



Your Privacy with the SEALCORP Group

April 2003



Our privacy assurance to you

At the SEALCORP Group your privacy is important to us. From 21 December 2001 new privacy laws apply to how we collect, maintain, use and disclose your personal information. We comply with these new laws.

This brochure explains how the new laws affect the SEALCORP Group and you, including:

- the types of information that we keep on record and how we may use that information
- your privacy rights along with our general rights and obligations
- our policies in relation to how we collect, maintain, use and disclose your personal information.

Other privacy statements

When you apply for a new product or service offered or administered by us, the application form will include notices about privacy and requests for consent. Those privacy notices (called privacy statements) will specify in more detail how any information about you may be used or disclosed in relation to the particular product or service.

When you apply for or use one of our products or services or a product or service administered by us, you consent to us collecting, maintaining, using and disclosing personal information about you (provided by you or by another person) in accordance with the privacy statements in the application forms, any Agreement you sign and this brochure.

What information does the SEALCORP Group hold?

The types of information we ask for will depend on the type of product or service requested by you.

Generally, we keep a record of one or more of the following types of information about you:

- information that identifies you, such as your name and address and other identification information provided by you and people nominated by you

- if you apply for insurance, information about what is being insured, including health information about you, your income and occupation, information about your beneficiaries, and information about your claims history
- if you apply for a superannuation or investment product or service, information about your employment, beneficiaries, bank accounts for funds to be transferred to or from and, in some cases, health information about you
- transaction information relating to the product or service acquired by you, such as details of contributions and distributions for investment products
- if you apply to become an authorised representative with one of our Dealer Groups, information about your professional background, training and experience, which may include sensitive information.

All information sought is required for our business purposes, which are detailed generally in this brochure and more specifically in our application forms.

We do not actively seek to collect sensitive information (for example health information or information about any criminal record), unless it is necessary for our business purposes. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

Sometimes we act as an agent for others when collecting information about you, such as for the insurer underwriting our insurance products ('the Insurer') or on behalf of other parties ('Institutional Business clients') in our capacity as administrator. We will inform you when we do this.

How do we collect your information?

Generally, we only collect personal information about you from you, unless it is not reasonable or practical for us to do so or if you consent. For example, we may collect information from a third party, like your financial adviser, your employer for superannuation purposes, or you may be named as a beneficiary in another application for one of our products or services. We may also collect information about you from other members of the SEALCORP Group or from a publicly available source.



How do we collect information from our websites?

We collect and hold information about you via our websites when you:

- complete an online Application or other type of form
- provide us with your email address
- access and use our services through our websites.

We also collect some statistical information about visitors, via our websites (for example, the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded). Some of this statistical information is collected by using cookies. We use this information only for the purposes of evaluating our website performance (including identifying potential performance problems) and continually improving our services. None of the statistical information we prepare from information collected using cookies identifies individual visitors to our websites.

Other than statistical information, we do not collect any information about you via our websites unless you or your financial adviser provide the information to us.

How may we use your personal information?

Generally, we use your personal information to:

- help us process your application for products or services and subsequent investment directions
- effectively manage and administer these products and services (including keeping records required under superannuation laws and the Corporations Act)
- ensure our internal business operations are running smoothly, which may include fulfilling legal requirements, conducting confidential systems maintenance and testing and conducting confidential telephone call monitoring to ensure our staff are properly trained and their service to you continually improved.

If you acquire products or services from a member of the SEALCORP Group, your personal information may also be used by other members of the SEALCORP Group to analyse products and services, evaluate the needs of our customers and develop new products. Unless you tell us not to or have previously told us not to,

we may also provide access to your personal information (excluding health information) to members of the SEALCORP Group or use that information ourselves to inform you of products and services offered by any member of the SEALCORP Group or other suppliers which we think may be of interest or value to you.

Any form used to collect your information may give more specific details about the way we use your information.

What rights do we have to disclose personal information?

Generally, we must obtain your consent before we tell anyone about you, or your investments. You can give us your consent expressly (by telephone or writing to us) or it may be implied by your conduct. Sometimes the law requires or allows us to give out information about you. For example, we must tell the Australian Tax Office how much interest we pay you. Another example is giving your investment details to a court if we are ordered to do so under a subpoena.

Depending on the product or service we provide to you, if it is necessary we may also disclose your personal information to:

- our external service providers that provide services to us. This is on a confidential basis and includes organisations that provide us with financial, advisory, administrative or other services, such as investment managers of products you select, financial institutions you nominate, industry bodies, mail-houses contracted to mail information to you in relation to your products and services and archive companies
- anyone acting on your behalf, including your financial adviser or broker, their office and licensed dealer
- anyone who holds amounts on your behalf which will be transferred to or from us
- to any party acquiring an interest in our business
- to a complaints body to whom a complaint relating to a product or service is referred
- where the law requires or permits us to do so
- if you consent.



If you acquire a product or service for which we act as Administrator, Trustee, Responsible Entity, Custodian or Operator on behalf of an Institutional Business client, we may disclose personal information about you to that Institutional Business client without getting your consent. Similarly, for insurance products, we may disclose personal information about you to the Insurer without getting your consent. These parties are required to comply with the privacy laws in using any such information.

If you are a financial adviser, from time to time we may also use or give access to your personal information to the investment managers with whom you place client investments. The information we provide is limited to your name and business contact details, together with details of your funds under administration in relation to the particular investment manager, including inflow and outflow information. We do this on a confidential basis to enable those investment managers to analyse products, services and customer needs and to market products and services supplied by the investment manager that may be of interest to you. We will not provide this information to investment managers if you tell us not to. Email us at privacy@sealcorp.com.au if you prefer for your details (as listed above) not to be provided to investment managers.

We may at other times give you more details about our disclosure practices in relation to specific products or services - for example on the disclosure documents and applications we use to collect personal information about you.

Use of your personal information by Institutional Business clients

If you acquire a product or service for which we act as Administrator, Trustee, Responsible Entity, Custodian or Operator on behalf of an Institutional Business client, that Institutional Business client may use personal information about you for purposes as disclosed in its own privacy policy and in the disclosure document for the product or service you choose.

You can obtain a copy of the relevant Institutional Business client's privacy policy by contacting them directly or through us.

Use of your personal information by the Insurer

If you acquire an insurance product underwritten by the Insurer, the Insurer may use personal information about you for purposes as disclosed in its own privacy policy and in the disclosure document for the product or service you choose.

You can obtain a copy of the Insurer's privacy policy by contacting the Insurer directly or through us.

How we protect the security of your information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure.

We have physical, electronic and procedural safeguards to protect your information held by us. For example, your personal information is stored in secured office premises, in electronic databases requiring logins and passwords for access and/or at a secured warehouse. We require all staff to maintain the confidentiality of customer information.

We use secure methods to destroy or de-identify any personal information as soon as the law permits, provided the information is no longer needed by us for any purpose.

Changes to our privacy policies

We may amend this Privacy Brochure from time to time. Not all changes to our privacy policies will require your consent, for example where office security procedures are changed. We will notify you of any change to our policies that require your consent before being implemented.



What are your rights?

Unless required by law (for example to comply with a legal duty of disclosure when applying for an insurance product) you need not give us any of the personal information about you or any other person which may be requested in our communications with you. However, without that information, we may not be able to process an Application, fulfil your request or provide you with an appropriate level of service.

Where we collect information from you about another individual, for example your nominated beneficiaries, please make that individual aware of that fact and the contents of this Privacy Brochure.

Marketing opt-out

If you do not want the benefit of receiving information about products and services (which may be supplied by any member of the SEALCORP Group or other suppliers which we think may be of value or interest to you) then please tell us. You can do this at any time by either writing to us or telephoning us at ASGARD Investor Services listed on this brochure.

Access to your information

You may request access at any time to personal information held by us about you. We will process your request within a reasonable time, usually 14 days for a straightforward request. More time may be needed, depending on the nature of the request.

There is no fee for requesting access to your information, however we may charge you the reasonable costs of processing your request.

Sometimes we are not required to provide you with access. If we refuse you access to your personal information, we will tell you the reason why. If we are not required to provide you with access to the information requested, we will consider, if reasonable, whether the use of a mutually agreed intermediary would allow sufficient access to meet your needs and ours.

Correction of information

We try to ensure that all information held by us about you which we collect, use or disclose is accurate, complete and up-to-date. However, you must promptly notify us if there are any changes to your personal information.

You may ask us at any time to correct personal information held by us about you which you believe is incorrect or out-of-date. We will deal with your request within a reasonable time.

If we disagree as to the accuracy of the information, you may request that we make an appropriate notation in relation to that information noting you consider it is not accurate, complete or up-to-date.

Who is the SEALCORP Group?

Members of the SEALCORP Group include all companies that are related to SEALCORP Holdings Limited, such as its subsidiaries ASGARD Capital Management Limited, SECURITOR Financial Group Ltd, PACT Accountants Investment Group Pty Ltd, its parent, St. George Bank Limited and other subsidiaries of St. George Bank Limited. Members of the SEALCORP Group may change from time to time. Reference to 'we/us' in this brochure means each member of the SEALCORP Group holding your personal information.

If there is anything you would like to discuss, please contact us

If you have any questions or concerns about our privacy policy or practices, contact:

ASGARD Investor Services
Level 38, Central Park
152 St Georges Terrace
Perth WA 6850

PO Box 7490, Cloisters Square
Perth WA
Investor Services 1800 998 185

We will try to answer any questions you may have, correct any error on our part or resolve any complaint that you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you also have the right to complain to the Privacy Commissioner.

SEALCORP

SEALCORP Holdings Limited ABN 28 009 143 597

Investor Services 1800 998 185

Sydney
Level 12
400 George Street
Sydney NSW 2000
Telephone 02 9947 1255
Facsimile 02 9511 2366

Melbourne
Level 41, ANZ Tower
55 Collins Street
Melbourne VIC 3000
Telephone 03 9941 3355
Facsimile 03 9654 5677

Perth
Level 38, Central Park
152 St George's Terrace
Perth WA 6000
Telephone 08 9415 5655
Facsimile 08 9322 3490

Brisbane
Level 21, Central Plaza One
345 Queen Street
Brisbane QLD 4000
Telephone 07 3229 5855
Facsimile 07 3229 5877

Adelaide
Level 25, Santos House
91 King William Street
Adelaide SA 5000
Telephone 08 8212 3877
Facsimile 08 8212 4228