

## **PRIVACY POLICY ((Current Version Date 25 June 2020))**

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Milton Corporation Limited (Milton) values and respects the confidentiality of personal information provided to us.

This policy details how your personal information may be handled by Milton and has been prepared in accordance with the Privacy Act 1988 (Including the Australian Privacy Principles (APPs) which came in to effect on the 12 March 2014) to protect your personal information.

This policy can be downloaded from the company's website <http://milton.com.au> or you can request a copy to be mailed to you free of charge by contacting Milton on +61 2 80065357.

### **1. What is personal information?**

Personal information is any information or opinions about you, as an individual, that allows others to identify you. Personal information that Milton collects may include your name, address, email address, gender, telephone number, security holder number, tax file number and bank account details.

Milton does not collect information about your political or religious beliefs, or ethnic background.

### **2. Collection of Solicited Personal Information**

As a public company listed on the Australian Securities Exchange (ASX), Milton is required by the Corporations Act 2001(Cth) and the ASX Listing Rules to collect and disclose shareholders' personal information to maintain and operate its share registry.

Milton has engaged the share registry service provider Link Market Services Limited (Link), to collect, hold and utilize shareholders' personal information for these purposes.

Link is bound by the confidentiality terms and conditions of the registry agreement between Link and Milton and is bound to comply with the provisions of the Privacy Act 1988 (Cth) and guidelines concerning the handling of personal information.

Link's Privacy Policy can be downloaded directly from its website at:  
[https://www.linkgroup.com/docs/Link\\_Group\\_Privacy\\_Policy.pdf](https://www.linkgroup.com/docs/Link_Group_Privacy_Policy.pdf)

### **3. Notification of Collection of Personal Information**

Milton will take the necessary steps either to notify you of the collection of personal information or to ensure that you are aware of it, at or before the time of collection, or as soon as practicable afterwards.

Where shareholder personal information is collected through Link and where a form is used, it will generally contain a collection notice (or reference to where a collection notice can be obtained) and individuals may be asked to confirm they have reviewed that notice. Similarly, if you contact Link, you may hear a recorded privacy script at the commencement of the call.

### **4. Following Links from Milton's Website**

Milton's website may contain links to other sites. Such other sites may also make use of their own cookies and will have their own privacy policies. You should carefully review the privacy policies and practices of other sites, as we cannot control or be responsible for their privacy practices. We do not accept any liability for the privacy practices of such third party websites and your use of such websites is at your own risk.

### **5. Integrity of Personal Information**

Milton takes reasonable steps to ensure that the information we hold about you is relevant, accurate, up-to-date, and complete. Further, we take reasonable steps to ensure that the personal information Milton uses or discloses is accurate, up-to-date, complete and relevant, having regard to the purpose of the use or disclosure.

Milton also takes all reasonable and practicable steps to protect the personal information we hold against loss, unauthorised access, misuse, modification, disclosure or interference.

When we no longer need the personal information we hold about you, we will take all reasonable and practicable steps to de-identify or destroy the information in a secure manner. Alternatively, Milton will take reasonable steps to protect the information from misuse or unauthorised disclosure.

## **6. Access, Updating and Correcting your Personal Information**

You have the right to access the personal information we hold about you. Milton encourages you to contact us to correct any personal information we hold that is out-of-date, incorrect, incomplete or misleading. In order to ensure that your privacy is protected, we strongly urge you not to provide any personal information that is not required or that we do not ask for.

Milton or Link will not charge a fee for any correction or updating of any personal information we hold on you.

If you have provided our share registry with your email address for communications, you can delete it at any time by contacting Link on +61 1800 641 024 or through the share registry web portal

<https://investorcentre.linkmarketservices.com.au/Login/Login>. If you have provided your email address to Milton directly, you can contact Milton and request details to be deleted.

If your email address is deleted, we may be unable to provide you with some services and benefits in connection with your share holding.

## **7. Use or disclosure of Personal Information**

Milton will only use or disclose personal information for business purposes or because it is required under a relevant law or regulation.

Information collected and held by Link on behalf of Milton may be used for:

- Assisting shareholders with their queries
- Preparation of internal management reports
- Payment of dividends to shareholders
- Distribution of financial results, annual reports and other corporate communications to shareholders
- Gathering and aggregating information for statistical and analytical purposes.
- Complying with our legal and regulatory obligations

The Corporations Act 2001 (Cth) requires Milton to allow anyone to inspect the register of shareholders which contains names and addresses of shareholders.

We do not sell personal information, and we do not give personal information to other organisations unless one or more of the following situations applies:

- We have consent from the individual;
- The individual would reasonably expect, or has been advised that personal information may be used or disclosed;
- If the use or disclosure is required by lawful authority; or
- If the use or disclosure relates to one or more Permitted General Situations listed under s 16A of the Privacy Act 1988 including (but not limited to) a serious and imminent threat to somebody's life or health, or if it is reasonably necessary for law enforcement.

## **8. Unsolicited Personal Information**

Milton may receive 'unsolicited personal information' where personal information received about an individual has not been requested by Milton. If Milton receives 'unsolicited personal information' that it determines could not have been collected via solicited means, Milton will take the necessary action to destroy or de-identify such personal information as soon as practicable provided it is permitted by law. Alternatively, Milton will take reasonable steps to protect the information from misuse or unauthorised disclosure. Disclosure of unsolicited information will be made where it is required or permitted by law.

## **9. Pseudonymity and Anonymity**

When contacting Milton, you generally have the right to remain anonymous (nameless) or to use a pseudonym (fictitious name) to protect your identity. However, if you wish to make enquiries about specific shareholder details, we may need to identify you first, before we can lawfully disclose personal information.

## 10. Direct Marketing

If you do not wish to receive any marketing material, please inform us by using any of the methods;

*Contact Our Share Registry :*

Telephone : +61 1800 641 024

E Mail : [milton@linkmarketservices.com.au](mailto:milton@linkmarketservices.com.au)

*Contact Milton :*

Telephone : +61 2 8006 5357

E Mail : [general@milton.com.au](mailto:general@milton.com.au)

## 11. Making a Privacy Complaint

If you have any questions, would like to provide feedback or make a complaint about how we handle personal information, please contact us by phone on +61 28006 5357, email us on [general@milton.com.au](mailto:general@milton.com.au) or mail to P O Box R1836, Royal Exchange, Sydney NSW, 1225.

If your complaint relates to how our share registry handled your personal information, you may contact Link Market Services by:

Phone: +61 1800 502 355 or;

Email: [privacy.officer@linkgroup.com](mailto:privacy.officer@linkgroup.com) or;

Mail: The Privacy Officer, Link Group, Locked Bag A14, Sydney South NSW 1235.

You may also direct any complaints relating to handling of personal information by our share registry to Milton directly using the contact details given above.

We will take the necessary steps to resolve your queries within a reasonable time (usually within 30 calendar days).

If your complaint is not resolved satisfactorily, you may also contact the Office of the Australian Information Commissioner by calling them by phone on +61 1300 363 992, online at [www.oaic.gov.au](http://www.oaic.gov.au) or writing to the Office of the Australian Information Commissioner, GPO Box 5218 Sydney NSW 2001.