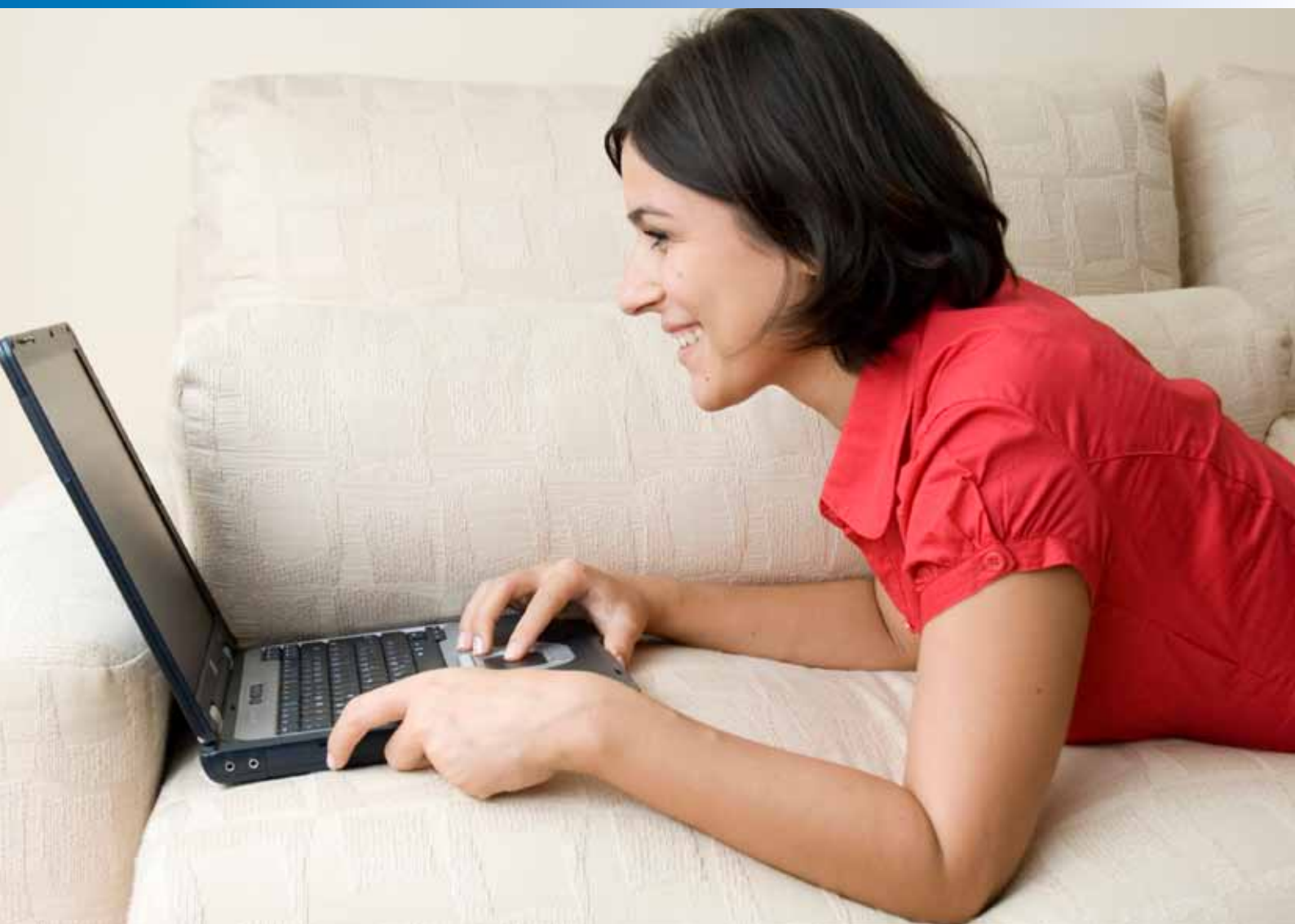


Privacy Policy

Version 4

October 2009



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Privacy Policy Version 4 (Oct 2009)

Statement

Navigator Australia Limited ABN 45 006 302 987, AFSL 236466 (Navigator), NULIS Nominees (Australia) Limited ABN 80 008 515 633, AFSL 236465 (NULIS), Norwich Union Life Australia Limited ABN 34 006 783 295, AFSL 241686 (NULAL) and their related entities together form the Aviva Australia group (also referred to as Aviva and Aviva Australia) and are ultimately owned by the National Australia Bank group (NAB). The Aviva name and logo are used under licence from the Aviva plc Group. At Aviva, we are committed to complying with the Privacy Act 1988. This Privacy Policy sets out how personal information we may hold about you is handled.

We will:

- only collect personal information that is necessary for us to perform our functions or activities;
- be lawful and fair in the way we collect personal information;
- take reasonable steps to ensure that you are informed of who we are and how we use the information;
- where practical collect your personal information directly from you – there may however be occasions when we need to source personal information about you from a third party;
- take reasonable steps to ensure that you are informed where we have collected the information from a third party;
- only disclose your personal information where it is consistent with your expectations or is required in the public interest;
- take reasonable steps to ensure that your personal information is recorded accurately and to correct any information which is established as incorrect;
- keep your personal information secure;
- be open about what kinds of information we hold;
- take steps to ensure your privacy is maintained where we supply your personal information to third parties; and
- only obtain, use and disclose sensitive information about you where it is necessary to provide you with a product or service and we have your consent, or where we are legally required to do so.

Scope

This Policy does not apply to our treatment of employee records. Employee records are exempt from the operation of the Privacy Act where Aviva is or has been your employer and where the act or practice is directly related to:

- a current or former employment relationship between you and Aviva; and
- your employee records held by Aviva

This exemption does not cover contractors, sub-contractors or prospective employees.

Collection, use and disclosure of information

We are committed to protecting the privacy of all personal information we obtain. Our aim is to safeguard the security and privacy of your personal information.

Collection of your personal information

A large amount of the personal information we collect about you will be collected directly from you or your financial adviser. For example when you complete an application form for one of our products or services, when you call us or when you write to us.

Types of information we may hold

The types of personal information that we may hold about you include:

- your name, age and contact details;
- account details such as: investment option used, contributions paid by you or any third party on your behalf and amounts transferred into and from your account;
- salary details and tax file number;
- personal information concerning the dependants you have nominated to receive death benefits; and
- personal information about your health provided to us via a personal statement and/or doctor's report, for insurance purposes.

Personal information that we may hold about individuals who are not our clients includes but is not limited to:

- information provided to us in job application forms and resumes, such as the applicant's name, age, contact details and employment history, and information recorded by us during the recruitment process;
- information provided to us about contractors and sub-contractors, either by themselves or their employer, and information recorded by us during the course of their relationship with us; and
- the names and contact details of advisers and other individuals who have a business relationship with us, and information recorded by us in order to establish and maintain that relationship.

The types of sensitive information that we may hold about you include medical records.

Use and disclosure

The main reason we collect your personal information is to enable us to perform our functions and activities. By maintaining a relationship with us, you consent to any personal information we collect about you being used and disclosed for this purpose, which includes but is not limited to use and disclosure as follows:

- for our internal operations including but not limited to accounting, risk management, record keeping, archiving, systems development and testing, staff training and compliance monitoring;
- for help in arrangements with other organisations in relation to the administration and use of the products and services we provide;
- to help us provide a service or product;
- to help us develop, identify and inform clients of enhancements to the products and services which they have asked us to provide (but not on the basis of any sensitive information we may hold);
- for research in relation to financial products and services;
- to consider your request for a service or product;
- where relevant, to enable your financial adviser and their staff to provide you with advice and ongoing service;
- in order to ensure that we comply with legislative and regulatory requirements, or for preventing or investigating crime or fraud;

- to regulatory bodies, government authorities and law enforcement bodies as required; and
- to give employers (where relevant) who make superannuation contributions on behalf of their employees into a product we provide, any necessary details of their total contributions for superannuation guarantee, taxation and fringe benefit reporting purposes.

We may also use and disclose personal information for the following additional purposes:

- for marketing of financial products and services;
- to enable advisers and their staff to contact members to make sure they understand their investment, and to offer to help them see how it fits into their overall financial plan (advisers and their staff will be bound by appropriate confidentiality obligations); and
- to help us develop, establish and administer arrangements with other organisations in relation to the administration and use of such services.

If you do not wish to consent to your personal information being used for these additional purposes, you can write to us at GPO Box 2567W, Melbourne, Victoria 3001.

We may disclose your personal information to other financial institutions and any person who carries out functions for us or to other organisations with whom we may have arrangements for the purpose of promoting or marketing our respective financial products and services including the following:

- a member's bank or other financial institutions, for any direct debits or credits;
- for members of a superannuation product, other entities for the purpose of rollover or transfer of benefits or for the facilitation of in specie transfers;
- entities we use for making regular statements and reports, newsletters and other correspondence;
- other entities we may use for outsourcing the administration of the financial products and/or services we provide to members;
- auditors, consultants, legal or accounting firms, reinsurers and financial services industry bodies;
- regulatory bodies, government authorities and law enforcement bodies;
- debt collection agencies;
- private investigators, in the event of a claim;

- third parties for the purpose of following up outstanding information in relation to a member's application;
- where relevant, a member's executor, administrator, trustee, guardian or attorney; and
- other parties to whom we are authorised or required by law to disclose personal information.

The commercial terms of these arrangements will where applicable, include appropriate confidentiality and privacy obligations.

We may also disclose your personal information to our related companies.

If you do not provide the personal information we request, or do not consent to its use and disclosure as described above, this may affect our ability to provide financial products and services to you.

Information we collect about individuals who are not clients will generally have very limited uses and disclosures. In these circumstances, our purpose for collecting information about you will depend on your relationship to us. Typically, these purposes include but are not limited to:

- the facilitation of business relationships, such as those formed with advisers and their staff; and
- recruitment.

In the case of advisers and their staff, personal information may be used and disclosed for the purposes applying to personal information about our clients, to the extent they are relevant to advisers and their staff.

We usually will only disclose information about contractors, sub-contractors and prospective employees to:

- other organisations to whom we outsource one or more of our functions or activities; or
- regulatory bodies, government authorities and law enforcement bodies as required.

Access and correction

You may request access to your personal information that we hold in relation to you. You can request access to your personal information by writing directly to us.

C/- The Privacy Officer
 Aviva Australia
 GPO Box 2567W, Melbourne, Victoria, 3001

Where it is established that your personal information is not accurate, complete or up-to-date, we will take all steps necessary to correct your personal information. We may charge you a fee for obtaining access to your personal information.

Your warranty

There are times when you may supply us with information about another person (eg when applying for insurance cover). When this occurs, you warrant that you have obtained their permission to give us the information and that you have provided that person with information about this Privacy Policy.

Data quality

We will take reasonable steps to make sure that personal information that we collect, use or disclose is accurate, complete and up to date. It is your responsibility to advise us of any changes to your personal details.

Data security

We employ appropriate technical security measures to protect your personal information against unauthorised access, modification and disclosure. Our security procedures provide that we may request proof of identification before we will release personal information to you.

When data containing personal information is no longer required to be maintained – that is for the purpose for which it was collected or for meeting legal requirements – we destroy it. We adhere to strict procedures around the destruction of records containing your personal information.

Website security

For Aviva's website security procedures, please refer to the Legal section of the aviva.com.au website.

Enquiries / Complaints process

If you have any enquiries or complaints regarding the handling of your personal information, you can contact us. We have procedures in place to handle complaints received. Replies to most enquiries can be made over the phone or by return phone call within a short period of time. Enquiries can generally be made by contacting our Client Services Team on the phone number contained within your product document or on one of the following numbers:

Clients **1300 4 28482**

Advisers **1300 1 28482**

More complex enquiries will generally be answered within 14 to 28 days. If you are not satisfied with the response to your enquiry, or we have not responded within 28 days of the request or it is a complaint, then a formal complaint should be lodged, stating that it is a complaint and not an enquiry. We may request that evidence be provided in support of the complaint. We will review the complaint and respond within 90 days of the receipt of the complaint.

All written enquiries and complaints should be directed to the Privacy Officer as outlined above.