

Privacy Policy

Presidian Group

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Table of Contents

Privacy Policy.....	1
1. What are personal information and sensitive information?	5
2. Types of personal information and sensitive information we collect	5
3. Why we collect your personal information and sensitive information	5
4. How we collect your personal information and sensitive information.....	6
5. Disclosing your personal information and sensitive information.....	6
6. What if we can't collect your personal information?	7
7. Marketing our products and services to you.....	7
8. Protection of your personal information.....	7
9. Links	8
10. Accessing or correcting your information	8
11. Cookies.....	9
12. Do we disclose your personal information to anyone outside Australia?	10
13. Complaints.....	10
14. Contact details.....	10
15. Changes to this policy	10

Privacy Policy

Presidian Group is committed to protecting the privacy and the rights of individuals with whom it deals. This policy sets out how we collect and manage personal information and sensitive information about those individuals and unless we have notified you otherwise contains our privacy collection statement. The Presidian Group includes:

- Davantage Group Pty Ltd ACN 161 967 166
- Presidian Management Services Pty Ltd ACN 166 382 369

1. What are personal information and sensitive information?

Personal information is defined in the *Privacy Act 1988* (Cth). Generally, it is information or an opinion about an identified individual or an individual who is reasonably identifiable. This may include your name, address, telephone number, email address, profession or occupation.

Sensitive information includes:

- information about your racial or ethnic background, political opinions, membership of political, professional or trade associations or trade unions, religious beliefs or affiliations, philosophical beliefs, sexual orientation or practices or criminal record (where that information is personal information);
- health information and genetic information; and
- biometric templates and biometric information that is used for the purpose of automated biometric verification or biometric identification.

2. Types of personal information and sensitive information we collect

The types of personal information we may collect (depending on the nature of our relationship and dealings with you) include:

- your name
- address (residential and mailing address);
- contact details (telephone number, fax number and email address);
- age, date of birth and marital status
- information about your financial affairs (e.g. payment details and bank account details,

We may also collect the following information depending on the products and services we provide you:

- credit card details;
- bank account numbers;
- other information as required by the Anti-Money Laundering Counter-Terrorism Financing Act 2006 (Cth).

When you visit our websites, we may collect statistics on the number, date and time of your visit, the number of pages viewed and the manner in which you navigate through our sites.

When you call us, we may collect statistics on the number, date and time of your call and the manner in which you navigated through our telephony system. We may also monitor and/or record in-coming and out-going telephone calls for taxation, verification, substantiation and quality assurance purposes.

3. Why we collect your personal information and sensitive information

We collect your personal information to perform our business activities and functions. We collect, hold, use and disclose your personal information to provide you with products and services you have requested, and for the administration of those products and services.

We may also collect, hold, use and disclose your personal information to:

- conduct our business administration and operations (such as accounting, risk management,

record keeping, statistical analysis, research, planning, systems development, testing and staff training);

- conduct our marketing (including direct marketing), planning, new product or service development, quality control and research;
- conduct customer satisfaction surveys / Net Promoter Score;
- answer your enquiries and respond to any complaints made by you;
- send you material about other products and services offered by us;
- assess and monitor the use and performance of our websites and provide you with access to secure areas of our websites;
- up-date our records and keep your contact detail updated; and
- comply with any law, rule or regulation or request or direction from any Court, regulator, law enforcement body or governmental authority.

We may share personal information about you with our related bodies corporate, contractors and service providers for any of the purposes outlined above.

4. How we collect your personal information and sensitive information

Where it is reasonable and practical to do so, we will always collect personal information and sensitive information directly from you. How we collect your personal information will depend on how you interact with us. For example, we may collect it through your access and use of our websites, during your conversations with our representatives or from application forms you complete.

There are occasions when we may need to collect your personal information or sensitive information from third parties, with or without your direct involvement. We will generally obtain your prior consent if we need to obtain your sensitive information from third parties (unless a relevant exception applies). Depending on the products or services you request or receive, the third parties from whom we may collect personal information include your third party brokers, agents or dealers, government agencies, your representatives and your advisers and other organisations who, jointly with us, provide products or services to you.

5. Disclosing your personal information and sensitive information

We may disclose your personal information to another person or organisation. Depending upon the products or services you have requested, we may disclose personal information about you to:

- our employees and related bodies corporate;
- our agents, contractors and service providers, including mail houses, web hosting providers, IT systems administrators or professional advisers such as accountants, solicitors, business advisers and consultants;
- regulatory bodies, government agencies and law enforcement bodies.
- financial institutions, payment systems operators, credit reporting bodies or debt collection agencies in relation to the processing, administration and management of products and services requested by you;
- persons acting on your behalf, including your legal adviser, financial adviser, executor, administrator, trustee, guardian or attorney;

- insurers and reinsurers in relation to insurance products and services requested by you;
- other organisations or firms, who jointly with us, provide products or services to you;

In the unlikely event that the assets and operations of our business are sold to another party, our records of personal information and sensitive information will be transferred to that party.

6. What if we can't collect your personal information?

If you do not provide us with the personal information described above then, depending on the circumstances and the nature of our relationship and dealings with you, some or all of the following may happen:

- we may be unable to provide the requested products or services to you, either to the same standard or at all;
- we may be unable to provide you with information about products and services you may want, including information about discounts, sales or special promotions; or
- we may be unable to tailor the content of our websites to your preferences and your experience of our websites may not be as enjoyable or useful.

7. Marketing our products and services to you

We may use your information to offer you products or services we believe may be of interest to you. We may contact you by telephone, mail, SMS, fax or email. You can notify us at any time if you no longer wish to receive marketing communications from us. Our contact details are set out at the end of this policy.

We do not sell personal information to other organisations to allow them to do this.

8. Protection of your personal information

We take reasonable steps to ensure your personal information is protected from misuse and loss and from unauthorised access, modification or disclosure. We may hold your information in either electronic or hard copy form. In some cases, we store records on third party servers, some of which may be located overseas.

We use a range of security measures to protect the personal information we hold, including by implementing IT security tools to protect our electronic databases.

We take reasonable steps to ensure that personal information is destroyed or de-identified when no longer needed.

When browsing our web sites, you acknowledge that the internet is not always a secure environment and that the computer and network you use contribute to the overall level of effective protection in place. You further acknowledge that any transmission of information over the internet is out of our control before it reaches our system. Only once we receive your transmission, we can take reasonable steps to ensure its security.

In order to protect your personal information online, we ask that you observe the security requirements relating to the protection of your user identification number and/or password used to access your online account. We recommend that you:

- change your password on initial access to our website;
- ensure the user identification number given to you is kept securely;
- destroy any documentation (including any email) we issue containing your password;
- memorise your user identification number and password;
- do not tell anyone of your user identification number and password;
- immediately telephone us if you suspect your online account or related email account has been breached.

9. Links

Our websites may contain hyperlinks to other sites maintained by different organisations. We do not claim any association with websites which are not clearly identified as our own and do not take any responsibility for their content. Hyperlink users should observe such websites' terms of use, privacy policies and copyright, which may or may not comply with the same privacy standards that we do.

10. Accessing or correcting your information

You may request access to any personal information or sensitive information that we hold about you. The type of information you request will determine the length of time we take to respond. We will generally respond using the same communication method by which your request was originally made.

If you believe that personal information or sensitive information that we hold about you is out-of-date, incomplete, inaccurate, irrelevant or misleading, then you may request that we correct it.

If you wish to request access to, or correction of, your information please contact us using the contact details in section 14 of this Privacy Policy.

On occasion we will ask that you put your request in writing. This may include instances where you want copies of material or access to archived information or if the nature of your application makes it necessary for us to retain a record of your request.

You may be able to access some personal information via our customer service website. Access to personal information via the customer service website requires the use of your unique user identification number and password. No personal information is openly posted on the Internet. If you have difficulty finding the information you want or in using the website, please contact us.

In some circumstances, we may charge an administration fee to retrieve and provide you with access to your information, based on our reasonable costs in providing the information to you. If we intend to charge an administration fee we will give you an estimate of this fee so you can confirm you still want us to proceed with your request.

We do not impose any charge for submitting a request for access or correction, or for any activities required for us to correct information or update our records in response to a correction request. We are entitled to refuse you access to (or correction of) your information in certain circumstances. For example:

- you may not be able to access personal information that:
 - would reveal personal information or sensitive information about another person and have an unreasonable impact on their privacy;
 - impact a commercially sensitive decision making process; or
 - which we are prevented by law from disclosing; and
- we may refuse to correct any of your personal information if we do not agree that it requires correction.

If we refuse your request, we will provide you with our reasons for the refusal.

11. Cookies

We may collect personal information about you through the use of cookies. When you access our website, we may send a “cookies” (which is a small summary file containing a unique ID number) to your computer. This enables us to recognise your computer and greet you each time you visit our website without bothering you with a request to register. It also enables us to keep track of products or services you view so that we can send you news about those products or services. We also use cookies to measure traffic patterns, to determine which areas of our website have been visited and to measure transaction patterns in the aggregate. We use this to research our users’ habits so that we can improve our online products and services. If you do not wish to receive cookies, you can set your browser so that your computer does not accept them.

We may log IP addresses (that is, the electronic addresses of computers connected to the internet) to analyse trends, administer the website, track users movements, and gather broad demographic information.

12. Do we disclose your personal information to anyone outside Australia?

The Presidian Group business activities are conducted in Australia and overseas. In order to provide our services to our customers we may engage other Service Providers to perform certain functions. These functions may involve the hosting or accessing of personal information, by the Service Provider outside Australia.

Presidian Group's overseas service providers may be required to disclose certain personal information and sensitive information due to their own regulatory obligations under foreign laws. The *Privacy Act 1988* (Cth) does not require the Presidian Group to prevent such disclosures, where the disclosure is required by an applicable law of a foreign country.

13. Complaints

If you have any questions regarding this Privacy Policy or any concerns or complaints regarding our treatment of your personal information (including where you consider that we have breached the Australian Privacy Principles), or if you wish to request access to (or correction of) your information, we invite you to contact us. Contact details are set out in section 14 below.

We will aim to answer your question, concern, request or complaint in a timely and satisfactory manner. If we cannot resolve the matter at the point of first contact, a representative will be in contact within a reasonable time to advise:

- who will be handling your enquiry; and
- how our investigations are progressing.

14. Contact details

Our contact details are:

All customers:

Email: Customerrelations@presidiangroup.com

Mail: The Privacy Officer
Presidian Group
PO BOX 9091
Traralgon 3184
VIC, Australia

Phone: 1800 888 760

Facsimile: 03 5177 4050

15. Changes to this policy

We reserve the right to change this Privacy Policy from time to time by posting an updated version on this website.