



RBC Investor & Treasury Services Australia Privacy Policy Statement

About RBC Investor & Treasury Services

RBC Investor & Treasury Services is a leading specialist provider of asset servicing, custody, payments and treasury services for financial and other institutional investors worldwide. We serve clients from 19 locations across North America, Europe, Asia and Australia. We deliver custodial, advisory, financing and other services to safeguard clients' assets, maximize liquidity and manage risk in multiple jurisdictions.

Introduction

The RBC Investor & Treasury Services Australia Privacy Policy Statement addresses applicable privacy risk management requirements under the Australian Privacy Principles (APP) as set out in the *Privacy Act 1988 Commonwealth*. It serves as an addendum to the RBC Privacy Risk Management Policy applicable to all business, operational and functional units of Royal Bank of Canada and RBC Investor Services Trust in Australia collectively referred to as "RBC I&TS Australia" (RBC I&TS).

At RBC I&TS we are dedicated to protecting client privacy and safeguarding the personal, business and financial information entrusted to us. We are pleased to provide you with information on the rigorous privacy protocols followed by RBC I&TS. If you have any questions, please contact RBC I&TS' local compliance/privacy officer. Contact details are available on page 5.

A) Anonymity & pseudonymity

When individuals make general queries to RBC I&TS they have the option of not identifying themselves, or of using a pseudonym. Where possible, RBC I&TS will answer your questions should you choose to be anonymous or use a pseudonym, however we may be restricted by law or where impracticable in terms of contracted services. Where RBC I&TS is required to collect personal information from an individual in order to provide a service, where relevant, reasonable and practicable to do so, RBC I&TS will provide individuals with the option of not having to identify themselves when dealing with RBC I&TS except where:

- RBC I&TS is required or authorised by or under an Australian law, or a court/tribunal order, to deal with individuals who have identified themselves; or
- it is impracticable for RBC I&TS to deal with individuals who have not identified themselves or who have used a pseudonym.

B) Collection of personal information

RBC I&TS will collect personal information only by lawful and fair means and where possible, only from the individual, unless RBC I&TS acts as an agent and / or is required or authorised by, or under an Australian law, or a court/tribunal order, to collect the information from someone other than the individual or it is unreasonable or impracticable to do so.

RBC I&TS will not collect personal information unless the information is reasonably necessary for one or more of RBC I&TS' functions or activities. Please refer to section C for information on purpose of use. The type of personal information RBC I&TS collects includes information to develop our strong client relationships and Know Your Client (KYC) and Anti-Money Laundering (AML) information related to KYC obligations. Information collected may include but is not limited to:

- Names
- Addresses (including email addresses)
- Telephone and facsimile numbers
- Date of birth
- Occupation
- Gender
- Education
- Details about next of kin including spouse and children's names Credit worthiness
- Criminal record
- Source of funds

RBC I&TS stores and holds this information in accordance with its policies and practices related to information security and document retention. Where RBC I&TS acts as an agent, it will not collect personal information unless the information is reasonably necessary for, or directly related to, one or more of its functions or activities.

Sensitive information

Sensitive information is information or an opinion about an **individual's**:

- (a) racial or ethnic origin; or
- (b) political opinions; or
- (c) **membership** of a political association; or
- (d) religious beliefs or affiliations; or
- (e) philosophical beliefs; or
- (f) **membership** of a professional or trade association; or
- (g) **membership** of a trade union; or
- (h) sexual preferences or practices; or
- (i) criminal **record**;
 - (i) that is also **personal information**; or
 - (ii) **health information** about an **individual**; or
 - (iii) genetic information about an **individual** that is not otherwise **health information**.

RBC I&TS will not collect sensitive information about an individual unless the individual consents to the collection of the information and:

- (i) the collection of the information is reasonably necessary for, or directly related to, one or more of RBC I&TS' functions or activities; or
- (ii) the collection of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- (iii) a permitted general situation exists in relation to the collection of the information by RBC I&TS.

Permitted general situations include the following:

- (i) lessening or preventing a serious threat to the life, health or safety of any individual, or to public health or safety
- (ii) taking appropriate action in relation to suspected unlawful activity or serious misconduct

- (iii) locating a person reported as missing
- (iv) asserting a legal or equitable claim
- (v) conducting an alternative dispute resolution process

C) Purposes for which RBC I&TS uses personal information

The purposes for which RBC I&TS uses information may include any of the following:

- AML;
- KYC;
- compliance with any law or regulation from any applicable government body or authority; investigating and/or reporting of any criminal offences, where required by law;
- disclosure to lawyers, auditors, financial advisors and other professionals in connection with their services to us;
- disclosure to related companies within the RBC Group or its affiliates, including directors, employees, agents and representatives thereof, for operational, management, administrative, supervisory or evaluative purposes;
- to open and administer client accounts;
- to provide contracted services to its clients.

Where RBC I&TS receives personal information which RBC I&TS has not requested, RBC I&TS will, within a reasonable period after receiving the information, determine whether or not it could have collected the information upon request and determine whether the personal information should be destroyed or permanently de-identified.

D) Notification of collection

RBC I&TS will take such steps (if any) as are reasonable in the circumstances to notify the individual of the collection of the personal information including the contact details of RBC I&TS.

E) Direct marketing

RBC I&TS may use or disclose personal information (other than sensitive information) about an individual for the purpose of direct marketing if the following conditions are met: -

- (a) RBC I&TS collected the information from the individual; and
- (b) the individual would reasonably expect RBC I&TS to use or disclose the information for that purpose; and
- (c) RBC I&TS provides a simple means by which the individual may easily request not to receive direct marketing communications from the organisation; and
- (d) the individual has not made such a request.

If RBC I&TS uses or discloses personal information about an individual:

- (a) for the purpose of direct marketing by RBC I&TS; or
- (b) for the purpose of facilitating direct marketing by other organisations;

the individual may:

- (c) if paragraph (a) applies — request not to receive direct marketing communications from RBC I&TS; and
- (d) if paragraph (b) applies — request any other organisation not to use or disclose the information for the purpose referred to in that paragraph; and
- (e) request RBC I&TS provide its source of the information.

If an individual makes such a request, RBC I&TS will not charge the individual for the making of, or to give effect to, the request and:

If the request is of the kind referred to, RBC I&TS will give effect to the request within a reasonable period after the request is made; and

If the request is of a kind referred to in paragraph (e), RBC I&TS will, within a reasonable period after the request is made, notify the individual of its source unless it is impracticable or unreasonable to do so.

F) Quality of personal information

RBC I&TS will take such steps (if any) as are reasonable in the circumstances to ensure that the personal information RBC I&TS collects, uses or discloses is, having regard to the purpose of the use or disclosure, accurate, up-to-date, complete and relevant.

G) Security of personal information

RBC I&TS will take such steps as are reasonable to protect information from misuse, interference, loss, unauthorised access, modification or disclosure.

Where RBC I&TS no longer needs the information and is not required to retain the information, RBC I&TS will take such steps as are reasonable to destroy or de-identify the information. RBC I&TS will not keep personal information for longer than is necessary and will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed.

H) Adoption, use or disclosure of government related identifiers

RBC I&TS will not adopt a government related identifier (for instance a Tax File Number, 'TFN') of an individual as its own identifier.

I) Access and correction

RBC I&TS will respond to requests for access to the personal information within a reasonable period [30 days] after the request is made and give access to the information in the manner requested by the individual, if it is reasonable and practicable to do so. RBC I&TS will not charge the individual for making the request or for giving access to the personal information.

If RBC I&TS holds personal information about an individual and is satisfied that, having regard to a purpose for which the information is held, the information is inaccurate, out of date, incomplete, irrelevant or misleading or the individual requests correction the information, RBC I&TS will take such steps (if any) as are reasonable to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up to date, complete, relevant and not misleading.

Such modifications will be made in terms of contractual commitments and may be enacted via the contracting party. If RBC I&TS corrects personal information about an individual that RBC I&TS has previously disclosed and the individual requests RBC I&TS to notify the other APP entity of the correction, RBC I&TS must take such steps (if any) as are reasonable in the circumstances to give that notification unless it is impracticable or unlawful to do so.

Refusal to correct information

If RBC I&TS refuses to correct the personal information as requested by the individual, RBC I&TS will give the individual a written notice that sets out:

- (a) the reasons for the refusal except to the extent that it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other matter prescribed by the regulations.

J) Cross border data flows

RBC I&TS business activities and operation may mean that from time to time personal information related to individuals may be disclosed to entities, organisations and related bodies corporate outside of Australia including to Canada, Malaysia, Luxembourg, Hong Kong, the United Kingdom and any jurisdictions in which RBC has offices.

Before RBC I&TS discloses personal information to an overseas recipient, RBC I&TS will take reasonable steps to ensure that the overseas recipient will comply with and does not breach the APPs in relation to the information, except where RBC I&TS reasonably believes that the recipient of the information is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APPs protect the information and there are mechanisms that the individual can access to take action to enforce that protection of the law.

K) Resolving Your Privacy Issues

Your privacy and security is important to us. Please contact us if you have any questions about our privacy policies and procedures. If you believe your confidential information has been stolen or obtained for fraud or you have received a suspicious email, please direct your query to:

<http://www.rbc.com/privacysecurity/int/contact-us.html>

For general enquiries or for further information about RBC I&TS Privacy Policy, please contact:

Local Compliance/Privacy Officer
RBC I&TS, Level 46, 2 Park Street, Sydney

RBC Investor & Treasury Services™ is a global brand name and is part of Royal Bank of Canada. RBC Investor & Treasury Services is a specialist provider of asset servicing, custody, payments and treasury services for financial and other institutional investors worldwide. RBC Investor Services™ operates through two primary operating companies, RBC Investor Services Trust and RBC Investor Services Bank S.A., and their branches and affiliates.

In the UK, RBC Investor Services Trust operates through a branch authorized by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The Dubai Branch of RBC Investor Services Trust is regulated by the Dubai Financial Services Authority.

In Australia, RBC Investor Services Trust is authorized to carry on financial services business by the Australian Securities and Investments Commission under the AFSL (Australian Financial Services Licence) number 295018.

In Singapore, RBC Investor Services Trust Singapore Limited (RISTS) is licensed by the Monetary Authority of Singapore (MAS) as a Licensed Trust Company under the Trust Companies Act and was approved by the MAS to act as a trustee of collective investment schemes authorized under S 286 of the Securities and Futures Act (SFA). RISTS is also a Capital Markets Services Licence Holder issued by the MAS under the SFA in connection with its activities of acting as a custodian.

In Hong Kong, RBC Investor Services Bank S.A. is a restricted license bank and is authorized to carry on certain banking business in Hong Kong by the Hong Kong Monetary Authority. RBC Investor Services Trust Hong Kong Limited is regulated by the Mandatory Provident Fund Schemes Authority as an approved trustee.

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