



PRIVACY STATEMENT

VERSION 1

DOCUMENT OWNER: COMPLIANCE OFFICER
EFFECTIVE DATE: DECEMBER 2011

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PRIVACY STATEMENT

1. Introduction

At Excela Limited (“Excela”, “the company”, “us”, “we”, “our”) we are committed to safeguarding your privacy by ensuring personal information about you and other individuals is protected in a way that observes our own corporate values, as well as complying with the requirements of the National Privacy Principles of the *Privacy Act 1988* (Commonwealth) (the “Act”).

The Privacy Statement (“Statement”) sets out the minimum procedures for safeguarding your privacy.

2. Scope of statement

This statement applies to Excela, subsidiary companies, and its agents. The objective of the Act is to set a standard for protecting the privacy of all individuals. The National Privacy Principles and the requirements of them are explained in detail below.

2.1 Privacy and the Company’s corporate relationships

Excela is a member of the Excela Group (the “Group”) and may refer tasks to other related companies, including but not limited to:

- Excela Equities Ltd ACN 010 763 041; and
- Excela Funds Management Pty Ltd ACN 124 028 244.

3. Definitions

3.1 Personal Information

Your personal information includes details such as name, address, date of birth and contact details (e.g. phone and fax numbers, email addresses etc).

3.2 Sensitive Information

Sensitive information is a subset of personal information and by its "sensitive" nature may have the potential to be used to discriminate against someone. Examples of sensitive information include but are not limited to personal information or opinions on your health, criminal records, etc. Sensitive information can only be recorded if it is relevant to do so and with your consent.

4. Excela Privacy Principles

4.1 Collection of personal information (National Privacy Principle 1)

Where you have requested a product or service, Excela collects your personal information where it is necessary primarily to identify you or your business entity and to assess and establish the suitability of the product or service requested.

4.2 Your rights and the disclosure of personal information

You need not give personal information about yourself that may be requested by us to supply Excela products and services. However, without that information, Excela may not be able to provide you with the products or services you have requested.

4.3 Use of information (National Privacy Principle 2)

Excela collects your personal information to ensure that we are able to provide you with the products and services most appropriate to your needs. Excela may use your personal information for related purposes, such as a credit agency reference, in accordance with the National Privacy Principles. Your personal information may also be used to complete internal business functions such as auditing, management reporting, research, product development and planning.

4.4 Disclosure of Information (National Privacy Principle 2)

In providing products and services Excela may disclose your personal information to organisations that carry out functions on behalf of Excela. This may include but not be limited to sales agents, mailing houses (for the purposes of issuing invitations to attend seminars and other correspondence relating to new opportunities with us), and other services providers we may use or recommend in the provision of secondary services. This includes external auditors, computer and information technology service providers for computer, internet, and related functions.

Although Excela undertakes its best endeavours to ensure your personal information is safeguarded in a manner consistent with its privacy statement and only used to carry out functions on its behalf, we cannot accept liability for any misuse of your personal information by those organisations or individuals.

4.5 Marketing

Excela may disclose your personal information to other companies within the Group to offer you other products and services and to send marketing material about other products and services that may be of interest to you.

If you do not wish to receive information about these products and services, please tell us by calling our Customer Service Team on 1800 110 808.

4.6 Data Quality (National Privacy Principle 3)

Excela must ensure your personal information collected, used or disclosed is, at all times, accurate, complete and up to date.

You should advise us immediately when you become aware that any information we hold about you is incorrect or out of date. Excela undertakes to amend its records as soon as practical after it is advised subject to the validity of the request being confirmed.

4.7 Data Security (National Privacy Principle 4)

Excela will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access, modification and disclosure. Your information may be stored in paper or electronic format.

Security measures implemented with respect to Excela's IT systems will take account of internal and external recommendations, general industry practice and technological development in the provision of IT security services.

Excela's IT security measures include state of the art firewall technology, encryption of usernames and passwords over the internet and phone services and provision of unique user identification and password codes to your account(s).

When using our internet services we may use "cookies" to ascertain product preferences and tailor future visits to the site to suit them. Most web browsers can be configured to not accept cookies, however the site functionality may be restricted as a result. Other than statistical information we do not collect information about you through our website other than where you provide it.

4.8 Openness to Excela practices (National Privacy Principle 5)

Information in this statement gives you some insight into how we manage your personal information and your rights. For further information on the information handling practices of Excela contact the Customer Service Team on 1800 110 808 and ask to speak with the Compliance Officer.

4.9 Access (National Privacy Principle 6)

You are entitled to access personal information we may hold about you. The type of information that you may request is your personal information as well as any comments, opinions and file notes that Excela holds about you.

Excela will process your request within a reasonable time, generally 5 business days for a straight forward request. However, additional time may be needed depending on the nature of the request.

Excela is not required to provide you with access to your information in some cases i.e. where the law allows Excela to deny access. If Excela denies you access to your information you will be advised the reason why.

A request to access your personal information must be directed to the Excela Compliance Officer by: Telephone 07 3308 1834; Fax 07 3308 1800; Post GPO Box 808, Brisbane QLD, 4001 or Email Zainab.Adams@excela.com.au.

4.10 Identifiers (National Privacy Principle 7)

Identifiers are unique numbers that a Commonwealth Government agency has assigned to you. These include tax file numbers.

Collection of tax file numbers (“TFN”) is authorised and its use and disclosure are strictly regulated by tax and privacy laws. Quotation is not compulsory, however there may be tax implications for individuals who choose not to quote their TFN or claim an exemption. Excela will use and disclose this information only for tax related purposes.

Excela maintains the necessary security to ensure that TFN information is protected, by such safeguards as are reasonable in the circumstances, to prevent loss, unauthorised access, use, modification or disclosure, and any other misuse.

Excela will remove and destroy all records of a TFN as instructed.

4.11 Anonymity (National Privacy Principle 8)

In complying with the National Privacy Principles, Excela will allow its customers to interact anonymously wherever it is lawful and practical to do so.

4.12 Trans Border (overseas) Data Flows (National Privacy Principle 9)

Should you request a transaction or service where your personal information may be transferred to another country, your information may be transferred to a country that does not have the same privacy laws as Australia.

This may occur in instances where you request an international telegraphic transfer where your name and account details may be divulged.

4.13 Sensitive Information (National Privacy Principle 10)

If it is necessary to record sensitive information (such as health related information), we must obtain your specific consent to collect that information. Sensitive information is generally not required for most Excela products and services. You are entitled to access any information that we record.

4.14 Information required for Statutory Compliance Purposes

In addition to questions that Excela may ask to ensure general statutory compliance there may be special circumstances where the company or its agents are required to seek additional information about you.



4.15 Further Information or Questions

It is the Compliance Officer's responsibility to manage, investigate, coordinate and respond to your inquiries, disputes lodged, information access and correction requests in accordance with Excela's procedures and the National Privacy Principles.

The Compliance Officer will also provide you with contact details for the Privacy Commissioner if required where the company is unable to resolve a dispute to your satisfaction.

The Compliance Officer can be contacted between 9am and 5pm Monday to Friday (excluding national public holidays) by:

Telephone	07 3308 1834
Post	Level 21 333 Ann Street Brisbane QLD 4001
Email	Zainab.Adams@excela.com.au
Facsimile	07 3308 1800

PRIVACY DECLARATION & CONSENT

Privacy of Your Personal Information

At Excela we are committed to safeguarding your privacy by ensuring personal information about you and other individuals is protected in a way that observes our own corporate values, as well as complying with the requirements of the National Privacy Principles of the *Privacy Act 1988* (Commonwealth).

Collection, Use and Disclosure of Your Personal Information

Where you have requested a product or service, Excela collects your personal information where it is necessary primarily to identify you or your business entity, to assess and establish the suitability of the product or service requested, and to facilitate payment for the provision of the product or service.

By providing your personal information to us you acknowledge and consent that:

1. we can collect and use your personal information for the following purposes:
 - a. to assess your current financial situation, needs and objectives; and
 - b. to assess the suitability of other products and services we may provide via companies in the Excela Group (“the Group”);
2. we can collect your personal information from and disclose it on a confidential basis to the following: companies in the Group, other service providers, government departments, and law enforcement agencies; and
3. you represent to us that where you provide personal information to us about another person, you are authorised to provide that information to us, and that you will inform that person who we are, how we use and disclose their information, and that they can gain access to that information.

Marketing Purposes

We may disclose your personal information on a confidential basis to companies in the Group so that they can also offer you products and services.

By providing your personal information to us you acknowledge and consent that:

1. we are collecting and using your personal information to contact you to provide information about products and services offered by the Group; and
2. you will inform us if you do not want your personal information to be used or disclosed to companies in the Group for these marketing purposes.