

**MACARTHUR
COOK**

MCK Limited – International Real Estate Fund Manager

PRIVACY POLICY

May 2009

VERSION HISTORY – RECORD OF CHANGES

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1. Overview

At MacarthurCook the privacy of our clients is important to us. This policy describes the way that MacarthurCook collects, holds and discloses information about individuals with whom we deal. MacarthurCook is subject to the Privacy Act (1988) (Cth) (**‘the Privacy Act’**), including the National Privacy Principles (**‘NPPs’**). We may vary this policy from time to time.

2. What sort of information we collect and how

We only collect personal information that is necessary for us to maintain our business relationship with our clients. This may include such things as name, address, contact details, tax file number and date of birth. If the client does not provide this personal information we may not be able to provide them with the product or service they requested.

How we collect personal information will depend upon how the client interacts with us and any applicable law (eg *Anti-Money Laundering and Counter-Terrorism Financing Act (Cth) 2006*). We may collect it through application forms and telephone contact but will not source any information from third parties.

The provisions of the Privacy Act restrict the collection of sensitive personal information. MacarthurCook will not generally collect sensitive information unless required by law.

We collect statistical information on website activity, such as the number of users who visit, the date and time of visits, the number of pages viewed and how users navigate through the site. No attempts are made to identify anyone browsing our web site.

3. How we use client information

When we collect personal information, we will inform the client of the purposes for which it is collected. Primarily, this will be to provide them with the product or service they have requested and the administration of that product.

We may also use personal information to:

- inform them about other products offered by MacarthurCook, however, they can notify us at any time if they do not wish to receive this information;
- carry out our business that includes performing our administration and operations including: accounting, record keeping, archiving, system development and testing;
- develop new products;
- assist clients in their queries; and
- fulfill our legal requirements.

4. Disclosure of personal information

MacarthurCook will not disclose a client's personal information unless:

- we are obliged to do so by law;
- we have their express consent; or
- we must disclose their personal information to organisations that perform specific essential services for us, for example mailing. We limit this disclosure to the information they need to perform the service.

5. Quality of information

We maintain personal information by taking reasonable steps to make sure that the personal information collected, used and disclosed is accurate and up to date.

We ask our clients to notify us immediately when they change their contact details such as telephone number and address or if they feel the information we have about them is inaccurate.

6. Security of your personal information

We will use all reasonable steps and up to date techniques and processes, which meet current industry standards to protect personal information from misuse, loss and unauthorized access, modification and disclosure.

We will take reasonable steps to destroy personal information in a secure manner if it is no longer required by us and there are no legal obligations to retain the information.

7. Government identifiers

We do not use Tax File Numbers or any other government identifier for the purposes of identifying our clients with our products or services unless we are required by law to do so. For example, we may be required by law to disclose a Tax File Number to the Australian Tax Office.

8. Access to information

A client can access most of the personal information we hold about them and request corrections.

This right is subject to some exceptions. For example, a client may not be able to obtain access to personal information which:

- would reveal personal information about another person; or
- we are prevented by law from disclosing

A client can request access to their personal information by submitting a letter or by contacting MacarthurCook by telephone.

9. What if MacarthurCook has made a mistake

If a client believes that we have breached the policies outlined in this document, they can raise the matter with the Compliance Manager who will ensure that any issues are promptly resolved.