

PRIVACY POLICY – New Zealand

Introduction

J.P. Morgan Asset Management recognises the importance of the personal information we hold about individuals and the trust they place in us.

By explaining our Privacy Policy to you, we hope that you will better understand how we keep personal information private and secure while using it to provide services and products.

This Privacy Policy applies to the New Zealand relationships of the J.P. Morgan Asset Management group unless specifically stated otherwise. For these purposes the J.P. Morgan Asset Management group includes J.P. Morgan Asset Management (Australia) Limited and any of its affiliates, subsidiaries, shareholders or such shareholders' subsidiaries, as applicable, and shall include any successors including, without limitation, an assignee or successor or any affiliate or subsidiary of such entity or any person who, under the laws of the jurisdiction of incorporation or domicile, has assumed the rights and obligations of any J.P. Morgan Asset Management entity or any of its affiliates, subsidiaries, shareholders or such shareholders' subsidiaries or to which under such laws the same have been transferred. In this Policy, the members of this group are individually and collectively referred to as "J.P. Morgan Asset Management", "we" or "us".

We are committed to safeguarding your personal information in accordance with the requirements of the Information Privacy Principles of the Privacy Act 2020.

In general, we will not use or disclose such information collected about you otherwise than for the purposes set out in this Policy, for a purpose you would reasonably expect, a purpose required or permitted by law, or a purpose otherwise disclosed to, or authorised by you.

We may, in connection with particular services we offer or provide to you, make other privacy disclosures to you or seek your authority to use your personal information in ways which are different from or more specific than those stated in this Privacy Policy. In the event of any inconsistency between the provisions of this Privacy Policy and those additional materials, the provisions of the additional materials will prevail.

What is Personal Information?

"Personal information" for the purposes of this Policy is to be read in accordance with the Privacy Act, which includes information about an identifiable individual.

Collection of personal information

J.P. Morgan Asset Management will collect personal information that it believes is necessary for us to deliver our services or products or otherwise for our primary business functions and/or activities.

Ordinarily we will only collect information about you when you provide it to us or it is provided to us with your authority.

J.P. Morgan Asset Management will only collect personal information by lawful and fair means and not in an unreasonably intrusive way. The types of personal information we collect generally include your name, address, date of birth, gender, nationality, residence status, telephone number, e-mail address, financial information, IRD number, employment history, education history, information contained in any identity document, such as a passport number and drivers licence number, and information necessary to make or receive payments to or from you or necessary to otherwise maintain an asset management relationship with you.

We will collect personal information directly from you when we establish a relationship with you, update your personal information or another person's personal information held by us, deal with us as a key contact or employee of an institutional client or non-client relationship such as vendors, deal with us over the telephone or in person, send us a letter. On occasions, we may need to collect personal information about you from third parties.

Our collection of such personal information under this Privacy Policy is authorised under the New Zealand Privacy Act 2020 and is mandatory for us to provide you with our asset management services. If you fail to provide such personal information to us, we may be unable to provide you with our services (or any part thereof).

Personal information about third parties

If at any time you provide us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, that we will use and disclose that personal information and that they may gain access to it should we hold that information.

Purposes of collecting personal information

Personal Information may be collected for the purpose of undertaking J.P. Morgan Asset Management's obligations and providing services and products or for any of the following purposes:

- managing client relationships and/or servicing you globally;
- carrying out or facilitating the client's instructions or responding to the client's queries or requests;
- all existing or future customer due diligence, client verification procedures and ongoing account administration (including but not limited to monitoring, screening and sanctions risks assessment);
- daily operation of the accounts, services, products and/or other services and facilities provided to or to be provided to the client;
- performing our administrative operations, including accounting, record keeping, archiving, systems development and testing and staff training;
- performing control and risk management functions – including conducting audits generally, and anti-money laundering regulatory screening, reporting and monitoring;
- enhancing operational, technology, finance, compliance and other support function efficiencies;
- handling complaints and managing legal matters and litigation;
- managing our rights and obligations in relation to external payments systems;
- conducting market or customer satisfaction research;
- inviting you to other events that may interest you;
- developing and identifying products and services that may interest you;
- unless you ask us not to, telling you about other products and services we offer;
- assessing and processing employment applications and conducting due diligence as part of pre-employment screening;
- when considered necessary by J.P. Morgan Asset Management to comply with any law, regulation, court order or requirement of a regulatory or self-regulatory body, tax authority or industry bodies; and
- any other purpose relating to or in connection with the business or dealings of J.P. Morgan Asset Management.

Disclosure of personal information

J.P. Morgan Asset Management is a global financial organisation that operates in and provides services and products to clients through, and with the support from, its affiliates and subsidiaries located in multiple jurisdictions. As a global organisation, J.P. Morgan Asset Management may centralise (within one or more of its affiliated companies or unaffiliated service providers) certain activities relating to client accounts and relevant services and products.

You authorise J.P. Morgan Asset Management to disclose necessary information to related companies, affiliates, and any agents or contractors who provide services to us in connection with the provision of products or services you have sought from us. These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them.

In some cases, we may need to disclose your personal information to related companies, affiliates, agents or contractors located outside New Zealand. If we believe that the overseas third party is not subject to, or has not agreed to comply with, privacy obligations equivalent to those which apply to us, we will seek your consent to transfer the information, except where the Privacy Act 2020 does not require us to do so.

Subject to what is permitted by law, the types of parties we may disclose your personal information to include:

- employees, agents, subcontractors, insurers consultants, exchanges, repositories, depositories, clearing houses, affiliated or unaffiliated providers of outsourced or other services in connection with provision of services or products or otherwise in connection with the operation of J.P. Morgan Asset Management business;
- professional advisers of J.P. Morgan Asset Management;
- any financial institution or financial intermediary with which the client has or proposes to have dealings or otherwise is in connection with provision of services or products;
- governmental, regulatory, supervisory, law enforcement or similar authority (including tax authority) or industry body in any jurisdiction;
- trade repositories or similar facilities or institutions (and related third party service providers), whether pursuant to legislation, regulation, supervisory directive or otherwise;
- any court of competent jurisdiction in defence of claims or enforcement of rights;
- auditors of J.P. Morgan Asset Management or auditors of the client;
- an assignee or a proposed assignee of any of J.P. Morgan's rights or obligations;
- any person or organisation who introduces you to us;
- any person with whom J.P. Morgan Asset Management may enter a transaction under which payments may be made by reference to an agreement with the client;
- debt collection agencies; and
- any person to the extent necessary, in our view, in order to carry out the instructions you give us.

Personal information collected by any member of the J.P. Morgan Asset Management entities may be disclosed and shared between other members of the JPMorgan Group (including those members that are located overseas) and may (unless you tell us not to) be used for the respective marketing purposes of the members of the J.P. Morgan Asset Management Group. For these purposes the JPMorgan group includes JPMorgan Chase Bank, N.A. (NZBN 9429033103686) and J.P. Morgan Securities Australia Limited (NZBN 9429031404679) (with its business address at Level 13, ASB Tower 2, Hunter Street, Wellington 6011, New Zealand) and any of its branches, affiliates, subsidiaries, shareholders or such shareholders' subsidiaries, as applicable, and shall include any successors including, without limitation, an assignee or successor or any affiliate or subsidiary of such entity or any person who, under the laws of the jurisdiction of incorporation or domicile, has assumed the rights and obligations of JPMorgan Chase Bank, National Association, or any of its branches, affiliates, subsidiaries, shareholders or such shareholders' subsidiaries or to which under such laws the same have been transferred.

Access to your personal information

If at any time you wish to know what personal information we are holding about you or request access to or correct such personal information, you are welcome to ask us in a form or manner which identifies the nature of the personal information requested.

Requests can be made to your J.P. Morgan Asset Management business contact or the Privacy Officer for of J.P. Morgan Asset Management as follows:

Email address: privacy.officer.au@jpmorgan.com

Under certain circumstances, we may not be able to agree to your access request. This includes, but is not limited to, where:

- it would involve the unwarranted disclosure of the affairs of another individual;
- information is subject to legal professional privilege;
- giving you the information would disclose a trade secret or would be likely unreasonably to prejudice the commercial position of the person who supplied or who is the subject of the information; or
- we are prevented by law from disclosing the information, or providing access would prejudice certain investigations.

We may charge a fee for accessing your personal information.

We will take reasonable steps to ensure that your personal information is accurate, complete, up to date, relevant and not misleading.

If at any time, you find that current personal information we hold about you is inaccurate, incomplete, out-of-date, irrelevant or misleading, please contact your Adviser, Relationship Manager or the Privacy Officer and we will correct our records as required.

Security of your personal information

J.P. Morgan Asset Management will take reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification or disclosure. In line with our internal authorisation and access policies, employees only have access to information on a need to know basis.

To the extent permitted by law, J.P. Morgan Asset Management will take reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose for which the information may be used and disclosed under this Policy except in circumstances where J.P. Morgan Asset Management is required or authorised to retain such Personal Information (including as a result of the operation of tax, financial services or other applicable law).

Direct marketing

We may use your personal details, including your address, to provide you with newsletters and information about products, services or other events that may be of interest to you.

If at any time you do not wish to receive such marketing information, you have the option to ask us not to send you any further such material and you may do so by writing to your Adviser, Relationship Manager or the Privacy Officer.

Complaints

If you wish to make a complaint about our collection, use or disclosure of your Personal Information, you should contact your J.P. Morgan Asset Management contact or our Privacy Officer (using the contact details above) in writing. We will make every effort to resolve your complaint internally.

If we do not resolve your complaint to your satisfaction you may be able to apply to the Privacy Commissioner to have your complaint investigated. For more information about how you may lodge a complaint with the Privacy Commissioner, please contact the Commissioner on 0800 803 909 or visit the website on www.privacy.org.nz.

Changes to this Privacy Policy

Please note that this Privacy Policy may change from time to time. You may at any time request a current copy from your J.P. Morgan Asset Management contact or access it from the website (<https://am.jpmorgan.com/global/privacy>). We encourage you to review our Privacy Policy periodically for any changes.

Need more information?

If you have a query concerning how your personal information is collected and used or in relation to J.P. Morgan Asset Managements' Privacy Policy, please contact our Privacy Officer using the contact details above. Additional information, including the Information Privacy Principles, may be found on the Privacy Commissioner's website www.privacy.org.nz.