

MFS Privacy Notice – MFS International Australia Pty Ltd

Protecting your personal information is important to us.

MFS International Australia Pty Ltd (“we, us and our”) and its affiliates within the MFS Investment Management group of companies (“MFS”) are committed to protecting your privacy.

We are bound by obligations in the Privacy Act 1988 (Commonwealth) (“Privacy Act”), which governs how entities handle personal information.

This Privacy Notice explains how we collect, store, use and protect your personal information. It also outlines the measures we take to safeguard your Personal Information and how you can contact us about our privacy practices. For purposes of this Notice, Personal Information means information about an identifiable natural person. It includes information you have provided to us or was collected by us from other source.

Important note

If you own MFS products or receive MFS services in the name of a third party such as a bank or broker/dealer, their privacy notice may apply to you instead of ours. In addition, for certain MFS funds, information provided by you or your financial intermediary to the funds’ non-affiliated third-party service providers (e.g., the funds’ transfer agent) would be subject to the privacy policies of the service provider.

If applicable, as disclosed in the product disclosure statements of certain MFS funds, investors in such funds should be aware that personal information may be disclosed by the funds’ transfer agent: (i) to MFS or any of its affiliates or agents and to other third party service providers of the funds, which may be based in countries where privacy laws do not exist or provide less protection than the laws where you reside; or (ii) when required by applicable law or regulation. By investing in such a fund, each investor appoints MFS or any of its affiliates or agents as attorney-in-fact to request and collect from the funds’ transfer agent all necessary investor information.

Privacy relating to the operations of the MFS Australian Trusts should be directed to us and the responsible entity Equity Trustees Limited. If the investment in the MFS Australian Trusts is through an investor directed portfolio service (“IDPS”) operator, any privacy matters should be directed to Equity Trustees Limited (www.eqt.com.au) or the relevant IDPS operator.

1. Links to Third Party Websites

The MFS website may contain links to other third-party websites that are not affiliated with or maintained by MFS. MFS does not monitor the privacy practices of these third-party websites, does not exercise any authority over the websites and specifically, does not control the use of “cookies” on third party websites. As a result, MFS does not assume any responsibility for the content or data-collection policies and procedures of these websites. When you access any of these third-party websites, MFS cannot guarantee that your privacy will be protected in the same way it is on the MFS website.

2. Accountability

We have strict policies and procedures governing how we deal with your Personal Information. Each and every one of our employees is responsible for respecting and protecting the Personal Information to which the employee has access.

Our compliance team oversees privacy governance including policy, dispute resolution, education, communications activities, and internal reporting on privacy matters. If you have any questions or concerns regarding our Privacy Notice, please [Contact Us](#).

3. What personal information do we collect?

In the course of our business activities, we collect and hold personal information about you. We will only collect personal information that is necessary to provide our services to you.

Examples of the types of personal information we may collect include:

- name, date of birth, gender and contact details (such as the entity with which you are affiliated, phone number, email and street address) including details about you from a resource such as LinkedIn, your company's website, or a business intelligence resource;
- identification documentation to verify identity and to ensure compliance with the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Commonwealth) and/or other legislation and regulations regarding identification verification, and tax reporting and withholding;
- employment-related details in the context of recruitment (such as employment history and reference checks);
- details of transactions or holdings in MFS-managed financial products that you have made or initiated;
- our correspondence if you contact us;
- device information such as information about your operating system, browser, software applications, IP address, geolocation, security status and other device information in order to improve your experience, protect against fraud, and manage risk;
- completed survey information that we use for research purposes;
- details of your marketing preferences (e.g. communication preferences) and information relevant to selecting appropriate products and services to offer you;
- email tracking information through a single, campaign-unique "web beacon pixel" to tell us whether our emails are opened and combined with other technology to verify any clicks through to links within the email. We may use this information for purposes including determining which of our emails are more interesting to you and to query whether users who do not open our emails wish to continue receiving them. The pixel will be deleted when you delete the email. If you do not wish the pixel to be downloaded to your device, you should select to receive emails from us in plain text rather than HTML, choose not to click links that we send you or unsubscribe from the receipt of our emails; and
- bank account details to enable payment of distributions or redemptions.

We do not actively seek to collect sensitive information (for example ethnic origin or information about any criminal record), unless it is necessary for our business purposes and we have your consent. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with the Privacy Act.

The information that you provide to us is voluntary, however, if you do not provide the personal information requested, we may not be able to provide our services or products to you.

4. How do we collect and store your personal information?

The way we collect your personal information depends on the way you engage with us, for example:

- by telephone;
- via email;
- through your use of our website;
- through the completion of an application or registration form; or
- when you meet our representatives face to face.

Where reasonable and practicable, we will collect your personal information directly from you.

We may also collect information about you from third parties, such as:

- our service providers;
- your employer;
- our clients, where we are providing services to them; or
- references in the case of prospective employees.

Our Cookies Policy – collecting information from visits to our website.

We collect certain aggregate and non-personal information when you visit our website. It tells us such things as how many users visited our website and the pages accessed. By collecting this information, we learn how to best tailor our website to our visitors. We collect this information through "cookie" technology, as explained below.

Like many companies, we use "cookies" on our website. Cookies are bits of text that are placed on your computer's hard drive when you visit certain websites. Cookies may enhance your online experience by saving your preferences while you are visiting a particular website.

When you visit our website, cookies are placed on your computer. We use cookies to tell us, for example, whether you've visited us before or if you're a new visitor, and to help us identify website features and content in which you may have the greatest interest, as well as the "remember login" setting. We collect this information to enhance your experience on our website.

You are not obliged to accept cookies from our website. The "help" portion of the toolbar on most browsers will tell you how to stop accepting new cookies, how to be notified when you receive a new cookie, and how to disable existing cookies. For more information about including how to set your internal browser to reject cookies please go to www.allaboutcookies.org. Remember, though, without cookies, you will not be able to take full advantage of all of our website features.

Please see [MFS Cookies Policy](#) for more information, including how to opt-out or change your cookie preferences.

5. How do we use your personal information?

We will generally only use your personal information for the purpose for which it was collected, which may include the following:

- to establish, assess and manage your investment or relationship with us;
- for communication purposes, such as to handle any enquiry or complaint you raise against us;
- to provide market commentary or marketing information about products and services that may be of interest;
- to conduct analysis about our products and services to enhance our service offerings;
- to comply with any relevant laws or regulations, which includes but is not limited to obligations under the Corporations Act 2001 (Commonwealth), Income Tax Assessment Act 2006 (Commonwealth), Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Commonwealth), and the Privacy Act;
- to defend or prosecute claims as applicable which may include disclosing your Personal Information to third parties, the court service and/or regulators or law enforcement agencies in connection with enquiries, proceedings, or investigations by such parties anywhere in the world;
- to prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- to consider job applicants for employment or for employee related matters; and
- for any purpose required or authorised under law (including purposes for which you have provided consent).

Personal information collected about you may be used by different companies within the MFS group, but only if this is necessary in order for us to provide you with our products or services.

6. How is personal information disclosed to others?

It is our general policy to maintain the confidentiality of your personal information and to disclose such information to a third party only when:

- there is a legitimate business purpose for doing so, including to service providers that perform services on our behalf or to prevent fraud and unauthorized transactions;
- we are legally required to do so, for example, to regulatory authorities or law enforcement authorities; and
- we have received consent to the disclosure.

We won't sell your personal information to third parties, and we take measures to ensure that personal information is not disclosed to unauthorized third parties.

We may disclose your personal information to entities located overseas for one or more of the purposes set out above (including to other entities within the MFS group such as in Hong Kong, Singapore, the United Kingdom and the United States). We take steps to ensure that the overseas recipients of your personal information do not breach the privacy obligations relating to your personal information. We won't transfer your personal information to any recipient outside of Australia unless we believe that the recipient will adequately protect your personal information.

Please [Contact Us](#) if you would like more information on the protection given to your information when it is transferred outside of Australia.

7. Will your personal information be kept accurate, complete, up to date and secure?

We aim to ensure your personal information is kept accurate, complete, up to date and relevant. Please contact our Privacy Officer using the contact information below if you would like to correct any information about you that you may believe is inaccurate, incomplete or out of date.

If we do not agree that the personal information is inaccurate, incomplete or out-of-date, we will notify you in writing of our reasons to refuse any corrections and how to make a complaint.

We maintain physical, electronic, and procedural safeguards to help protect the personal information we collect about you. We have agreements and controls in place with third party service providers requiring that any information we provide to them must be safeguarded and used only for the purpose of providing the service we have requested the company to perform.

Security over the internet

No data transmission over the Internet or website can be guaranteed to be secure from intrusion. However, we maintain commercially reasonable physical, electronic, and procedural safeguards to protect your personal information in accordance with data protection legislative requirements.

All information you provide to us is stored on our or our subcontractors' secure servers and accessed and used subject to our security policies and standards. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our websites, you are responsible for keeping this password confidential and for complying with any other security procedures that we notify you of. We ask you not to share a password with anyone.

8. How can you access or correct your personal information?

If you require access to, or wish to update your personal information, please contact our Privacy Officer using the contact information below.

We will need to verify your identity before giving you access or correcting your information.

In certain circumstances, we may not be able to correct or provide you with access to your information. If so, we will provide you in writing with the reasons why.

9. How can you complain if you have concerns about a breach of your privacy?

We treat any complaints about our handling of personal information seriously.

If you have a complaint related to a breach of your privacy, please contact our Privacy Officer using the contact information below. Please provide us details of your concerns in writing so that we can investigate the issues you have raised. We will make every effort to resolve your concerns as soon as practicable.

If you don't receive a response about your complaint within 30 days or you are dissatisfied with the response, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner ("OAIC") to have the complaint heard and determined.

10. Who can you contact about your privacy?

If you have any questions or concerns about the privacy of your personal information or this Privacy Notice, please contact us via the following:

Attention: The Privacy Officer, MFS International Australia Pty Ltd
Mail: Level 15, 20 Martin Place, Sydney NSW 2000
Phone: (02) 9228 0400
Email: PrivacyOfficerAustralia@mfs.com

Changes to this Privacy Notice

We may change or update sections of this Privacy Notice at any time. Please check back from time to time so you are aware of any changes or updates.

Effective Date: December 2024

Classification: Public