

PRIVACY POLICY – BENEFICIUM GROUP

General

Beneficium (Int) Pty Ltd, and all its subsidiaries and related companies (referred to in this document collectively as **we**, **our**, or **us**) recognise that your privacy is very important and we are committed to protecting the personal information we collect from you. The *Privacy Act 1988* (Cth) (**Privacy Act**), Australian Privacy Principles and registered privacy codes govern the way in which we must manage your personal information. This policy sets out how we, as members of the Beneficium group, collect, use, disclose and otherwise manage personal information about you.

Collection

Types of information collected

We may collect and hold personal information about you, that is, information that can identify you, and is relevant to providing you with services you are seeking. The kinds of information we typically collect include name, address, age, contact details (land line phone, mobile phone, fax, email), timeshare information, bank account details, employment information as well as electronic information from your use of our website (see further below). We endeavour at all times to collect personal information in a fair and lawful manner.

If you apply for products, services or credit from us, we may also collect and hold various information related to your assets and financial position, including credit information or credit eligibility information about you. Our separate Credit Reporting Policy sets out how we deal with that information. We will provide you with a copy of our Credit Reporting Policy (including the list of ‘notifiable matters’ required to be provided by law), directly as part of your application for any relevant products, services or credit.

Method of collection

Personal information will generally be collected directly from you through the use of any of our standard forms, over the internet, via email, or through a telephone conversation with you. We may collect personal information about you from any document or report in relation to an incident at any premises owned, managed or leased by us. We may also collect personal information about you from our third party service providers who assist us in operating our business (for instance, credit reporting bodies).

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

Purpose of collection

The personal information that we collect and hold about you depends on your interaction with us. Generally, we will collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and for the purposes of:

- communicating with you, either verbally, electronically or by post;
- providing products, services or credit to you or someone else you know;
- monitoring, auditing and evaluating our products and services;
- providing you with marketing information about other services that we, our related entities and other organisations that we have affiliations with, offer that may be of interest to you;
- facilitating our internal business operations (including accounting, administration, and security);
- informing about your pending membership expiry (where applicable);
- for billing and debt recovery functions;
- involving you in market research, gauging your satisfaction and seeking feedback regarding our relationship with you;
- developing, improving and marketing our products and services;
- insurance or medical purposes following an incident or accident;
- complying with any legal or regulatory requirements; and
- dealing with any complaints or enquiries.

Failure to provide information

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services or products you, or they, are seeking.

Our website

If you access our website, we may collect additional personal information about you in the form of your IP address and domain name. To allow our web server (computer) to identify and interact more effectively with your computer, we may use “cookies”. Cookies are small packets of information. When you use our website we send you a cookie with a unique identification number. Cookies do not identify you personally, but they may link back to a database record about you. We use cookies to monitor usage of our website and to create a personal record of when you visit our website and what pages you view so that we may serve you more effectively. You can accept or reject all cookies as you choose.

Our website may contain links to other sites. We are not responsible for the privacy practices or the content of linked web sites and linked websites are not subject to our privacy policies and procedures. We encourage you to read the privacy policies of any linked sites before disclosing your personal information.

Use and Disclosure

Generally, we only use or disclosure personal information about you for the purposes for which it was collected (as set out above). We may disclose personal information about you to:

- our related entities to facilitate our and their internal business processes;
- third party service providers, who assist us in operating our business (including credit reporting bodies (if relevant), professional advisors, mail houses, auditors, marketing bodies, customer service providers, data analysis providers, credit processing and debt recovery providers) and these service providers may not be required to comply with our privacy policy. However, we take reasonable steps to ensure that third party providers adhere to our privacy policy; and
- our related entities and other organisations with whom we have affiliations so that those organisations may provide you with information about services, products and various promotions

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where you would reasonably expect us to and the purpose is related to the purpose of collection). We will not sell or rent the personal information collected from you or about you to any third party.

Cross-Border Disclosures

In providing our services to you it may be necessary for us to disclose personal information to relevant overseas third party service providers, who may be based in or use infrastructure in New Zealand, the United Kingdom, the USA ,Egypt. and the Philippines

Direct Marketing

We may also send you direct marketing material. If it is not practicable to obtain your consent we will provide you with an option to not receive direct marketing material in each of our direct marketing campaigns/emails. You can opt out of receiving such information from us, by following the unsubscribe instructions located in the e-mails we may send you, or you may contact us via email contactus@classicholidays.com.au or via phone on 07 5595 7555.

Security

We store your personal information in different ways, including in paper and in electronic form. We take all reasonable measures to ensure that your personal information is stored safely to protect it from misuse,

unauthorised access, modification, or disclosure, including electronic and physical security measures. For example, we store personal information on computer systems with limited access, which are located in controlled and secure facilities. We also offer SSL encryption, the industry standard security measures for transactions made over the Internet.

Access and correction

You may access the personal information we hold about you, by making a written request at any time. We will respond to your request within a reasonable period. We may charge you a reasonable fee for providing access to your information (but not for making a request for access). Generally, we will make your personal information available to you within 14 days.

We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, and if we do, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons).

We will endeavour to keep your personal information accurate and up to date. You can assist us by advising us of any change to your details. If, upon receiving access to your personal information or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately. We will take reasonable steps to correct the information so that it is accurate, complete and up to date.

If we refuse to correct your personal information, we will provide you with a written notice that set out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and provide you with a statement regarding the mechanisms available to you to make a complaint.

Complaints and Feedback

If you wish to make a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, please contact us as set out below and we will take reasonable steps to investigate the complaint and respond to you. If you are not happy with our response, you may complain directly to the federal Information Commissioner.

If you have any queries or concerns about our privacy policy, or the way we handle your personal information, please contact our Privacy Officer at:

Telephone: 07 5595 7555

Fax: 07 5595 7500

By post: PO Box 384, Coolangatta, Queensland, 4225.

Email: privacyofficer@classicholidays.com.au

More Information

You can obtain more information about privacy in general at the Office of the Australian Information Commissioner's website (www.oaic.gov.au).