Superannuation Client Portal Privacy & Security Policy



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Please read our website's Privacy & Security policy which is incorporated within the Terms of Use by reference.

VM Group will seek to ensure the highest level of security and privacy regarding the collection and use of customers' personal information as well as that of visitors to its website(s). VM Group takes your right to privacy very seriously.

We will not disclose information about you to anyone, except in instances where we have your written consent, or where we are compelled or allowed by law or policy to do so. If you decide to use our website(s) and/or our online services, you expressly authorise us to use that information in accordance with that policy.

Data Collection

VM Group uses a standard web tracking software to collect non-identifying information about our users including:

- · Date and time site was accessed
- · Place from which website is accessed
- Web browser used
- · IP Address

For the purposes of our online financial services we collect details such as the name, address, account information and e-mail address of our users.

Browser Cookies

The collection of non-identifying information assists VM Group in compiling statistics and determining the level of interest in our website(s). Your visits to the website(s) may therefore be recorded for analysis of the number of visitors to the site and general usage patterns. Some areas of the website(s) may use a "Cookie", temporarily stored in the visitor's computer or other device memory (RAM) to allow the web server to log the pages used within the site and to know if a visitor has previously visited the site.

This technology is only used to identify you as a legitimate user and to collect information about your computer or other access device to mitigate risk and prevent fraud.

We use a "Secure Cookie" which is only used via HTTPS, ensuring that the Cookie is always encrypted when transmitting from client to server.

We also use "Flash Cookies" (Local Shared Objects), to help ensure that your account security is not compromised, to detect suspicious behaviour and to help prevent fraud.

We encode our Cookies so that only VM Group can interpret the information which has been stored.

You are free to decline our Cookies if your browser or browser add-on permits same, however, it must be noted that doing so will interfere with the functions of the application or your ability to fully access certain web pages.

The 'Help' section of most browsers or browser add-ons usually provides instructions on blocking, deleting or disabling Cookies

Information Usage

- 1. We only collect personal information which is required to understand the financial needs of our customers and is relevant to the services we provide.
- 2. We utilize our customers' personal information to provide better services and products.
- 3. We may disclose your personal information within VM Group and/or its agents.
- 4 We will not disclose your personal information to any external organisation unless we have your written consent or are required by law.



- 5. From time to time we may be required to disclose your personal information to Governmental or judicial bodies or agencies or our regulators, but we will only do so under proper authority.
- VM Group endeavours to keep personal information on our records accurate and up-to-date.
 VM Group maintains strict security systems designed to prevent unauthorised access to your personal information by anyone, including our staff
- VM Group and all third parties with permitted access to your information are specifically required to observe our confidentiality obligations.

Data Security

- We are committed to providing proper data security. VM Group will strive at all times to ensure that your personal data will be protected against unauthorised or accidental access, processing or erasure. Security is our highest priority and VM Group has therefore implemented appropriate physical, electronic and managerial measures to safeguard and secure your personal data.
- Consistent with the industry standard for encryption over the Internet, the secure area of our website(s) supports the use of Secure Socket Layer (SSL) protocol and 128-encryption technology to protect data. When you provide sensitive information, it will be automatically converted into codes before being securely dispatched over the Internet.
- The web servers of VM Group are protected behind "firewalls" and our systems are monitored to prevent any unauthorised access.
- VM Group will comply with all statutory and regulatory requirements concerning the retention of personally identifiable information and will endeavour to take the practical steps to ensure that personal data will not be retained for longer than is necessary.

Security Assurance

The User and VM Group each play a vital role in protecting against online fraud. The User should exercise care with his/her account details including User ID and/or Password to ensure that the account details and security codes are not knowingly or accidentally shared or compromised and to ensure that the User does not provide or facilitate unauthorised use of that information. You must never share your User ID and/or password or allow access or use of it by others. VM Group endeavours to do its part in implementing high standards of security to protect your interests.

You should safeguard your unique User ID and Password by keeping it secret and confidential. Never write them down or share these details with anyone. VM Group employees will never ask you for your Password as we wish to ensure that you are the only person who knows that information. When choosing your unique User ID and Password, never create it using easily identifiable information such as your birthday, telephone number or a recognisable part of your name. If you think your User ID and/or password has been disclosed to a third party, is lost or stolen and unauthorised transactions may have been conducted, you are responsible to inform us immediately and have the security codes reset.

It is the User's responsibility to ensure that VM Group is given accurate and up-to-date personal information. The user must practise safe computing and periodically update software and operating systems, including security patches. The user is also responsible for conducting preventative maintenance using updated anti-virus software with the latest virus, Trojan and spyware signatures.

Use of Information and Materials on Our Website(s)

- The products and services referred to on our website(s) are offered only in jurisdictions where and when they may be lawfully offered by members of the VM Group. The materials on these pages are not intended for use by persons located in or resident in jurisdictions that restrict the distribution of such materials by us. Persons accessing these pages are required to inform themselves about and observe any relevant restrictions.
- These pages should not be regarded as an offer or solicitation to sell investments or make



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deposits in any jurisdiction to any person to whom it is unlawful to make such an invitation or solicitation in such jurisdiction.

The information contained in these pages is not intended to provide professional advice and should not be relied upon in that regard. Persons accessing these pages are advised to obtain appropriate professional advice when necessary.

Copyright & Trade Marks

- VM Group owns the trade marks, logos and service marks displayed on its website(s) and Users are prohibited from using same without the written permission of VM Group.
- The materials on VM Group's website(s) are protected by copyright and no part of such materials may be modified, reproduced, stored in a retrieval system, transmitted (in any form or by any means), copied, distributed, used for creating derivative works or used in any other way for commercial or public purposes without VM Group's prior written consent.

No Warranties

While VM Group has exercised due care in its preparation of the information and materials contained on its website(s), such information and materials are provided to you "as is" without any warranty of any kind whether express or implied. In particular, no warranty regarding non-infringement, security, accuracy, fitness for a particular purpose or freedom from computer virus is given in conjunction with such information and materials.

Linked Websites

VM Group is not responsible for the contents available on or the set-up of any other websites linked to this site. Access to and use of such other web sites is at the User's own risk and subject to any terms and conditions and privacy policies applicable to such access/use.

VM Group is not responsible or liable for activities on these other sites. However to protect the integrity of our website(s) please advise us of any concerns about these other sites.

E-mail

E-mail messages sent to VM Group over the Internet cannot be guaranteed to be completely secure. VM Group will not be responsible for any damages incurred by Users if they send a message to us, or if VM Group sends a message to them at their request, over the Internet. VM Group is not responsible in any manner for direct, indirect, special or consequential damages arising out of the use of any of its websites.

Video Banking

We reserve the right to record all video conferences with you.

For the purposes of Video Banking we may collect information you provide to us during the video conference (including but not limited to audio and video footages).

By using Video Banking you consent to the recording of the video conference.

Downloading

Please note that any software downloaded from any of VM Group's website(s) is at your own risk and VM Group neither assumes nor accepts liability for any loss, damage (whether direct or indirect) howsoever caused, as a result of any computer viruses, Trojan Horses, Worms, software bombs or similar items or processes arising from your use of any of our websites.



Use of Contents of Website

All information, documents, and materials, posted on our website(s) are the sole intellectual property of VM Group and may not be resold, republished, or copied, without the prior written consent of VM Group. In addition, all information, documents, and materials posted to this Website are subject to change without prior notification.

All products and services described in our website(s) are subject to the terms of the applicable account agreement which may be revised from time to time at the discretion of VM Group. Not all of the products and services described in our website(s) are available in all geographic areas and you may not be eligible for all the products and services offered or displayed. A website user's eligibility for particular service and products are subject to VM Group's approval which shall be final.

Terms and Conditions

Please read our Terms and Conditions outlining the use, limitations of liability and disclaimers in using our website(s).

Your Consent

By using any of VM Group's website(s) and VM Express Online Services you consent to the Privacy & Security Policy.

Review of Privacy & Security Policy

We may change this Privacy & Security Policy from time to time. Any changes will take effect once the revised Policy is available on our site and posted on the website(s). It is the user's responsibility to read and become acquainted with any modifications or additions to this Policy.

If there are any questions regarding this Privacy & Security Policy or you wish to update or change your personal information please contact us:

Contact Information



For more information, please contact: Tel: (876) 754-7265 Fax: (876) 754-8359 Pensions.info@myvmgroup.com

VM Pensions Management Limited

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