

Privacy Policy

April 2024

Allan Gray Australia Privacy Policy

A reference to 'we' and/or 'us' is a reference to Allan Gray Australia Pty Ltd (Allan Gray) and its related bodies corporate and associates (such as the Orbis Group and Allan Gray South Africa). A reference to 'you' or 'your' is a reference to any person who views this privacy policy and website, and any person from whom Allan Gray has collected or collects personal information. A reference to Allan Gray Products means any funds or products available for investment (including through our website) or an investment mandate.

Our Privacy Policy

We understand that privacy is important. So our privacy policy explains how we will handle your personal information according to the Privacy Act 1988 (Cth) and the Australian Privacy Principles, as applicable.

By accessing or using this website, or by otherwise providing Allan Gray with personal information, you acknowledge that you have read and understood this privacy policy and consent to the collection and use of your personal information according to the terms below and as may be indicated on the document through which you provide such information to us.

This privacy policy may change from time to time, without notice.

What personal information do we collect?

Personal information means any information that can identify you. We obtain personal information in order to provide you with our services or manage our relationship with you. This includes details such as your name, address, contact information, birth date, and nationality.

We may sometimes need to collect personal information from individuals who are not our customers/clients, for example, business contact details of a company representative or authorised signatories who we normally deal with.

Where possible, we will collect personal information from you directly. There may, however, be circumstances where we may receive and collect your personal information from third parties.

Generally, we will not collect sensitive information about you (e.g. your ethnic background, political belief, religion or health) unless such information is required for providing our services to you and with your explicit consent, or where required by law.

How is personal information collected and stored?

In most cases, we will collect personal information about you:

- when you register to receive information from us
- when you register for online access to open an account and transact on it
- from the documents you complete in relation to Allan Gray funds to invest in, or redeem from
- through link tracking – our emails contain hyperlinks, each of which has a unique tag. When you click on one of these links the click will be logged, and you will be redirected to the relevant page on our website. This helps us to understand who has clicked through from an email to visit our webpage and we may use this to tailor future messages to you or

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- when you provide instructions to our Client Services team or otherwise contact us. In particular, we may collect personal information to verify your identity over the phone. Calls to our Client Services line may be recorded or monitored for quality control, training, regulatory or other compliance reasons.

When you visit our website or interact with our emails, we collect information about you using 'cookies'. Cookies are pieces of information that a site sends to your computer's hard disk when you first visit a site or page or when you open an email. Website cookies help recognise your device the next time you visit our website. We also use email cookies in some of our emails to help us understand how you interact with our emails and to improve our future email communications. We use the term 'cookies' in this policy to refer to all files that collect information in these ways. Cookies do not identify individual users, however our servers may record information about your usage, the time of your visit, its duration, the pages you visit and style settings. By accessing our website and subscribing to our emails, you consent to the storage of cookies on your device and you agree that this cookie policy will apply whenever you access our website or interact with our emails on any device. You can withdraw your consent at any time. We may use this information and other related site information to measure your interest in the contents provided and as such to continuously respond to your needs and improve our service. We reserve the right to update this cookie policy from time to time. Any changes will be posted within this page and shall become effective as soon as they are posted. Continued use of the website and subscription to our emails constitutes your agreement to all such updates.

The cookies used on our website are based on the following categories:

1. Strictly necessary cookies – essential for our site to function and to allow you to access secure areas of the website.
2. Performance cookies – used to collect information about how visitors use our website; for instance, which pages visitors go to most often, and if they get error messages from web pages. They may also be used to measure your browsing activity, so we can understand how you use our website.
3. Functionality cookies – allow the website to remember choices you make (such as your geographical region and your investor type) and provide appropriate content as a result in order to help us comply with our legal obligations.
4. Targeting cookies – used to deliver adverts more relevant to you and your interests. They are also used to limit the number of times you see an advertisement as well as help measure the effectiveness of advertising campaigns.

When you access your account information online through our website, you will be re-directed to an online portal provided by a member of the SS&C Group (SS&C). SS&C has its own privacy policy. You should familiarise yourself with this policy.

Security of your personal information is important, so in storing such information we take all reasonable steps to protect it from loss or unauthorised access, destruction, use, modification or disclosure.

How is personal information used?

We only use your personal information for the purposes for which it was collected, such as to assist you from a client or relationship management perspective, facilitate the processing of your application, transaction or other requests and to communicate with you on an ongoing basis about your investment. Once personal information is no longer required to be retained, it is either destroyed or permanently de-identified. With your consent, we may also send you educational and marketing material about our other products and services which may be of interest to you. Please note that if you are a New Zealand retail client, due to New Zealand law we are unable to send you these materials, therefore we will not provide you with this information even if you consent to the receipt of such materials. You can contact us at any time to ask us not to send this information to you.

In providing financial products and services, we may need to disclose your information to persons carrying out functions on behalf of Allan Gray or in respect of the Allan Gray funds and services.

This includes:

- members within the Orbis Group or Allan Gray South Africa, some of which are located offshore in Bermuda, Canada, Hong Kong, Luxembourg, South Africa, United Kingdom and the United States. Personal information shared within the Orbis Group or with Allan Gray South Africa will be strictly used for the purposes for which it was collected and will be maintained in accordance with the [Orbis Group's Privacy Policy](#) or the [Allan Gray Limited \(South Africa\) Privacy Statement](#) instead of the Australian Privacy Principles
- our sister entity in Australia, Orbis Investment Advisory Pty Limited (Orbis Australia), who has engaged us to distribute certain Orbis funds to the retail advice industry in Australia. If you are a financial adviser or intermediary, your personal information will be shared with Orbis Investment Advisory Pty Limited Australia for relationship management and account servicing purposes. This information will be dealt with in accordance with [Orbis Australia's Privacy Policy](#)
- Heathcote Investment Partners Limited (Heathcote) located in New Zealand, who we have engaged to assist us with adviser distribution activities in New Zealand. If you are a New Zealand adviser that has provided your contact details alongside contact consent, your contact details will be passed along to Heathcote. Your contact information will be dealt with in accordance with Heathcote's privacy policy instead of the Australian Privacy Principles and
- third parties that perform processing, servicing functions, assist with client relationship management or otherwise support the Allan Gray business, such as the Allan Gray funds' unit registrar, the responsible entity of the Allan Gray funds, mailing houses, information technology and data storage providers, identity verification services, external consultants and auditors. Some of these third parties may be located offshore or store data overseas, and therefore will be subject to privacy and data protection laws that may differ from those of Australia. Where we have engaged a service provider, we will take reasonable steps to ensure that:
 - the service provider keeps your personal information confidential and
 - the information is used only to the extent required to perform the services requested by us.

From time to time, Allan Gray or its third-party providers may store your information in cloud or other types of networked systems. Information stored in cloud or network-based systems can be accessed from and transferred between, various countries over the internet, and as such, it is not always practicable to know in which country your information may be held. By providing your personal information to us, you acknowledge that countries in which your information may be held will have privacy and data protection laws that may differ from those of Australia and overseas organisations may be required to disclose information that Allan Gray has shared with them, under foreign laws.

Can personal information be given to anyone else?

We do not sell, rent or trade personal information to, or with, third parties. In some exceptional circumstances personal information may be disclosed without obtaining your consent or prior notification to you. This includes where disclosure is required by law enforcement agencies, government agencies, courts or according to applicable laws.

Your access to your personal information

You can access most of the personal information we hold and request changes. However, this right is subject to certain exceptions. For example, you may be unable to obtain access to your personal information which would reveal personal information about another person, or we may be prevented by law from disclosing such information.

Please contact our Client Services team if you:

- have any questions about this privacy policy
- wish to access or correct your personal information that we hold or
- would like to make a complaint about the way in which we have handled your personal information.

Should you require any assistance
please contact us:

Australia 1300 604 604
International +61 2 8224 8604
clientservices@allangray.com.au
allangray.com.au