



PRIVACY POLICY

This statement sets out the policy of the Vecchio Property Group for the collection, storage, maintenance, access and use of personal information, as contemplated in the Federal Privacy Act 1988. The policy applies to all divisions and organisations in the Vecchio Property Group Group.

General information about privacy and the operation of the Privacy Act 1988 can be found at the Australian Federal Privacy Commissioner's website at www.privacy.gov.au.

COMPLIANCE WITH THE PRIVACY ACT

Vecchio Property Group is committed to complying with the Privacy Act 1988 and the National Privacy Principles introduced on 21 December 2001 by the Privacy Amendment (Private Sector) Act 2000. The National Privacy Principles are a regulative guide on the management of personal information in the private sector. The Principles have been formulated to protect information confidentiality and the privacy of individuals.

To enable Vecchio Property Group to deliver the best possible service to its clients, customers and security holders, hereinafter referred to as "customers", it is necessary for Vecchio Property Group to collect personal information (i.e. information or an opinion that can identify a person) about existing and potential customers. The type of personal information that is collected will be determined by the nature of the relationship between Vecchio Property Group and its potential or actual customers.

COLLECTION OF PERSONAL INFORMATION

At the time personal information is collected, Vecchio Property Group will take reasonable steps to inform its customers about the purpose for which the information is collected, customer rights to access the information and other matters contemplated in the National Privacy Principles.

Should Vecchio Property Group seek to disclose information to another organisation, reasonable steps will be taken to ensure the customer is aware of the organisation or the type of organisation to receive the information.

Generally, Vecchio Property Group will only collect personal information from its customers unless it is not reasonable or practical or the customer consents to the information being collected from a third party.

Vecchio Property Group will not actively seek to collect sensitive information (e.g. customer health information, ethnic origin, religious preference). If Vecchio Property Group does need to seek sensitive information it will do in accordance with the National Privacy Principles.

What type of Personal Information does Vecchio Property Group Collect?

Generally, Vecchio Property Group will collect the following information:

- Individual and Company data including, entity name, postal and email address, contact numbers;
- Profile related data such as home ownership, income bracket, age group, marital status, lifestyle interests.



- In relation to financial products issued by Vecchio Property Group, bank account details and tax file number details, and
- Information in relation to other people who come into contact with Vecchio Property Group.
- This is not an exhaustive list as Vecchio Property Group may be required to collect further information in fulfillment of its service to customers.
- Vecchio Property Group may collect personal information by way of electronic and hard copy enquiry forms and questionnaires, exhibition attendance, inbound and outbound telemarketing campaigns.

USE AND DISCLOSURE OF PERSONAL INFORMATION

Vecchio Property Group is committed not to use or disclose personal information that it has collected, other than in the manner contemplated within the National Privacy Principles. In particular, Vecchio Property Group's policy is not to use or disclose personal information other than for the purpose for which it was collected or any reasonable secondary purpose. It is Vecchio Property Group's policy to obtain its customers' consent before it uses information for a purpose or in a manner different to the purpose for which it was originally collected.

Depending on the circumstances, Vecchio Property Group may be under a legal obligation to disclose personal information to third parties, such as a law enforcement agency. Vecchio Property Group will endeavour to disclose this information in accordance with the National Privacy Principles.

In relation to financial products issued by Vecchio Property Group, Vecchio Property Group may disclose information obtained in the application form attached to the prospectus or product disclosure statement of the financial product to the advisor, financial services licensee or dealer listed on the application form.

VECCHIO PROPERTY GROUP'S MARKETING ACTIVITIES

It is important for Vecchio Property Group to maintain contact with its customers and potential customers. That contact may involve the sending of advertising material through the post or by email to existing and potential customers. In these circumstances, it is Vecchio Property Group's policy to comply with the stated purpose for which personal information was collected. Vecchio Property Group's existing and potential customers will always have the opportunity to decline to receive further marketing material. If Vecchio Property Group receives such a request Vecchio Property Group will update its records appropriately, within a reasonable time.

DISTRIBUTION OF PERSONAL INFORMATION

Vecchio Property Group employs a number of contractors and subcontractors in the course of its business activities. It is sometimes necessary for Vecchio Property Group to give its contractors and subcontractors access to personal information held about its customers in order to complete the service. In these circumstances, it is Vecchio Property Group's policy to require the contractors or subcontractors who receive from Vecchio Property Group personal information about customers to comply with Vecchio Property Group's privacy policy, which includes compliance with the National Privacy Principles.

Organisations or individuals outside Vecchio Property Group are required to respect customers' rights to privacy and also to use the information in accordance with Vecchio Property Group's purposes and directions.



It is Vecchio Property Group's policy not to sell personal information about existing or potential customers to any organisation.

SECURITY OF PERSONAL INFORMATION

Vecchio Property Group will take reasonable steps to protect personal information that it collects from misuse, loss, unauthorised access, modification or disclosure. Secure Servers are used to store customer information, which are protected in secure environments by passwords and security access IDs. Vecchio Property Group employees are required to maintain the confidentiality of any personal information collected.

Vecchio Property Group will take reasonable steps to destroy or permanently re-identify personal information if it is no longer needed for any purpose for which the information may be used or disclosed.

ACCESS TO AND CHANGING PERSONAL INFORMATION

Vecchio Property Group will, if requested to do so, give existing and potential customers copies of the personal information that Vecchio Property Group holds about them. Before such information is released, Vecchio Property Group will require reasonable proof of identity from the enquiring person. Any requests for copies of personal information should be directed to Vecchio Property Group's Privacy Officer.

If access to information is to be denied (e.g. if required by law), Vecchio Property Group will do so in accordance with the National Privacy Principles and also provide reasons for the denial.

If any existing or potential customer wishes to update or correct personal information held by Vecchio Property Group about them, Vecchio Property Group will do so on receipt of a written request addressed to Vecchio Property Group's Privacy Officer. This is in keeping with Vecchio Property Group policy to maintain accurate records.

VECCHIO PROPERTY GROUP'S WEBSITE

When Vecchio Property Group's web site is visited, the web site may send "cookies" to the visitors' computer. Cookies are used in transactions over the Internet for various reasons including the maintenance of security. Cookies can also be used to monitor the areas of a website that are visited. Visitors to Vecchio Property Group's web site who do not wish to receive cookies should select the appropriate settings in their web browser.

WHAT ARE YOUR RIGHTS?

Wherever it is lawful and practicable, customers have the option of not disclosing personal information, which may be requested, or identifying themselves when entering transactions with Vecchio Property Group. However, without that information, Vecchio Property Group may not be able to fulfill customer requests or provide an appropriate level of service.

Customers also have the right to obtain a copy of any personal information held by Vecchio Property Group. There are exceptions to this right in prescribed circumstances.



AMENDMENTS TO VECCHIO PROPERTY GROUP'S PRIVACY POLICY

This policy may be updated and amended from time to time, at Vecchio Property Group's discretion. The current version of Vecchio Property Group's Privacy Policy will be accessible at this web site.

CONTACTING VECCHIO PROPERTY GROUP PRIVACY OFFICER

All communications relating to privacy should be addressed to Vecchio Property Group's Privacy Officer:

Vecchio Property Group
Email: admin@vecchio.com.au

Customers are encouraged to contact Vecchio Property Group should any concerns in relation to their privacy arise. If Vecchio Property Group does not resolve a complaint to their satisfaction, customers also have the right to contact the Office of the Federal Privacy Commissioner:

Privacy Commissioner
GPO BOX 5218
Sydney NSW 2001
Privacy Hotline: 1300 363 992