



PRIVACY POLICY

At AB, protecting the privacy and confidentiality of your personal information is a priority. We understand that any personal information provided through the course of business is entrusted with us. This Privacy Policy sets forth details on our approach to managing and safeguarding your personal information and privacy.

COLLECTION OF PERSONAL INFORMATION

At AB, we only collect personal information where necessary for AB to carry out our functions and activities as an investment manager and where required to enable us to comply with obligations under law.

In the normal course of business we may collect personal information in order to carry out and administer investments in your AB account on your behalf; to maintain your account, process transactions in your account, to develop, offer and deliver to you products or services; to answer queries and deal with complaints; to conduct our internal business operations (including various legal and regulatory requirements) and to manage our client relationships.

The personal information we may gather and hold will vary, but may include:

- + Personal information such as names, addresses or contact details of beneficial owners or others named in account documentation, applications or other forms completed by prospective AB clients. This information is collected as part of client on-boarding procedures and in accordance with various legal and compliance obligations.
- + Generally, we will not collect sensitive information about you unless this is required to enable us to provide you with our services as required by applicable law. If we need sensitive information, we will ask for your consent when we collect this information.
- + Personal information may be collected in the course of you subscribing to AB publications offered online or seminars attended, such as your name and contact details as provided during registration
- + If you access this site, we may collect information about your visits by using cookies. More information on the use of cookies is detailed below.

In the case of personal information required to facilitate account openings and delivery of AB financial services, if the information requested is not provided, or if the information you provide us is incomplete or inaccurate, we may be delayed in, or prevented from, processing or accepting your application or opening your account. We may also be delayed in or prevented from providing to you any products or services, administering your Investments, providing information to you or otherwise meeting our obligations to you.

ALLIANCEBERNSTEIN WEBSITE AND INFORMATION GATHERED THROUGH "COOKIES".

The AB website, similar to many websites, places an anonymous "cookie"-a small computer file-on your computer while you are using the website. These cookies allow us to collect general usage information – including understanding how many individuals visit the site, how frequently they return and what information they view most often.

These cookies do not reveal your identity to us or provide us with personally identifiable information about your use of the site. You can delete the cookie from your computer by clicking the "Log Out" button in the navigation bar when you leave the site.

OUR WEBSITE E-MAIL EMPLOYS PERSONAL "COOKIES" TO COLLECT PERSONAL INFORMATION

Website e-mail messages sent by AB include an encrypted file containing your contact information. If you choose to visit the site by clicking on a link in the e-mail, the site places a personal cookie on your computer, allowing us to collect personally identifiable information about your use of the site.

We use this information to understand how our website and website e-mail is used, including the number, frequency and duration of your visits to each page as well as your path of navigation. This information is held in an AB database, which is accessible only to employees of AB. Information about individual user traffic is held for up to six months and is not shared with any third parties.

You can delete the cookie from your computer by clicking the "Log Out" button in the navigation bar when you leave the site.

AUSTRALIAN PREMISES - CCTV

Our Australian offices have closed circuit televisions ("CCTV"). As a result, your image may be captured if you visit one of our Australian premises. The CCTVs are used as a deterrent to verify identity, to support access control data by remote staff within the AB group, to facilitate investigations and to assist the AB group to remotely manage vendors from a distance. The CCTVs do not record personal workspace or audio information. Footage is recorded locally within Australia and stored for 30 days and it is only ever retrieved and reviewed in the event of an incident related to the above listed purposes. The footage is overwritten every 30 days and no copies are retained after that period.

HOLDING OF INFORMATION

We have strict policies and procedures to safeguard personal information collected about our clients (or former clients) which include (1) restricting access and (2) maintaining physical, electronic, and procedural safeguards that comply with appropriate standards for protecting such information.

HOW IS PERSONAL INFORMATION USED?

The personal information that AB collects may be used to:

- + Provide you with our products and services or with other information that you have requested from time to time;
- + Notify you about other AB services or products;
- + Manage our relationship with you;
- + Help AB manage and develop its products and services;
- + Undertake planning and statistical analysis;
- + Recruit employees and contractors
- + Fulfil our legal and regulatory obligations.

DISCLOSURE OF INFORMATION TO OTHERS

To be able to serve our clients and to provide financial products efficiently and accurately, it is sometimes necessary to share your information with other parties.

We may share your personal information in connection with our provision of products and services with staff within the global AB group of companies who operate in locations all around the globe

We also utilize the services of 3rd party companies in various countries who perform administrative services (such as IT services; unit registry or custodial services; back-office functions, etc.) for AB or on our behalf. We may share your personal information with these external parties.

We may disclose your personal information:

- + internally to our staff;
- + to our related bodies corporate;
- + to any person where necessary in connection with the provision of our products or services;
- + to our professional advisers such as auditors, accountants and lawyers, insurance companies, property managers, consistent with normal business practices and legal obligations;
- + to third parties we may engage from time to time to assist us in the promotion of our products and services, and who may receive limited personal information for that purpose; and
- + to external service providers (on a confidential basis) so they can provide us services related to our business, for example mailing services, IT services, unit registry and custodial services as well as archival services.

AB and its related entities may use your personal information for the purpose of directly marketing their products or services to you. You may withdraw your consent to the use of personal information for direct marketing at any time by contacting us.

Some of the persons or entities listed above may be located or perform services overseas. As a result, your personal information may be disclosed to a recipient in a foreign country. Where this happens we will seek by contract or other means to ensure your personal information is protected.

PRIVACY ENQUIRIES

If you have questions about any personal information that may have been collected about you OR a request for your personal information, you can contact our Privacy Officer at the contact details listed below.

Generally, we will provide you with information we have collected about you, unless there are circumstances that exist which preclude us from doing so (for example, if providing information may prejudice an enforcement related activity

underway by a relevant body). In the event that we are unable to provide you with requested information, we will provide you with a reason for the decision.

Privacy Officer

AB
Level 32, Aurora Place
88 Phillip Street
Sydney NSW 2000
Phone: 02 9255 1200
Fax: 02 9247 9445
Email: privacyaustralia@abglobal.com

CHANGING PERSONAL INFORMATION

If you wish to update your personal information that you believe may be inaccurate, out-of-date, incomplete, irrelevant or misleading, you may write to our Privacy Officer to request that the information be updated or deleted.

PRIVACY COMPLAINTS AND BREACHES

Despite our best efforts, client complaints may occasionally arise, and they will be handled in a prompt, thorough and professional manner. We have established procedures for dealing with complaints, including any complaints which may relate to privacy or handling of personal information.

AB is committed to a culture in which complaints are acknowledged, addressed and handled in line with industry best practices. Effective complaints management can enhance customer satisfaction by creating a customer focused environment that is open to feedback and continuous improvement thereby enhancing AB's delivery of financial services.

Privacy Complaints which constitute Errors are to be handled in accordance with the AB Statement of Policy and Procedures on Error Reporting and Escalation. This includes a review to determine whether a breach of privacy practices or the Australian Privacy Principles or relevant laws may have occurred. In such circumstances where a determination has been made that a breach has transpired, it will be handled in accordance with AB's Error and Breach reporting practices and include notifications to required parties.

Our Complaints Policy is available [here](#) and our Complaints Officer may be contacted at the following:

Complaints Officer

AB
Level 32, Aurora Place
88 Phillip Street
Sydney NSW 2000
Phone: 02 9255 1200
Fax: 02 9247 9445
Email: ComplaintsAustralia@abglobal.com