



Privacy Statement

Aspen Group is committed to protecting your privacy and the confidentiality of any personal information that we collect from you.

While collecting and handling your personal information we abide by the National Privacy Principles ("NPPs") established under the Privacy Amendment (Private Sector) Act 2001. Information about the NPPs and your privacy rights can be found at the Privacy Commissioner's website at <http://www.privacy.gov.au/>.

Why do we collect personal information?

(a) If you are an Aspen investor or applicant

We ask you for personal information that is necessary to enable us to process your application and to administer and report to you on your investment(s). We are authorised to collect tax file numbers by the Income Tax Assessment Act 1936. It is not compulsory for you to provide your tax file number for our property investments, but if you don't taxation law requires us to deduct tax from your distributions at the highest marginal rate. We do require tax file numbers for our mortgage investments as, without them, the trustee may incur substantial withholding tax liabilities.

(b) If you are a tenant or applying for a tenancy

Aspen asks personal information that will enable it to assess your ability to pay the rent and in order to prepare the lease and any associated documentation and manage the tenancy.

(c) Other uses

We may use your contact details to let you know about other products we offer, or about developments within or affecting us. If you do not wish to receive such communications, you can let us know by e-mailing or telephoning us at the contact details below.

We will not use or disclose your personal information for any purpose other than as set out above, for a related purpose in circumstances where you would reasonably expect such use or disclosure, where you have consented to such use or disclosure or in circumstances otherwise authorised by the NPPs.

What personal information do we collect?

If you invest in our products, we collect information that enables us to provide you with your chosen investment product. This information may include your name, address, contact details, and may include, trust or fund name, bank account details if you wish to receive your income distributions by direct credit and tax file number.

We primarily collect your personal information from your application form which we receive directly from you or through your financial adviser. Occasionally, we collect information through telephone or e-mail enquiries about our products. Sometimes we receive notice from your financial adviser of changes to the personal information that we hold which we use to update that information.

In addition, Aspen collects name, address, contact details and financial information from proposed individual tenants of the properties it manages.

To whom do we disclose personal information?

Aspen may disclose some personal information of tenants to leasing agents and landlords as part of the administration of leases. Where properties or mortgages are held by a custodian as agent of Aspen in its trustee or responsible entity capacity, Aspen may need to disclose

information to the custodian for execution of security documents, leases and related documents.

If necessary to assist us in performing the duties outlined above, we will share personal information with related companies. All related companies are required to adhere to the NPPs and will protect your personal information in accordance with the NPPs.

Updating and accessing your personal information

If you become aware or believe at any time that information we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods set out below and provide us with evidence of the inaccuracy and if we agree that the information requires correcting we will take all reasonable steps to correct the information.

In most cases, you are entitled to access your personal information. We will try to respond to any request for access within four weeks, depending on the complexity of the information or the request. Under the NPPs, access can be denied in certain circumstances; we will give you our reasons for denying access if we do so. If the request is complex or time consuming, we may charge a fee for giving you access.

Cookies

Our web site uses cookies which allow us to identify your browser while you are using our site. Cookies allow us to track usage patterns so that we can measure the level of interest in various areas of our site. They do not enable us to identify you. Most web browsers are set up to accept cookies. You can re-set your browser to refuse all cookies or to receive a warning message with each cookie which you can then refuse by turning it off in your browser. Your internet service provider should be able to assist you to set your preferences. Unless you provide an e-mail address in the course of your visit to our web site, we cannot identify you.

The security of your personal information

We treat your personal information at all times as confidential. All paper files are stored in lockable cabinets or dedicated safe custody rooms which are locked out of hours. The office is manned at all times during office hours. Out of hours access to our premises is controlled by allowing only personnel with security passes to access the premises. All electronically held information is protected through the use of firewalls and access passwords on each computer. Data is backed up each evening and stored securely off site.

Complaints process

If you have a complaint about our treatment of your personal information, you should contact us by any of the methods set out below. Depending on the complexity of your complaint, we will consider and respond to it within 40 days. We will use our best endeavours to resolve any complaint to your satisfaction. However, if you are not satisfied with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

Contacting us about privacy

Address: Compliance Officer, Aspen Group, PO Box Y3442, East St Georges Terrace, Perth, WA 6832

Telephone: (08) 9220 8400

Facsimile: (08) 9220 8401

E-mail: homemail@aspengroup.com.au