

THE TRUST COMPANY GROUP PRIVACY POLICY

15 March 2011



**THE
TRUST
COMPANY**

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In accordance with our commitment to safeguard your privacy and the confidentiality of your personal information, we have adopted the corporate privacy policy set out below.

The Trust Company group consists of the companies listed in Schedule A of this policy.

Collection

The Trust Company group will only collect information that is necessary for what we do and use it in a way you would reasonably expect. To ensure that we provide you with the services and products that are the most suitable for your needs and objectives, we need information about you, about your plans for the future and your present financial commitments. In collecting and using this information, we are committed to protecting your privacy.

What personal information do we collect?

To properly assess the financial products for your needs and to provide the services we can offer you, we need to know specific information about you. We need to know who you are and what you do, the people who will benefit from your estate, the types of financial commitments that you have and the lifestyle that you seek to have on retirement. For some of our more specific services, we need to have details of your tax file number, your earnings and your medical records. The type of products or services you request us to provide dictates what personal information we need to collect.

How do we collect personal information?

We collect the information we need in person, in writing, by telephone, through our website and by other electronic communication channels. Much of the information we require will be provided by you in the forms you, your payroll office, accountant or your financial adviser give to us. We may need to ask you or others further questions to ensure we can provide the services and products most suited to your needs. We may collect this information through our staff and through our contracted agents and other service providers.

Wherever practicable, we will ask you for the information. However, we may need to contact others such as your accountant, employers, business associates, bankers, credit reference agencies and referees.

Where your health or the health of others is relevant to an insurance product, risk or your claim for a disability, we may need to contact your doctor and other health professionals and services.

Who will see or have access to your personal information?

Unless we are required to provide your personal information to others by law, by court order or to investigate suspected fraud or other unlawful activity, your information will only be seen or used by persons working in or for The Trust Company group. These people will include our customer service staff, sales agents, accountants, lawyers, financial planners and para planners, underwriters, risk assessors, claims managers, investigators, statisticians, reinsurers, advisers. Employees of other companies who provide benefits and services to you as part of the insurance you may have as part of your superannuation fund may also have access to your personal information.

Our information systems and files are kept secured from unauthorised access and our staff and contracted agents and service providers have been informed of the importance we place on protecting your privacy and their role in helping us to do this. Some information is kept for a number of years to comply with legal requirements. Any personal information that is no longer needed is destroyed.

Why do we need to collect this information?

We need this information to provide one or more of the following products or services: financial plan, tax returns, prepare your will and complete the relevant estate planning, to provide agency services including payment of your bills, determine the investment products and services that will meet your present and future financial needs and to receive and handle any enquiries or claims relating to your investments, your superannuation benefits and to manage your financial arrangements.

We will also use this information to send you details of other products and services that may be of interest to you. At any time, if you no longer wish to receive this additional marketing material let us know, and we will remove your details from our direct marketing database.

What if I want to check what personal information you hold about me?

Subject to any legal restrictions, we are happy to meet your request for access to the personal information we hold about you. There may be some cost to you in providing this information if your request is complex or requires detailed searching of our records. We try to ensure that all information we hold about you, that we collect, use or disclose is accurate, complete and up to date. You must promptly notify us if there are any changes to your personal information.

If you believe there are errors in our records about you, please let us know and we will be happy to investigate and correct any inaccuracies. In the unlikely event that we do not agree with you as to the need for a correction of your personal information, you may request a correction statement be associated with your information and we will take reasonable steps to do this. Our privacy policy has been formulated to appropriately address your privacy rights and obviate any need for you to make a complaint. However, you retain your right to make a complaint to the Office of the Privacy Commissioner.

Compliance with the Privacy Act

We are committed to ensuring to the best of our ability that we meet all of the requirements of the Privacy legislation in Australia and New Zealand. Due to the nature of our financial services, we are not able to offer financial planning, superannuation services or personal services to customers who wish to be anonymous or who do not provide us with sufficient information to enable us to properly assess the financial needs or objectives as required.

Further information

If you would like further information on our privacy policy or if you have any concerns over the privacy protection of the information you have given to us or that we have collected from others, please contact:

Australian clients:

The Privacy Officer
The Trust Company Limited
GPO Box 4270
Sydney NSW 2001
Australia

Telephone: (02) 8295 8100
Fax: (02) 8295 8656
Email: privacyofficer@thetrustcompany.com.au

New Zealand clients:

The Privacy Officer
The New Zealand Guardian Trust Company Limited
PO Box 1934
Auckland 1140
New Zealand

Telephone: 0800 87 87 82
Email: feedback@nzqt.co.nz

What if you are not satisfied with the response to your complaint?

If you are not satisfied with our response to your complaint, you can refer your complaint to the appropriate Privacy Commissioner.

Australian clients:

You can contact the Federal Privacy Commissioner as follows:

- By telephone: 1300 363 992
- In writing: Director of Complaints
Office of the Federal Privacy Commissioner
GPO Box 5218
Sydney NSW 2001

New Zealand clients:

You can contact the Privacy Commissioner:

- By telephone: 0800 803 909
- In writing: Level 13, WHK Tower
51-53 Shortland Street
Auckland 1140

Schedule A – The Trust Company group of companies

In this document, 'The Trust Company group' means:

- The Trust Company Limited
- The Trust Company (Australia) Limited
- The Trust Company (FCNL) Pty Limited
- The Trust Company (Legal Services) Limited
- The Trust Company (Nominees) Limited
- The Trust Company (PTAL) Limited
- The Trust Company (PTCCL) Limited
- The Trust Company (Real Estate) Pty Limited
- The Trust Company (RE Services) Limited
- The Trust Company (Superannuation) Limited
- The Trust Company (UTCCL) Limited
- The New Zealand Guardian Trust Company Limited