

## MORRISON GLOBAL PRIVACY POLICY

This Morrison Global Privacy Policy explains how H.R.L. Morrison & Co Group Limited Partnership and all its related entities (**Morrison, we, us or our**) processes personal information from the following types of data subjects: (i) visitors to our websites; (ii) client and investor contacts, advisers and market participants; and (iii) certain specified client or investor staff or officers, as required by the know-your customer obligations in the anti-money laundering and countering financing of terrorism laws and regulations; (iv) individuals who apply for a job with us; and (v) other individuals that contact us and/or share information with us, including by telephone, in writing or by visiting our premises. For clarity, the Morrison Director & Employee Privacy Policy (and not this Policy) applies to Morrison's processing of personal information about Morrison employees, contractors, consultants, directors, and equity holders.

This Privacy Policy applies to all Morrison entities in all locations, including New Zealand, Australia, Singapore, the United Kingdom, Switzerland, and the United States (referred to collectively as Morrison or the **Group**); where necessary, additional country-specific notices may be included as schedules. It explains what information we collect, why we need it, how we will use it, and who we might share it with. It also explains how we protect personal information and what rights you have in relation to your information.

We may amend this Privacy Policy from time to time, including to reflect changes in the law or our information handling practices and the way we operate our business. This Privacy Policy was last updated in March 2024.

### 1 THE MORRISON GROUP ENTITY YOU DEAL WITH IS THE CONTROLLER

The entity responsible for your personal information (the **controller**) will be the member of the Morrison group that originally collects information from or about you. For example, if you are located in New Zealand, then the controller will be Morrison New Zealand Limited of 5 Market Lane, Te Aro, Wellington; if you are located in the United Kingdom, then the controller will be Morrison Infrastructure (UK) Limited; and so on. You can find out more about our Group by contacting us using the information in the contact us section.

Our Privacy Officer (Data Protection Officer) is based in our New Zealand office. You can contact the Privacy Officer by emailing [compliance@morrisonglobal.com](mailto:compliance@morrisonglobal.com).

### 2 OUR LEGAL BASES FOR PROCESSING YOUR INFORMATION

The legal bases on which we process personal information differ depending on the circumstances:

- **Performance of a contract** – some processing is necessary for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract. This includes delivering the services you have requested.
- **Legal obligation** – some processing is necessary for compliance with legal obligations that we are subject to. These include know-your-customer checks to prevent money laundering and fraudulent activities.
- **Legitimate interests** – some processing is necessary to meet our legitimate interests, including managing risk and improving our products and services.
- **Consent** – in certain jurisdictions and/or in exceptional circumstances, we may rely on your consent to process personal information where this is required by law, including (depending on the jurisdiction) to collect information about you from third parties.

These legal bases are explained in more detail in section 6.

### 3 WHAT PERSONAL INFORMATION WE COLLECT

We will only collect personal information from or about you in a lawful manner and where the information is reasonably necessary for one or more of our functions or activities. We will not collect any sensitive personal information (also referred to as "special categories of personal data") about you. We will usually collect personal information about you directly from you. However, in limited circumstances, and (where required by law) with your consent, we may collect personal information about you from other sources, including:

- any third party authorised by you to provide information to us;
- your employer or a company of which you are an officer;
- publicly available sources of information, including public databases or the Internet;
- third party service providers and agents; and
- affiliates in our Group that hold information about you.

We may collect the following personal information about you:

- your personal identifiers, such as name, address, age, contact details and date of birth;
- information relating to your profession, including job title, employer, and work contact details;

- information collected on your movements in and around our premises (via CCTV footage);
- information that is required or authorised by law that applies to us or our operations including, but not limited to: if you are in New Zealand, the Anti-Money Laundering and Countering Financing of Terrorism Act 2009, and if you are in Australia, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);
- your opinions about our products, services and/or staff;
- personal information included in any enquiries you make using any online or offline means to contact us; and
- information about your use of our websites, including information generated by cookies (see section 4 for more information about this), from the referral page, the date and time of your access, the type of web browser you are using, your IP-address, your non-precise/non-specific geographic location, and your operating system.

We may also assign you a unique identifier, which we may reference in our communications with you, if that is necessary to enable us to carry out our functions efficiently, and where we have taken all reasonable steps to ensure your identity is clearly established.

Our services, our premises and our websites are not intended for those 18 years old or younger without express parental permission. We do not knowingly collect the personal information of anyone under the age of 18.

If you provide us with any third party's personal information (e.g. personal information regarding your clients, employees, or family members), you represent that, by sending such personal information to us for the relevant purposes, you have obtained the relevant third party's consent for such provision.

## 4 HOW WE USE COOKIES

We use cookies to collect anonymous data and improve your experience on our websites. Cookies are small pieces of information which are sent to a website visitor's browser and stored on their computer's hard drive. You can find out more about the way we use cookies by reading our Cookies Policy.

## 5 CONSEQUENCES OF NOT PROVIDING INFORMATION

In most cases, the provision of your personal information is not mandatory. However, in some circumstances – such as where we are required by law to collect certain information – if you do not provide us with some or all of the information that we ask for (or if the personal information you provide to us is not complete, accurate, true and/or correct), we may not be able to provide certain services to you or a client with whom you are associated.

## 6 OUR PURPOSES FOR PROCESSING YOUR INFORMATION

The purposes for which we process personal information may include:

- delivering the services clients request from us, including administering service contracts, communicating with you about contracts or services, and responding to queries (*legal basis – performance of a contract*);
- marketing and relationship development, including communicating with you about other services or topics we think you or your employer may be interested in, and inviting you to events (*legal basis – legitimate interests*);
- providing financial services to wholesale clients, including:
  - o advising in relation to securities, interests in managed investment schemes (excluding investor directed portfolio services), basic deposit products and deposit products other than basic deposit products, derivatives and foreign exchange contracts (*legal basis – performance of a contract*);
  - o dealing in financial products by arranging for another person to issue, apply for, acquire, vary or dispose of securities, interests in managed investment schemes (excluding investor directed portfolio services), basic deposit products and deposit products other than basic deposit products, derivatives and foreign exchange contracts (*legal basis – performance of a contract*); and
  - o providing custodial or depository services other than investor directed portfolio services (*legal basis – performance of a contract*);
- managing the security and control of information and communication systems, including our websites and our offices (*legal basis – legitimate interests*);
- managing access to, and the security of, our premises (*legal basis – legitimate interests*);
- health and safety risks in relation to our employees and those attending our premises (*legal basis – legitimate interests*);
- complying with our obligations to detect, investigate, report and seek to prevent fraud and anti-money laundering in accordance with applicable anti-money laundering and counter-terrorism financing laws and regulations (*legal basis – legal obligation*);
- preventing fraud and identity theft, and keeping our clients and employees safe (*legal basis – legitimate interests*);
- improving our products and services, including our websites (*legal basis – legitimate interests*);
- carrying out any activity in connection with legal proceedings, crime or fraud prevention, detection

- or prosecution or any insurance claim (*legal basis – legitimate interests*); and
- complying with regulatory and legal obligations (*legal basis – legal obligation*).

## 7 WHEN WE DISCLOSE YOUR INFORMATION

We do not sell, trade, or rent personal information to others. However, we may need to disclose your personal information to third parties in order to meet the purposes outlined in section 6, including to:

- other entities within our Group, where necessary to provide services to our clients, to manage our contractual relationships or to manage our business;
- contractors and third-party service providers, who will process the information on our behalf for one of the purposes outlined in section 6;
- professional advisors, including accountants, auditors, lawyers, insurance advisors and advisors in connection with the administration, processing and servicing of client transactions;
- our insurers;
- other persons where required or provided for by applicable laws;
- government agencies, law enforcement agencies or regulators as authorised or required by applicable law, and to comply with requests of law enforcement, regulatory and other governmental agencies including tax institutions;
- anyone authorised by you to receive, use or access your personal information; and
- a potential or actual third-party purchaser of our business or assets, if in the future we sell or transfer some or all of our business or assets.

## 8 HOW WE STORE AND PROTECT YOUR INFORMATION

We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected, to comply with any applicable legal requirements, or if we reasonably believe there is a prospect of litigation relating to your personal information or dealings. Usually, this will be the duration of the services plus 7 years, depending on the type of personal information in question. After information has been determined to no longer be required, personal information is either destroyed or de-identified.

We store personal information in both electronic and hard copy formats. We ensure that personal information is safe by implementing physical, electronic and procedural safeguards (including up-to-date security software), to prevent unauthorised access, use, modification, disclosure or other misuse. We take all reasonable steps to ensure that

our contractors and third-party service providers protect personal information in the same way and at least to the same standard as we do, including by imposing contractual obligations to implement measures to maintain the security, confidentiality, and integrity of personal information.

## 9 WHEN WE TRANSFER PERSONAL INFORMATION OUTSIDE A JURISDICTION

As Morrison is a global business, we may transfer your information to, or access your information from, any country where our Group has an office (as set out at [www.hrlmorrison.com](http://www.hrlmorrison.com)) or otherwise conducts business, including New Zealand, Australia, the United Kingdom, Hong Kong, Switzerland, the United States, and the Asia-Pacific region. We may also use third-party service providers that store or process your information in another country.

We will take appropriate steps to ensure that transfers of personal information are in accordance with applicable laws and carefully managed to protect your privacy rights and interests. These steps will include limiting transfers to countries which are recognised as providing an adequate or comparable level of privacy protection to your country of residence or, if this is not possible, ensuring that transfers are subject to contractual privacy and security obligations that meet the requirements of your country of residence.

You can ask us for more information about the third countries to which your data is transferred and the safeguards we have put in place by contacting our Privacy Officer (Data Protection Officer) at [compliance@hrlmorrison.com](mailto:compliance@hrlmorrison.com). However, please note that we may not be required to share details of safeguards in some circumstances, including where this would affect our commercial position, or create a security risk.

## 10 YOUR PRIVACY RIGHTS

Depending on the laws in your state of residence, you may have certain privacy rights which are granted to you by data protection laws, including the right to know what information we hold about you and the right to correct it. In some jurisdictions, you may also be able to ask us to erase your information or stop using it in a particular way or to exercise any of the additional rights described below. If you have questions about which rights apply, or to exercise any of these rights, please email our Privacy Officer (Data Protection Officer) at [compliance@hrlmorrison.com](mailto:compliance@hrlmorrison.com).

Please note, before processing your rights request, we may ask you for additional information to confirm your identity. We will not usually charge you for exercising your privacy rights, though we may impose a reasonable charge if we believe that a request is manifestly unfounded or excessive and if we are permitted by law to do so.

Further information about the rights you may be able to exercise is set out below.

- **Right to access**

You can ask us to confirm whether or not we are processing your personal information and, if we are, you can ask us for a copy of your information. If we need to refuse all or part of your request, we will tell you why.

- **Right to correct**

You can ask us to correct personal information about you that you think is wrong. If we do not agree, you can ask us to attach a statement of correction to the information.

- **Right to erase**

You may have the right to request that we erase your personal information if:

- o it is no longer needed for the purposes for which it was collected; or
- o you have withdrawn your consent for the processing of the information (where the processing was based on consent); or
- o we have accepted your objection to processing, and we have no other lawful basis to retain it; or
- o it has been processed unlawfully; or
- o necessary to comply with a legal obligation to which we are subject.

- **Right to restrict processing or sharing of your personal data**

You may have the right to opt out of certain processing or sharing of your personal information with third parties, including if:

- o the applicable law permits you to opt out of such processing or sharing; or
- o the accuracy of the personal information is contested, to allow us to verify its accuracy; or
- o the processing is unlawful, but you do not want it to be erased; or
- o it is no longer needed for the purposes for which it was collected, but you still need it to establish, exercise or defend legal claims; or
- o you have objected to processing, and we are still considering that objection.

- **Right to object**

Where we are processing your personal information based on our legitimate interests, including where this involves automated decision-making, you may have the right to object to this.

- **Right to withdraw consent**

If you have given us your consent for the processing of your personal information, you generally have the right to withdraw your consent at any time. Note that this will not affect the lawfulness of any processing of your personal information that we have carried out based on the consent before its withdrawal.

## 11 MAKING A COMPLAINT ABOUT PRIVACY

If you have any concerns or questions about the way we have processed your personal information, please email our Privacy Officer (Data Protection Officer) at [compliance@morrisonglobal.com](mailto:compliance@morrisonglobal.com).

We will try our best to resolve your concerns in accordance with our internal complaints resolution process. However, if you are not satisfied with the outcome of your complaint, or if you do not wish to make a complaint to us, you have the right to make a complaint to your local data protection authority:

### AUSTRALIA

Office of the Australian Information Commissioner – <https://www.oaic.gov.au/privacy/privacy-complaints/lodge-a-privacy-complaint-with-us>

### NEW ZEALAND

Office of the Privacy Commissioner – <https://www.privacy.org.nz/your-rights/making-a-complaint-to-the-privacy-commissioner/>

### UNITED KINGDOM

Information Commissioner's Office – <https://ico.org.uk/make-a-complaint/>

### LUXEMBOURG

Commission Nationale pour la Protection des Données (CNPD) - <https://cnpd.public.lu/en/particuliers/faire-valoir/formulaire-plainte.html>

### SINGAPORE

Personal Data Protection Commission - <https://www.pdpc.gov.sg/complaints-and-reviews/report-a-personal-data-protection-concern/personal-data-protection-complaint>

### SWITZERLAND

Federal Data Protection and Information Commissioner – <https://www.edoeb.admin.ch/edoeb/de/home/der-edoeb/kontakt/kontaktformular.html>

### UNITED STATES OF AMERICA

Federal Communications Commission – <https://consumercomplaints.fcc.gov/hc/en-us/articles/8824334151572-Privacy-Complaints>