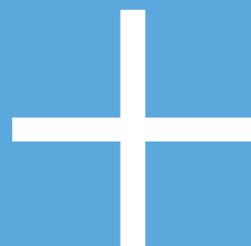


LCS Connect

Privacy Policy



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Document Purpose

This document describes measures undertaken by LCS Connect to comply with the Australian Privacy Principles Policy with respects to management of client data.

Contact

For any enquiries, contact LCS Connect at:

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1 Introduction

On 12 March 2014, the Australian Privacy Amendment (Enhancing Privacy Protection) Act 2012 came into effect. The new privacy legislation is driven by technological changes, impacting marketing and advertising practices in Australia; particularly around engagement of individuals in marketing.

Specifically, these reforms are outlined in the 13 Australian Privacy Principles (APP), which supersedes the National Privacy Principles and Information Privacy Principles outlined in the Privacy Act 1988.

As a vendor providing multi-channel marketing services for our clients, LCS Connect ensures that we comply with all aspects of the APP in line with the Australian Privacy Amendment (Enhancing Privacy Protection) Act 2012.

This document describes measures undertaken by LCS Connect to comply with the APP with respects to management of client data.

For any enquiries or complaints in relation to our compliance with the APP, please contact:

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This document shall be made readily available for our clients by request, and without cost.

2 Policy Compliance

On 12 March 2014, the Australian Privacy Amendment (Enhancing Privacy Protection) Act 2012 came into effect. The new privacy legislation is driven by technological changes, impacting marketing and advertising practices in Australia; particularly around engagement of individuals in marketing.

As general practice, LCS Connect complies with the following acts affecting provision of marketing services relating to handling of client data:

1. Privacy Act 1988
2. Spam Act 2003
3. Privacy Amendment Act 2012

This document specifically describes LCS Connect compliance with the APP.

Generally, personal information to be used for marketing purposes is provided by LCS Connect clients in electronic form. LCS Connect does not engage in data collection or communicate directly with end-consumers – certain APPs relating to data collection do not apply to LCS.

Refer a summary of the APP compliance effecting LCS Connect as below:

Activity	APP	Relevancy	Section
General	APP1 – Open and Transparent Management of Personal Data	Yes	3
	APP2 – Anonymity and Pseudonymity	Not Relevant	4
Data Collection	APP3 – Collection of Solicited Personal Data	Not Relevant	5
	APP4 – Dealing with Unsolicited Personal Data	Not Relevant	6
	APP5 – Notification of Collection of Personal Data	Not Relevant	7
Use of Personal Information	APP6 – Use or Disclosure of Personal Data	Yes	8
	APP7 – Direct Marketing	Yes	9
	APP8 – Cross-Border Disclosure of Personal Data	Yes	10
	APP9 – Adoption, Use or Disclosure of Government Identifiers	Not Relevant	11
Integrity	APP10 – Quality of Personal Data	Yes	12
	APP11 – Security of Personal Data	Yes	13
Access and Correction	APP12 – Access to Personal Data	Yes	14
	APP13 – Correction of Personal Data	Yes	15



3 Open and Transparent Management of Personal Data (APP1)

LCS Connect possesses a clear picture of our organisation's functions and activities – we track the journey of client data from the time we receive it until it is completely used for the intended marketing purpose, while having safeguards in place to ensure the security and privacy of the data.

LCS Connect conducts regular data audits showing the movement of data in, around and outside of the LCS Connect environment.

4 Anonymity and Pseudonymity (APP2)

LCS Connect does not directly engage with end-consumers – personal information to be used for marketing purposes is provided by LCS Connect clients, and is owned by the client.

Unless required by law, LCS Connect will maintain the anonymity of individuals in LCS Connect client supplied data.

5 Collection of Solicited Personal Data (APP3)

LCS Connect does not directly engage with end-consumers – personal information to be used for marketing purposes is provided by LCS Connect clients, and is owned by the client.

6 Dealing with Unsolicited Personal Data (APP4)

LCS Connect does not directly engage with end-consumers – personal information to be used for marketing purposes is provided by LCS Connect clients, and is owned by the client.

7 Notification of Collection of Personal Data (APP5)

LCS Connect does not directly engage with end-consumers – personal information to be used for marketing purposes is provided by LCS Connect clients, and is owned by the client.

8 Use or Disclosure of Personal Data (APP6)

LCS Connect only uses personal data for the primary purpose for which it was supplied by LCS Connect clients.

Personal information held on behalf of one LCS Connect client is never used or disclosed to another LCS Connect client or to a third party unless otherwise required by law.

LCS Connect does not use supplied personal data for any other purpose for which it was not intended for by the LCS Connect client.

9 Direct Marketing (APP7)

Personal information to be used for marketing purposes is provided by LCS Connect clients.

The obligation to manage the consent of the individuals to allow the use or disclosure of their personal data for marketing purposes is the responsibility of the LCS Connect client or their data provider. LCS Connect assumes that the LCS Connect client has managed this process.

For Electronic Direct Marketing (“eDM”) communications within the commercial category:

1. LCS Connect provides individuals with a simple means by which they can opt-out from receiving marketing communications; either through a link to the client’s Unsubscribe/ Subscription Preference facility or an Unsubscribe facility created by LCS Connect.
2. Where LCS Connect captures opt-out records; all opt-out records shall be supplied back to the client within 5 working days.



3. LCS Connect will ensure that the web form LCS Connect provides for opting-out will be active for at least 30 days.
4. LCS Connect shall ensure that there exists a statement within the marketing communication that makes individuals aware that they can make an opt-out request, as well as contact information for the LCS Connect client commissioning the marketing communication.
5. For eDM communications where LCS Connect clients have supplied the data to be used, LCS Connect assumes that the individual has not opted-out of receiving marketing communications.
6. For eDM communications where LCS Connect is to use previously supplied data, LCS Connect shall ensure that the individual has not opted-out of receiving marketing communications.

In circumstances where LCS Connect clients provide a suppression list or opt-out list to wash against; LCS Connect shall wash the supplied database against the suppression/opt-out list to ensure individuals will not receive any unwanted marketing communications.

LCS Connect utilises an enterprise technology platform to deploy eDM communications; the platform provider is a member of the following organisations and adheres to their standards for email deliverability:

1. Anti-Phishing Working Group (APWG)
2. Email Experience Council (eec)
3. Email Sender and Provider Coalition (ESPC)
4. Online Trust Alliance (OTA)

Where an individual requests that LCS Connect provides the source from which their personal information was obtained, LCS Connect shall immediately contact the LCS Connect client supplying the data to enable them to follow-up with the individual. LCS Connect shall provide the following information to the client to ensure that they are able to query their database within a prompt timeframe:

1. Individual Name
2. Method of Communication (Print, Email, SMS)
3. Communication Deployment Date/Time
4. Campaign
5. Date/Time Data was supplied to LCS

10 Cross-Border Disclosure of Personal Data (APP8)

Data used for purposes including data processing, laser printing, scanning, mailing or fulfilment and SMS marketing is not sent or disclosed to any parties overseas; to support these functions, LCS Connect utilises IT infrastructure based in Australia.

Data used for eDM communications and landing pages is sent to a technology platform in the United States through secure processes and infrastructure; all steps necessary are undertaken to ensure the privacy and confidentiality of data from receipt by LCS Connect to the intended recipient. These include the requirement for the platform to possess the following:

1. Subject to similar laws as Australia in order to protect and maintain the privacy of personal data; specifically, the "Safe Harbor" framework
2. Mechanisms that an individual can use to enforce the protection of the overseas laws

For eDM communications, LCS Connect shall inform LCS Connect clients that the use of an email gateway based overseas is being used for deployment and recommend a statement to this effect to be included in the copy of emails to be deployed by LCS.

LCS Connect will not knowingly transfer personal data outside of Australia unless with written assurances by the LCS Connect client that they are in compliance with the APP.

11 Adoption, Use or Disclosure of Government Identifiers (APP9)

LCS Connect does not collect any government related identifiers from individuals.

If government identifiers form part of LCS Connect client consumer information, the APP disclosure policy statement applies.



12 Quality of Personal Data (APP10)

LCS Connect takes reasonable steps to ensure that personal data supplied by LCS Connect clients to be used for marketing communications is accurate, up-to-date and complete through strict data processing processes. This includes processing and marketing fulfilment of the data within an agreed timeframe to ensure data does not expire (usually within five business days).

Output and reporting from the data processing by LCS Connect is communicated to LCS Connect clients to ensure transparency of data integrity.

13 Security of Personal Data (APP11)

LCS Connect takes reasonable steps to protect the personal data supplied by LCS Connect clients. We track the journey of client data from the time we receive it until it is completely used for the intended marketing purpose, while having safeguards in place to ensure the security and privacy of the data, including data encryption and SFTP.

LCS Connect utilises a technology platform to deploy EDM communications and landing pages. Data is transferred between the LCS Connect environment and the platform through secure processes and infrastructure. The platform is hosted in SSAE16, SOC II certified Data Centres and possesses appropriate Information Security policies to maintain high security standards.

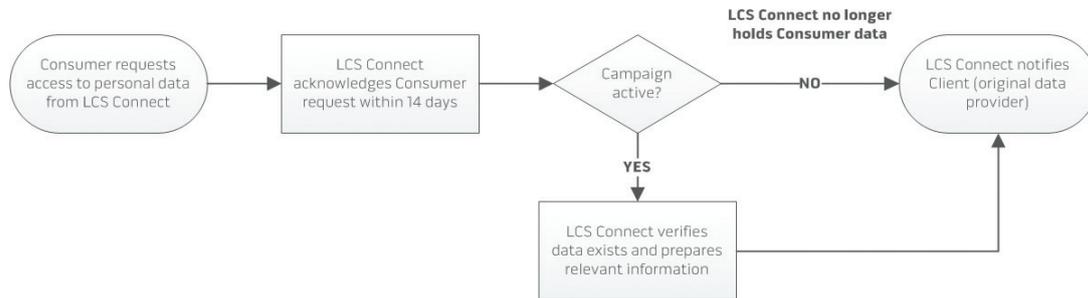
LCS Connect takes reasonable steps to ensure that personal data supplied by LCS Connect clients is protected from misuse, interference, loss, unauthorised access, modification or disclosure. These steps are enforced through organisational adherence to LCS Connect Information Security policies and technical measures put in place. All LCS Connect staff and sub-contractors are required to review this Privacy Policy and required to sign a Confidentiality Agreement prior to commencing employment.

Once a campaign expires; LCS Connect shall take reasonable steps to ensure that all personal data is destroyed or de-identified. The destruction of data should be performed within a practical timeframe (up to two months after campaign expiry).

14 Access to Personal Data (APP12)

In the event that an end-consumer contacts LCS Connect directly to request access to their personal data; we shall immediately communicate the request to the LCS Connect client (data provider), and inform the end-consumer that we have directed their request to the appropriate party.

Refer request for information flow below:



Request for Information Flow

In the event that an LCS Connect client (data provider) requests access to previously supplied data, LCS Connect shall comply if the following requirements are met:

1. The data was previously supplied to LCS Connect by the client for a marketing campaign,
2. The request for access is received in writing from the client; and
3. The data still remains within LCS Connect's database; as LCS Connect is required to destroy/de-identify individual records after the termination of a marketing campaign within a reasonable timeframe (up to two months after campaign expiry).

LCS Connect shall respond to a request for access to personal data within 14 working days. After responding, LCS Connect will verify the validity of the request and provide the information to the corresponding client within 14-30 working days.

For all queries and requests please contact:

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15 Correction of Personal Data (APP13)

LCS Connect does not directly engage with end-consumers – personal information to be used for marketing purposes is provided by LCS Connect clients.

For eDM communications within the commercial category, LCS Connect provides individuals with a simple means by which they can opt-out from receiving marketing communications; either through a link to the client Unsubscribe/Subscription Preference facility or an Unsubscribe facility created by LCS.

All opt-out records shall be supplied back to the client within 5 working days.

LCS Connect will ensure that the web form LCS Connect provides for opting-out will be active for at least 30 days.