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29 May 2008

David Webb
Data Solutions Australia Pty Ltd
Level 5, 225 Miller Street
NORTH SYDNEY, NSW 2060


Dear David

Privacy Act 1988 (Cwlth) as amended by the Privacy Amendment (Private Sector) Act 2000

I refer to my discussions with you on 29 May 2008. I confirm that you and Steven Goldsmith of your office have explained to me and given me examples of how Data Solutions Australia Pty Ltd collects, uses and manages personal information.

From those discussions and the material presented to me, I am of the view that Data Solutions Australia Pty Ltd complies with its legal obligations under the Privacy Amendment (Private Sector) Act 2000 and the National Privacy Principles referred to therein.

In particular, I am satisfied that Data Solutions Australia Pty Ltd collects, uses and discloses private information in accordance with its legal obligations.

Yours faithfully
Leigh Adams Lawyers

Leigh Adams

1 June, 2008

Audit Statement

This document will provide information about Data Solutions Australia's data products, data related services and business processes.

Introduction

Data Solutions Australia (DSA) provides customer data integration software, data products and data related services to Australian companies to assist them to identify and communicate with their customers and prospective customers more effectively.

DSA provides a service designed to improve data quality for the customer databases of clients company, using DSA software and professional expertise, with work being conducted both at client locations and DSA offices. DSA also acts in an outsourcing capacity, managing clients company customer databases which are stored on or at DSA's data centre. In these lines of business, the information is owned and controlled by the client.

DSA develops and maintains MasterFiles, a database containing information on many of the households in Australia and New Zealand. The MasterFile is used by businesses of Australia and New Zealand in their marketing efforts, and contains data from various sources including public records and publicly available information such as telephone listings, demographic and lifestyle information available from commercial sources.

DSA operates a CD Rom application, **DSA DataWizard™**, which offers a subscription-based single-transaction search service for legitimate businesses wishing to locate individuals or businesses and all information is owned by or licensed to and controlled by DSA. Data is sent through our data portal, allowing clients' data files to be sent securely across the internet for automated data processing using DSA's technology and products. The data processing services provided via the DSA Data Portal include data cleansing, data integration, data enhancement such as the provision of telephone numbers matched to customer files, matching to industry suppression files and the production of data quality reports.

Management asserts that they have:

- Provided public access to their privacy policy and practices.
- Provided contract with data supplier and customers specifying responsibilities.
- Provided customers and clients with facilities to opt-out from third party use of information.
- Provided policies and procedures to comply with Australian Direct marketing Association Code of Practice
- Provided contact information for consumers to seek DSA's practices and privacy policies.
- Provided processes for consumers
- Provided a privacy officer whose job acts in specific responsibilities to privacy matters.
- Developed documented security policies and procedures.
- Developed procedures and processes for handling client and non-client data.
- Developed procedures and processes for internal and external security controls.
- DSA asserts that all residential phone numbers have been washed through the ACMA do not call register, and only privacy compliant records are supplied to clients
- DSA asserts that it has not taken, used any business or residential data other than data under terms and conditions specified under contract.

Products and Services Overview

Data Solutions has spent 15 years of investment and commitment into developing a leading Residential databases with over 10,000,000 Australian and New Zealand residential records and 800,000 Australian business records that are privacy compliant and updated or validated monthly.

Data Solutions – Australian Residential MasterFile

The Residential MasterFile is Australia's most comprehensive residential database available, providing information on income, age, property ownership, length of residence and life stage.

Data Solutions – Australian Business MasterFile

The Business MasterFile is Australia's most comprehensive business database available, providing information on company legal name, trading name, address, contact numbers and Australian New Zealand Standard Industry Classification (**ANZSIC**) (where available).

Data Solutions – New Zealand Residential MasterFile

The Residential MasterFile is New Zealand's most comprehensive residential database available, providing information on income, age, property ownership, length of residence and life stage.

Data Solutions - DSA DataWizard™

A data information management tool on a CD-Rom which requires Internet access to utilize Data Solutions Australian and New Zealand Residential and Business MasterFiles data.

The CD-Rom product (DSA DataWizard™) key features are:

- Access to Australian residential and business databases.
- Access to geoSmart™, enabling searches by socioeconomic status and family orientation.
- Access to Privacy compliant data.

Control Environment

Privacy

Data Solutions' privacy guarantee

Data Solutions Australia is committed to protecting individuals' personal information and will only collect, use or disclose individuals' personal information as permitted by the requirements of the National Privacy Principles in the Privacy Amendment (Private Sector) Act of 1988.

Data Solutions Australia publicly displays and provides their contact details for consumers to seek information on Data Solutions Australia's information practices and privacy policy.

Data Solutions Australia publishes and distributes responsibilities specifying compliance with Australian privacy and data protection laws for each of its customers.

Australian Communications and Media Authority (ACMA)

Data Solutions Australia loads its entire residential telephone database through the Do Not Call Register every 3 weeks, then providing an indemnity date. The indemnity date is one month after the wash date and the data can only be used for telemarketing up until this date.

Australian Direct Marketing Association (ADMA)

The Australian Direct Marketing Association (ADMA) List Warranty acts as an assurance that the data has been collected lawfully, is up to date and complies with all the requirements of the Privacy Act 1988, particularly name suppression. The Warranty also provides an assurance that lists swapped, rented or sold will be used in accordance with the Privacy Act 1988.

Data Solutions Australia purchased ADMA List Warranty numbers: **CLO020** and **BLO019**

Data Solutions Australia Privacy Internal Procedures

Data Solutions Australia The Company employs a Privacy Manager to log and answer any queries in relation to privacy. All enquiries are promptly handled and logged into our Privacy Database Register. Official Letters of Response are made in writing, posted to the recipient within 7 days. A copy of the recipients document(s) are filed for future reference.

Australian Direct Marketing Association publishes and provides a 'Do Not Contact List' of names which is sent to Data Solutions Australia on a 30 day period. Data Solutions Australia utilizes the ADMA 'Do Not Contact List' to update its databases on consumers which do not wish to be contacted.

Privacy website register

Data Solutions Australia publishes and provides an online website to consumers where they may contact or log privacy complaints to Data Solutions Australia. Privacy complaints logged onto our website are recorded into our Privacy Database register and handled by the Privacy Manager.

Privacy Database Register

- All data run through the ADMA do not contact list
- Data integrity and quality assurance
- Standard Response Letter on privacy complaints

Risk Assessment

Data Usage

Data Solutions collects personal information for the purpose of assisting clients to confirm owner / occupier details for residential properties and to verify and update personal information in client databases. We disclose personal information to our clients for those purposes and are committed to our data being complete and as accurate and up to date as possible.

Data Security

Data Solutions is committed to maintaining security over personal information. This includes:

- A secure IT environment, firewall protection.
- An electronically protected premises
- Restricted access to personal information
- Password file protection
- Encryption of data transfer
- Contractual confidentiality
- Provisions over personal information provided by clients
- Secure destruction of personal information that is no longer required
- Secure backup of all datasets to an offsite safe deposit.
- Secure separate dedicated server room

Sincerely,



David Webb

Director

Data Solutions Australia Pty Ltd