take all reasonable steps to resolve it promptly.