

## PRIVACY POLICY

### COLLECTION OF INFORMATION

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We are committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Amendment (Enhancing Privacy Protection) Act, 2012 sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

As a financial planning organisation we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- Employment details and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- Details of your investment preferences and aversion or tolerance to risk;
- Information about your employment history, employment circumstances, family commitments, health issues and social security eligibility;
- Tax file numbers and Australian Business Numbers;

We are required, pursuant to the Corporations Act and certain regulations issued by the Australian Securities and Investments Commission and the Rules of Professional Conduct of the Financial Planning Association, of which this organisation is a member, to collect information about you for the purpose of providing you with financial planning services. If you do not provide us with the information requested by us, we may not be able to provide you with the services you require of us. We also collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

#### USE AND DISCLOSURE

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We will from time to time disclose information about you to authorised representatives of this firm and to other professionals such as insurance providers, superannuation trustees, product issuers and para-planning and client administration contractors in connection with the implementation of financial planning services. In the event we consider it necessary to use or disclose information about you for purposes other than those related to the provision of financial planning services or related purposes, we will seek your consent.

We take our obligations to protect your information seriously, this includes when we operate throughout Australia and overseas, as part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. We utilise contractors based in Singapore to undertake para-planning and client administration on our behalf. Our marketing databases may also be located offshore but the content is limited to basic contact details.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. You have a right to refuse us authorisation to collect information from a third party.



Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

We will not use or disclose Personal Information collected by us for any purpose other than:

- (a) The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- (b) Where you have consented to such disclosure; or
- (c) Where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

## **DOCUMENT STORAGE PRACTICES**

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Your personal information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off site storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

## WEBSITE

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Our website provides links to third party websites. The use of your information by these third party websites is not within our control and we suggest you check the Privacy Policy of the linked website should you require any additional information relating to their Privacy Policy.

Our website uses cookies to deliver content specific to Website visitors' interests and to improve the convenience and efficiency of its clients' experience when using its products and services. A cookie is a piece of data stored on the user's hard drive tied to statistical information about the user. Usage of a cookie is in no way linked to any personally identifiable information in our products and email messages. Visitors may choose to not accept cookies, but in doing so they may not be able to use some of the website's products and services. Some of our business partners, such as our Web analytics provider, also use cookies on our Website. These cookies are used to track visitor behavior and we have no access to or control over these cookies. This Privacy Policy covers the use of cookies by our website only and does not cover the use of cookies by any third parties.

## ACCESS TO YOUR INFORMATION

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You may at any time, by contacting us, request access to your personal information and we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

## ACCESS AND CORRECTION POLICIES AND PROCEDURES

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We will endeavour to ensure that, at all times, the personal information about you, which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information, which we hold about you is inaccurate, incomplete or out dated, you may contact us and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

## SPAM

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Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

We comply with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, we make sure that our practices are in accordance with the Australian Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

### Internal Procedure for dealing with complaints

The three key steps we follow:

- Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about the person who is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

### Comply with the law regarding viral messages

We ensure that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have consented to receiving Commercial Communications.

### Comply with the age sensitive content of commercial communication

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, we take reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event

## COMPLAINTS RESOLUTION

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We are committed to providing members, and other parties whose personal information we hold, a fair and responsible system for the handling of their complaints.

If at any time you have any complaints in relation to privacy, please contact our Privacy Officer. We will seek to address any concerns that you have through our complaints handling processes, but if you wish to take matters further you may refer your concerns to the Office of the Federal Privacy Commissioner.

## CONTACT US

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If you seek any further information about this Statement or our privacy policy generally, please contact us using the details below:

- Postal Address: 57 Adams Road, RED HILL WA 6056
- Telephone: (08) 9274 2888
- Facsimile: (08) 9274 3388