

PM-Partners group

Spam Policy

1. Customer Anti-Spam Statement

PM-Partners group is committed to permission-based email marketing practices and does not condone, encourage or tolerate any spam practices. We have established a Spam Policy to assure our customers are not subjected to Spam from our company.

Spam is "unsolicited commercial electronic messaging".

In accordance with the Australian Government Spam Act 2003, PM-Partners group will only send commercial electronic messages with the addressee's expressed or inferred consent to receive it. All commercial messages will have clear and accurate information about the PM-Partners group as the sender and will have a functional unsubscribe facility. All requests to unsubscribe will be dealt with promptly.

Emails which are normally anticipated, personal, relevant and/or associated with a pre-existing business or personal relationship are considered permission-based and are not Spam considered messages.

PM-Partners group only emails customers who have given us permission to send emails relating to their business, purchases, registration, enquiries and/or customer service. We will not intentionally email individuals or businesses that have not provided us with permission via expressed or inferred consent. We take all possible measures to ensure that our emails are sent to our customers who wish to receive them.

If you currently receive emails from PM-Partners group and you wish to stop them you can use the "unsubscribe link" listed in our marketing emails to Opt Out. Alternatively you can email us at marketing@pm-partners.com.au or write to PM-Partners group, Level 2, Bank of NSW House, 228 Pitt Street, Sydney, NSW 2000, and ask to be removed from our email list (or to contact us if you have any concerns or questions).

Customer Privacy Statement

PM-Partners group has created this privacy statement in order to demonstrate our commitment to customer privacy. Privacy is of great importance to us. We gather contact information such as your name, role, company name, company information, company address, phone number, e-mail address and billing information.

PM-Partners group uses the information that we collect to provide service for individuals and their organisations.

We may also use the information to contact customers to further discuss customer interest in our company, the service that we provide, and to send information regarding our company such as promotions and events. Customers are invited to receive an email newsletter by providing an email address. Customer email addresses and any personal customer information will not be distributed or shared with third parties. Customers can opt out of being contacted by us, or receiving such information from us, at any time by sending an email to marketing@pm-partners.com.au. Marketing emails also contain a functional Opt Out link.

Pete Swan
Director
PM-Partners group

2. Requirements of the Spam Act

The Spam Act makes it an offence to send unsolicited commercial electronic messages with an Australian link. 'Unsolicited' refers to messages that are sent without the consent of the recipient.

The Spam Act also requires that senders of commercial electronic messages include accurate identifying information about the organisation or person that authorised the sending of the message and a functional unsubscribe facility. All requests to unsubscribe must be actioned within five working days. In addition, the supply, acquisition or use of address-harvesting software and address-harvested lists is prohibited in connection with the sending of unsolicited commercial electronic messages with an Australian link.

It is important that you are fully aware of the requirements of the Spam Act when conducting e-marketing activities. The penalties that can be imposed under the Spam Act are substantial—up to \$220,000 per day for a first offence by a business entity.

To help you understand your obligations, the ACMA provides information at <http://www.acma.gov.au/Industry/Marketers/Anti-Spam> alternatively this link takes you to the Frequently Asked Questions <http://www.acma.gov.au/Citizen/Stay-protected/My-online-world/Spam/spam-faqs>

In Summary the Spam Act requires the following:

STEP 1 - CONSENT

Your commercial messages must only be sent when you have consent. This is express consent from the person you wish to contact – a direct indication that it is okay to send the message, or messages of that nature.

STEP 2 - IDENTIFY

Your commercial messages must always contain clear and accurate identification of who is responsible for sending the message and how they can be contacted. This will generally be the organisation that authorises the sending of the message.

STEP 3 - UNSUBSCRIBE

Your commercial messages should contain an unsubscribe facility, allowing people to indicate that commercial messages should not be sent to them in future. This could be as simple as a line in your message saying "If you wish to opt out from future messages, send a reply with the subject UNSUBSCRIBE". After a person indicates that they wish

3. PM-Partners group Spam Policy

PM-Partners group has a no tolerance spam policy - non conformance is regarded as gross misconduct. Please ensure you fully understand this policy and how it may apply to you. If you are unsure or have any questions please ask the Marketing Manager.

To ensure PM-Partners group newsletters, industry updates and marketing emails (herein known as "commercial messages") comply with the Australian Communications & Media Authority (ACMA) Spam Act we must ensure we follow these three important steps:

Step 1 – Consent:

PM-Partners group commercial messages must only be sent when we have received explicit personal consent from the person we have contacted – a direct indication that it is okay to send them a commercial message of that nature.

Step 2 – Identify:

PM-Partners group commercial messages should always contain clear and accurate identification of who is responsible for sending the message and how they can be contacted.

It is important our clients know who has contacted them and how they can get in touch by return. This will generally be PM-Partners group as the organisation that authorises the sending of the message rather than the name of the person who actually hit the “send” button.

Step 3 – Unsubscribe:

PM-Partners group commercial messages must always contain an unsubscribe or opt out facility, allowing people to indicate they no longer wish to receive such emails from PM-Partners group in the future.

After a client indicates they wish to unsubscribe, YOU have 5 working days to honour their request.

The procedure to unsubscribe our clients is:

- » Opt them out in Salesforce by checking the “Email Opt Out” tick box and ensure the ‘opt in’ is unchecked
- » If for any reason their details should not be in Salesforce or if they request that their details are removed – then completely delete all their details from Salesforce
- » Check and test to make sure you have opted them out correctly
- » Send them an email confirming they have been “Opted Out”
- » Put a record of this email and your action in Salesforce with the date of the request
- » If a client clicks unsubscribe they are automatically removed from our mailing list in Campaign Monitor (Marketing EDM system)
- » Monthly a report will be run in Salesforce as a cross check to ensure all unsubscribes are on the suppression list in Campaign Monitor.
- » Once a month all unsubscribed clients in Campaign Monitor will be manually updated in Salesforce.

4. Our Policy in Practice

Updated February 2015

Bulk Email (Marketing Broadcasts/EDMs):

- » Effective immediately: We do not send bulk email from Salesforce – No Exceptions
- » No broadcast emails are to be sent without email approval from the Marketing Manager
- » The Marketing Campaign Management system is used so that our opt in/opt out is maintained
- » When we want to send a bulk email, an ‘opt in’ list is pulled from Salesforce and Marketing will upload it to Campaign Monitor. Campaign Monitor maintains all ‘opt in – opt out’ records and it is governed by the ACMA.
- » We can access an opt out list after any broadcast so that we can update Salesforce manually, however this system has checks in place and will not allow an email to be sent to someone who has previously opted out. message to be sent
- » Marketing will follow the Unsubscribe or Opt Out Procedure as detailed below.

Website Newsletter and General Marketing information requests - Opt In:

- » Website opt in (request for our Newsletter and General Marketing information) goes directly to Salesforce and Campaign Monitor due to a plugin in “Beaufort 12” which was purchased to ensure Salesforce and Campaign Monitor are in sync.
- » PM-Partners group will access any new newsletter subscribers regularly via Salesforce and Campaign Monitor. All new subscribers receive an automated response from Salesforce with a link to previous editions of our newsletter.
- » Due to the integration app (Beaufort 12) all subscribers are automatically added to Campaign Monitor.

When we receive Info@pm-partners.com.au emails:

- » info@ emails are requests from customers for information. We provide this facility for a customer to conveniently and quickly ask for information without having to complete a form. This is where we obtain the majority of electronic requests and so it is clearly a service that is required by our customers. These requests come from our email signatures, marketing releases and our website.
- » The receipt of an info@ email is not an assumed Opt In. Permission must be obtained as in all other cases. This must be done during the follow up process by email or by phone.

Sales people & using Salesforce (Opt In Procedure):

- » Email addresses are not harvested under any circumstances (obtaining an email address without personal express permission with the intent of sending them marketing emails)
- » Any prospective customer must be spoken to in person and their permission obtained in person (unless the customer has already Opted In via the web or email)
- » If permission is obtained then the sales person can check 'OPT IN NEWSLETTER (PERSONAL CONSENT)' - in Salesforce
- » When you have obtained their permission an email must be sent from Salesforce confirming they have been "Opted In" stating the following (checking which apply):
This email confirms that you have been subscribed to receive:
 - » Our Newsletter & General Marketing Emails
 - » Follow up emails regarding your enquiry
- » If permission is not obtained then the email address may go in with their contact details but OPT IN must not be checked.
- » For example if they wish to stay in touch but not receive marketing emails or if we wish to put them in Salesforce because they work for an account that we may be targeting, in this case if we want to send them regular marketing emails then we must obtain express personal permission – No Exceptions
- » This is actually a great opportunity to have continued conversations with all our current and prospective clients (great sales practice & compliance)
- » Do not try to find a way around express personal consent – it is illegal and there isn't one
- » As an additional safeguard, if you are likely to send follow up emails from outlook and you are unsure if these would be deemed as a mutual exchange with a customer the following must go into your Outlook Signature - "If you wish to opt out from future messages, please send a reply with the subject UNSUBSCRIBE". If the customer sends this unsubscribe message you must action it immediately to ensure no further emails are sent by anyone.

Opt In buttons in Salesforce:

- » There is an "Opt In Newsletter (Personal Consent)" button in Salesforce that should be checked if a client has given permission for us to send our Newsletter and General Marketing information. If this Opt In button is not checked we assume that the customer does not wish to receive our Newsletter and General Marketing information.

Unsubscribe or Opt Out Procedure:

- » Receive request to Opt Out or Unsubscribe
- » Opt them out in Salesforce by checking the "Email Opt Out" box. And Uncheck the "Opt In" box,
- » If for any reason they request that their details are removed – then completely delete all details from Salesforce (while noting their email address which is required for step 5 below).
- » Check and test to make sure you have opted them out correctly
- » Send them an email from Salesforce confirming they have been "Opted Out" stating the following (checking which apply):

This email confirms that you have been Unsubscribed from receiving:

- » Our Newsletter & General Marketing Emails
- » Follow up emails regarding your enquiry

- » CC client owner/sales person to enable them to action if appropriate
- » Put a record of this email and your action in Salesforce with the date of the request
- » The majority of unsubscribe or opt out emails are sent to the marketing@pm-partners.com.au email address and will be actioned by Marketing.

Unsubscribe or Opt Out function in approved Salesforce templates

The general enquiry template contains 3 levels of opt out:

- » Please do not send me any further follow up emails
- » Please do not send me general marketing emails, newsletters and updates
- » Please do not send me any further follow up emails OR general marketing emails, newsletters and updates

A separate link is contained within the template for each of these 3 options with a different subject line for each email to specify which area the client has elected to opt out so Salesforce can be accurately updated.

Sales follow up:

- » When a sales person is responding to an enquiry the first step will be to call the prospect and then normally follow this up with an email
- » Repeated follow up emails can be SPAM – the act makes no reference to bulk emails - so the same rules apply, however they are much easier to follow and maintain
- » Only approved marketing emails can be used when providing regular follow ups and reminders to enquiries such as course enquiries. These are located in the templates folder within Salesforce to ensure the email complies with ACMA's Spam Act. These emails must be sent from Salesforce.
- » All follow up emails of a regular nature must use an approved Salesforce template – the template will be specific to the course or enquiry and will contain the following:
 - » Please unsubscribe me from any further follow up emails of this nature
 - » Please unsubscribe me from your Newsletter and General Marketing information
 - » Please unsubscribe me from any further follow up emails and General Marketing information
- » As an additional safeguard, if you are likely to send follow up emails from outlook and you are unsure if these would be deemed as a mutual exchange with a customer the following must go into your Outlook Signature - "If you wish to opt out from future messages, please send a reply with the subject UNSUBSCRIBE". If the customer sends this unsubscribe message you must action it immediately to ensure no further emails are sent by anyone and copy this information by email to Marketing.

Newsletter and General Marketing information emails:

- » During the conversation with the prospect you may also want to see if we can send them our Newsletter and General Marketing information emails
- » The rule is simple you must obtain their express personal consent – 'can I put you on our database to receive our Newsletter and General Marketing information'. You can do this during a conversation or during an enquiry and then check OPT IN when you put their details in Salesforce – No Exceptions
- » You can send a new customer a link or a copy of previous marketing emails and newsletter's – anything is OK as long as you have their express personal consent
- » Important: Do not try to find a way around express personal consent or providing the customer with the opportunity to opt out – it is illegal and there isn't one

- » If in any doubt ask the Marketing Manager

The sales process:

The sales process consists of:

- » You make sure your prospect is likely to buy the services we offer and is interested by speaking to them
- » You speak to your prospect regularly and frequently, keep in regular verbal contact and follow up by email and create a strong relationship
- » You do not communicate with them only through email as this will only push them away, damage our brand and almost certainly contravene the act in some way regardless of how careful we are. Above all it's bad business practice

Accountability:

- » Pete Swan is responsible for Senior Management ownership of this policy
- » Chris Hills is responsible for compliance (regular compliance checks) of the Spam and Privacy Acts and is the company Spam and Privacy Officer
- » All sales, finance, operations, administration and HR staff are personally responsible for day to day compliance and ensuring the requirements of the Spam and Privacy Acts are met
- » All sales people: As an additional safeguard, if you are likely to send follow up emails from outlook and you are unsure if these would be deemed as a mutual exchange with a customer the following must go into your Outlook Signature - "If you wish to opt out from future messages, please send a reply with the subject UNSUBSCRIBE". If the customer sends this unsubscribe message you must action it immediately to ensure no further emails are sent by anyone and copy this information by email to the marketing coordinator.
- » The majority of unsubscribe or opt out emails are sent to the marketing@pm-partners.com.au email address and will be actioned by Marketing, who will be accountable to enable any unsubscribe requests to be acted upon within the 5 day time limit.
- » Sales Co-ordinator and/or the Salesforce Administrator, is also responsible to ensure members of the PM-Partners group Sales Team comply with this Spam Policy.
- » As previously mentioned ALL bulk emails are required to be sent via campaign monitor (Marketing EDM System). To arrange to have a bulk email sent out please follow this procedure:
 - » Obtain verbal or email approval from Marketing
 - » Once approval has been obtained please put together a list of email addresses generated out of Salesforce. The email addresses on this list MUST be OPTED IN to receive email communications from PM-Partners.
 - » Forward your list and your email message to Marketing who will create and schedule the campaign in Campaign Monitor.
- » The Salesforce administrator is responsible for system administration, compliance and training. All questions, enquiries, complaints or breaches of this Spam policy should be directed to the Marketing Manager at marketing@pm-partners.com.au or 1300 70 13 14.

5. Variations

PM-Partners group reserves the right to vary, replace or terminate this policy from time to time.