

## **TOTAL EDEN McCRACKEN PRIVACY POLICY**

### **Our commitment to protect your privacy**

In your relationship with us, you share personal information with us. This information may include your name, address, telephone numbers, email address, tax file number, bank account and credit card details, date of birth and other personal details in connection with transactions entered into by you with us.

We recognise the importance of your privacy and how important it is for us to protect your personal information. We are committed to protecting personal information which we hold and to complying with all relevant privacy laws in the jurisdictions in which we operate. This document describes how we manage your personal information and safeguard your privacy.

### **How do we collect and hold personal information about you?**

We will only collect personal information that is necessary for us to lawfully and ethically carry on our business; to provide the goods and services our customers require; let our customers know about other products and/or services which might interest them; and to assist us generally in managing transactions with our customers, suppliers, consumers and other contacts with us.

The kinds of personal information we collect and hold will depend upon the type of products and services we provide to you or obtain from you. It may be contained in:

- information you give us when you request a product or service from us or enter a competition of ours;
- credit related information necessary to assess applications for credit and personal guarantees;
- records of communications between us and you; and
- if you have or had one of our products, information about the use of that product or your opinions about that product recorded when you respond to a survey.

The personal information we request is optional, but if you choose not to provide necessary personal information to us, we may not be able to fulfil your request or provide you with the product or service you require. Sometimes, however, there are situations where we are required by law to collect certain personal information from you and, if this is the case, we will inform you of the law that imposes this requirement.

We will collect personal information directly from you whenever it is reasonable practicable to do so. We may, at times, also collect personal information from other parties such as other members of the Alesco Group (except where you tell us not to), credit reporting and collection agencies, unrelated third parties as well as from your agents or representatives (such as your legal or financial adviser) and from publicly available sources of information.

### **What do we do with the personal information we collect?**

We respect your privacy. Any personal information which we collect about you will only be used for the purposes for which it is collected or for related purposes and will not be

disclosed outside of the Alesco Group without your consent, except where described in this privacy policy.

We may keep and file personal information you provide when dealing with us to assist us in providing you with our services and/or information of interest in respect of your business. For example, another member of the Alesco Group of companies may send publications or other market information on its products and services to you or follow up on your interest in particular products and services, unless you tell us not to.

In order to do this, we disclose your personal information to those employees or advisers who need to know that information to assist us in providing you with our range of products and services.

We may also disclose information to affiliates and other third parties necessary to process your transactions or service your account (including our print service providers, call centres and mail houses, our accountants, auditors and lawyers and credit reporting and collection agencies). We may also disclose your personal information in corporate transactions involving the transfer of all or part of our assets or business or in a corporate restructure. If we do this, we generally require these parties to protect your information in the same way we do.

We may also be required or authorised by law to disclose your personal information. For example, we may disclose your personal information to a court in response to a subpoena or to the relevant Taxation Agency. We may also disclose information to other persons where you have provided your consent to do so and to credit reporting agencies.

Personal information collected by us may be stored and processed in any country in which we maintain facilities, but will continue to be subject to the terms of this privacy policy. You consent to any such transfer of information out of your country.

Once we no longer require your personal information for any of the purposes for which it was collected we will, subject to any legal obligations and responsibilities, take reasonable steps to destroy or de-identify your personal information.

### **How do we protect your personal information?**

We take all reasonable steps to protect your personal information from loss, misuse, modification, or unauthorised access and disclosure. These steps include access control for our buildings, confidentiality obligations imposed on our employees and use of security measures for computer system access. We do not, however, accept any responsibility for the unauthorised access or use of personal information held by us.

### **Your privacy on our websites**

This privacy policy also applies to the websites operated by us under various domain names. We operate websites which may utilise 'cookies' to collect personal information. If you transact electronically with another member of the Alesco Group, you should refer to the website of that member for more information on its website privacy and security procedures.

When you visit a website of ours, we may collect the following personal information from you: your name, information you volunteer such as survey information, email addresses and domain name.

While we take care that the personal information you give us on our websites is protected, the Internet is not a secure environment. If you send us information, including your email address, it is sent at your own risk.

Our websites do not capture email addresses. If, however, you provide your email address to us, it may be used by us and other members of the Alesco Group to send you information relating to our products and services. If we, or another member of the Alesco Group, send you an email which you do not wish to receive in the future, please notify us or that Alesco Group business and your email address will be removed.

You may be able to access external websites, operated by companies unrelated to us, by clicking on links we have provided. Those other websites are not subject to our privacy standards and we are not responsible for their privacy practices or the content of such other websites. You should contact those websites directly to ascertain their privacy standards, policies and procedures.

#### **What rights do you have in relation to your personal information which we hold?**

We take all reasonable steps to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. If you become aware of any errors in your personal information or you change your personal details such as your name, address or bank account details, we ask you to contact us as soon as possible.

In most cases, you can gain access to personal information that we hold about you, subject to certain exceptions allowed by law. You can contact our Privacy Officer if you would like details of your personal information which we may hold or if you would like us to correct it. We will handle any request in accordance with the relevant privacy regulations. We may require you to complete a request form and we also reserve the right to charge a reasonable fee for gaining access. We will deal with requests as quickly as possible, but requests for a large amount of information, or information which is not currently in use, may require further time to process.

Generally, if you request us to do so we will amend any personal information about you held by us which is inaccurate, incomplete or out of date. If we disagree with you about the accuracy, completeness or currency of personal information held by us, if you ask we will take reasonable steps to associate with that information a statement to the effect that you claim this to be the case.

You may also contact our Privacy Officer to request us to stop using your personal information to contact you about our products and services. If you no longer conduct business with us, you can ask us to remove your personal information. You can contact our Privacy Officer if you wish to obtain more information about the way we manage personal information about you which we hold; or if you are concerned that we may have breached your privacy and wish to make a complaint.

Our Privacy Officer can be contacted at:

Alesco Corporation Limited  
Level 24  
207 Kent Street  
Sydney NSW 2000  
Phone: + 61 (2) 9248 2000  
Facsimile: +61 (2) 9248 2099  
Email: [privacy@alesco.com.au](mailto:privacy@alesco.com.au)

### **Changes to this privacy statement**

We may change our privacy policies from time to time to comply with new laws or industry codes of practice which are developed. It is your responsibility to refer to our privacy policies from time to time to familiarise yourself with any changes. We encourage you to visit our websites regularly for any updates to our privacy policies.

Total Eden McCracken Privacy Policy  
Last Updated: 1 July 2008

Prepared by the Company Secretary  
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