

# Morningstar Privacy Policy

---

Morningstar Research Ltd  
Level 2, 29-33 Shortland Street  
PO Box 105170  
Auckland Central, New Zealand

---

## Your Privacy is Important

Morningstar Research Ltd ("Morningstar") recognises that maintaining the privacy of your Personal Information is important and is committed to protecting any Personal Information which it holds. Morningstar's main business activities are as an independent provider of investment information services and tools to individuals and businesses. This Privacy Policy describes the way Morningstar will manage and protect any Personal Information that it collects or that is provided to it in the course of its business activities.

## Who Must Comply with this Policy

Morningstar, its employees, and contractors.

## Definitions

"Personal Information" means information or an opinion (including information or an opinion forming part of a database) whether true or not, and whether recorded in a material form or not, from which the identity of an individual is apparent, or can reasonably be ascertained (for example, business contact details).

## Morningstar's Policy on Handling of Personal Information

### Collection of Personal Information:

Morningstar will collect Personal Information in the course of providing its investment information services or tools to individuals or businesses. Morningstar collects Personal Information that is necessary for it to perform functions associated with its business activities, which are primarily the provision of general investment information services and tools to individuals and businesses.

Morningstar usually collects any contact details directly from you; for example, on forms that you complete, from face to face meetings, interviews, business cards, telephone conversations and other general direct contact that it has with you. However, Morningstar may also receive contact details from your employer who nominates you as a potential or existing customer or from its related companies (including related Morningstar international offices).

The information that Morningstar collects will usually include personal contact details such as your name, address and contact numbers (for example, information contained on business cards).

Morningstar may also collect and record any other information that you provide to it at the time of requesting subscription to our information sources.

### Use and Disclosure of Personal Information:

Morningstar understands the importance of protecting your privacy.

Any information that Morningstar collects about you will usually be used to provide you or a business with which you are associated with any of our investment information services or tools that have been requested or subscribed to.

Morningstar may also use your Personal Information to provide you with information about other investment information services and tools or any other products or services that it or its related companies offer from time to time. Morningstar may disclose your Personal Information to its related companies for that purpose. If you do not want Morningstar to use your information for these purposes contact our office on +64 9 915 6770.

In respect of all of the uses described above, Morningstar may disclose your Personal Information to organisations to whom it or its related companies outsource functions, such as mailing

services, call centres or information technology services, but only so that those organisations can perform those functions.

### Security and Quality of Personal Information:

Morningstar will take all reasonable steps to ensure that any Personal Information which it holds is protected from misuse and loss and from unauthorised access, modification and disclosure and to ensure that any Personal Information which it holds is accurate and up to date.

Generally, Morningstar will, upon request, amend your Personal Information which is inaccurate, incomplete or out of date. However, if Morningstar disagrees with your request, it will, upon your further request, take reasonable steps to associate with the appropriate record a statement that you claim the information is inaccurate, incomplete or out of date (whichever is relevant).

Morningstar appreciates any assistance you might give it to keep any Personal Information that it holds up to date and accurate. Please feel free to contact Morningstar if your Personal Information changes in any way. Contact details for updating or correcting your Personal Information are set out at the end of this Privacy Policy.

### Access to Personal Information:

In most cases, Morningstar will give you access to any Personal Information that it holds. Morningstar will handle all requests for access in accordance with the NPPs. In some cases, consistently with the National Privacy Principles, Morningstar may refuse to give you access to Personal Information it holds about you. If Morningstar refuses to give you access it will provide you with reasons for its refusal.

### Handling of Access Correction and Complaints:

All requests for access, corrections, complaints or queries should be directed (or if attended to, then internally copied) to the Privacy Officer at Morningstar who can be contacted as follows:

Privacy Officer  
Morningstar  
Level 2, 29-33 Shortland Street  
PO Box 105170  
Auckland Central, New Zealand  
Tel: +64 9 915 6770  
Fax: +64 9 915 6780

Additionally, if you wish to get more information about the way that Morningstar handles your Personal Information you should contact our Privacy Officer on the contact details set out above.