



PRIVACY POLICY - AUSTRALIA

Scottish Pacific Benchmark Group

The Scottish Pacific Benchmark Group includes Scottish Pacific Business Finance Pty Ltd (ABN 79 008 636 388) and Benchmark Debtor Finance Pty Ltd (94 082 607 654).

This document sets out our policy on the management of personal information which we have about individuals. Those individuals include clients to whom we have provided a facility, guarantors of both individual and company clients and individuals who are customers of our clients.

Our privacy assurance to you

Your privacy has always been important to us. As our client, or someone in a business relationship with our client, we respect your right be aware of who has information about you, what they are doing with it and why, and who else they are sharing it with. We have adopted a privacy compliance culture that cements this relationship with you. Its foundation is the new privacy laws which apply from 21 December 2001, including the National Privacy Principles. This privacy policy is issued in accordance with National Privacy Principle 5.1.

This privacy policy and other privacy documents

This privacy policy explains how we collect personal information and how we maintain, use and disclose that information. It outlines our policy in relation to the personal information we keep on record. It also provides some detail about your privacy rights along with our general rights and obligations.

When you apply for or use one of our products or services, you consent to us collecting, maintaining, using and disclosing personal information about you in accordance with your reasonable expectations, any forms or other documents which you may sign and this policy. That information can be provided by you or another person. Similar requirements apply if it is proposed that you guarantee another person's obligations to us.

What information do we hold and how do we generally collect it?

If you are a client we collect information about you to provide you with the product or service you have requested. The type of information we collect and handle includes identity and contact details of you and your referees, information about your financial and business circumstances and history, and product or service preferences you may have.

If you are a client we collect personal information about you from you. On occasions, we obtain information about you from others. This allows us to provide the facility which you requested and to tailor our products and services to best suit your needs.

If you are anyone else, for example a guarantor or a customer of a client, we collect personal information about you from you or our client. On occasions we obtain information about you from others. The type of information we collect and handle includes identity and contact details of you

and your referees, and information about your financial and business circumstances and history (including debt payment history). We collect and handle the information to assess and enforce your guarantee or your obligations.

Generally we will only collect personal information about you from others if it is not reasonable or practical for us to collect it from you or our client or if you consent. For example, you may authorise us to collect information from a third party, such as credit reporting agencies. We may also collect information about you from other members of the Scottish Pacific Benchmark Group or from publicly available sources such as company registers.

How does the Scottish Pacific Benchmark Group use your personal information?

Our use and disclosure of information about you is dictated by the product or service you or our client takes up. We will not use or disclose the information for a purpose unrelated to this or outside your reasonable expectations unless we have your agreement or need to meet a legal obligation.

All information sought is required for our business purposes, which are detailed generally in this privacy policy and more specifically in any form or other documents which you may sign.

To provide our products and services in the most cost effective and efficient way, we may decide to utilise the services of others. For example, we may use a mailing house to send monthly statements. If this requires us to share information, we will require those persons to respect your right of privacy.

Your personal information may also be used by us or other members of the Scottish Pacific Benchmark Group to help assess your total relationship and product holding within the Scottish Pacific Benchmark Group, analyse products and services, evaluate your needs and develop new products.

Unless you inform us or have previously told us not to, we may also provide access to your personal information to members of the Scottish Pacific Benchmark Group so that they can inform you of products and services offered by any member of the Scottish Pacific Benchmark Group or preferred organisations which may be of interest or value to you.

How we protect the security of your information

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

We provide an appropriate level of security when you use *Open Account* or any of our other online products or services.

We have physical, electronic and procedural safeguards to protect your personal information which is 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 secured warehouses. Access to personal information stored electronically is restricted to staff whose job purpose requires access. We require all staff to maintain the confidentiality of personal information which we hold.

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. Ordinarily, we destroy the information seven years from the date you cease to have a liability to us.

Changes to our Privacy Policy

We may amend this privacy policy from time to time and will inform you by posting the amended policy on our websites. Please visit <http://www.spbgroup.com.au>.

What are your rights?

You need not give us any personal information about you or any other person which may be requested in our communications with you, except where you have agreed to do so in a document which you sign. 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.

Information about our Products and Services

If you do not want the benefit of receiving information, special offers or exclusive opportunities about products and services (which may be supplied by us or any other member of the Scottish Pacific Benchmark Group or preferred suppliers) which we think may be of interest or value to you, then please tell us.

Access to your personal information

As required by National Privacy Principle 5.2 we will, on request, take reasonable steps to let you know generally what sort of personal information we hold, for what purpose, and how we collect, hold, use, and disclose that information. If you require this information please ask our Privacy Contact Officer for a "Privacy Information Sheet".

Under National Privacy Principle 6 you can request access to personal information we hold about you. Please ask our Privacy Contact Officer for a "Request for Access to Personal Information" form. We will reply to your request within fourteen days of our receipt of the properly completed form.

There is no fee for requesting access to your information, however we may charge you the reasonable cost of processing your request. In our reply you will be given an estimate of the cost. You can then determine whether you would like us to continue with the processing of your request. We will complete the processing of your request within a reasonable time, usually fourteen days for a straightforward request. More time may be needed, depending on the nature of the request.

Sometimes we are not required to provide you with access – for example, if the law says we can deny 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 personal information we hold about you is accurate, complete and up to date.

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 personal information, you may request that we attach a statement to that information noting that you consider it is not accurate, complete or up to date.

How you may contact us

If you have any questions or concerns about our policy or practices please contact us.

Our contact details are:

Person Responsible: Privacy Contact Officer

Telephone: (03) 9820 1222

E-mail: privacy@spbf.com.au

Mail: Privacy Contact Officer
Scottish Pacific Benchmark Group
GPO Box 9969
Melbourne VIC 3001

Scottish Pacific Benchmark Group

In this privacy policy, “we” or “us” means Scottish Pacific Business Finance Pty Ltd and Benchmark Debtor Finance Pty Ltd. “Scottish Pacific Benchmark Group” means Scottish Pacific Business Finance Pty Ltd, Benchmark Debtor Finance Pty Ltd and companies that are related to, or owned by, Scottish Pacific Business Finance Pty Ltd or Benchmark Debtor Finance Pty Ltd. Members of the Scottish Pacific Benchmark Group may change from time to time.

This privacy policy has been prepared to reflect the particular products of the Scottish Pacific Benchmark Group and accordingly the Scottish Pacific Benchmark Group’s general privacy policy statement in relation to us should be read subject to this statement. The Scottish Pacific Benchmark Group’s general privacy policy can be found at <http://www.spbgroup.com.au>.