



Privacy Policy 2.3

We are committed to protecting the privacy and confidentiality of your personal information

Our Commitment

At AFSL Licensee we recognise that your privacy is very important. Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and Australian Privacy Principles (APPs) Privacy Amendment (Enhancing Privacy Protection) Act 2012 which replace the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000.

Our Privacy Policy sets out our commitment to the APPs and to protecting the privacy of the personal information that we hold. This Privacy Policy explains how we collect, use, disclose, and hold personal information and how to contact us if you have any queries about the personal information we hold about you. We require all our staff (including our Authorised Representatives) to adopt our Privacy Policy.

A summary of the APPs is available by contacting our office or at the Office of the Australian Information Commissioner (OAIC) website, www.oaic.gov.au.

What is Personal Information?

"Personal Information" is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples include an individual's name, address, contact number and email address. "Sensitive information" is a special category of personal information. Sensitive information includes health information and information about an individual's race or ethnic origin, philosophical beliefs, membership of a professional or trade association and membership of a trade union.

Anonymity and Pseudonymity

You have the right to not identify yourself or use a pseudonym when dealing with AFSL Licensee Pty Ltd.

However, in accordance with the Anti-money laundering and Know Your Client legislation set out in the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), if you elect to not identify yourself in respect of any financial services that we offer, we will not be able to assist you in those circumstances.

Collection

As a provider of financial services, 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. 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; Privacy Policy Page 3 of 7
- 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 and social security eligibility; and
- health information (required for some types of insurance).

We generally will only collect sensitive information (e.g. health information) about you with your consent, unless we are otherwise required or authorised by or under law to do so. If you provide us with personal information about another person, please make sure that you tell them about this Privacy Policy. We are required pursuant to the following legislation to collect sufficient information to correctly identify our clients and ensure appropriate personal financial product advice is provided to them:

- Corporations Act 2001;
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006;
- Taxation Administration Act 1953;
- Australian Securities and Investments Commission Act 2001;
- Superannuation Guarantee (Administration) Act 1992; and
- Superannuation (Unclaimed Money and lost members) Act 1999

Failure to provide requested personal information may impact the adequacy of advice given. We typically collect information through interviews, calls, emails, or online forms. Additional data may be obtained from third parties like accountants or solicitors. If we receive information not directly provided by you and it's not part of a Commonwealth record, we'll either delete or de-identify it, if lawful.

Collection of government identifiers

Tax File Numbers

This section, in addition to the rest of our Privacy Policy, addresses the collection and use of Tax File Numbers (TFNs). We are authorized to collect TFNs under relevant taxation, personal assistance, and superannuation laws, including the Income Tax Assessment Act 1936.

The handling of TFNs is regulated by applicable Tax Laws, the Privacy (Tax File Number) Rule, and the Australian Privacy Principles (APPs). TFNs are only collected for lawful purposes, such as reporting to the Australian Taxation Office or providing TFN information to you. It is not an offense to withhold your TFN.

The same principles apply to Medicare details and other government identifiers, which are only requested when necessary for the purposes outlined in this Privacy Policy or as required by government authorities.

Medicare and other identifiers

The above also applies to Medicare details and other government identifiers (not including TFNs). Corporate Authorised Representatives, their Authorised Representatives or employees of the firm will only request that this information be provided if it reasonably required for a purpose outlined in this Privacy Policy or as required by a government authority

Privacy is not an option, and it shouldn't be the price we accept for just getting on the internet

Privacy is not something that I'm merely entitled to, it's an absolute prerequisite.

Gary Kovacs

Silicon Valley
Technologist

Use & Disclosure

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including

- the preparation of your financial plan;
- the provision of financial planning advice to you;
- making securities and investment recommendations;
- reviewing your financial plan;
- reviewing securities and investment recommendations; and
- risk management

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

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the APPs authorise such use or disclosure under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

Direct Marketing

We may use the personal information collected from you so we can contact you with information about our products and services, special offers, promotions and events that may be of interest to you.

We may contact you by email, mail or telephone. If you wish to be removed contact via details at the end of this policy or using the unsubscribe facility in our communications.

Disclosures

Financial product providers

Your Personal may be disclosed to super fund trustees, insurance providers, and product Privacy Policy issuers for the purpose of putting your financial plan and the recommendations into effect

Agents and authorised representatives

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy.

Overseas recipients

Your personal information may be provided to overseas recipients in most cases the information will be disclosed in the course of our monitoring and supervision activities, these activities are requirements under Corporations Act 2001 but in some cases the disclosure may be for advice preparation and or administrative purposes. As at the date of this Privacy Policy, the location of any overseas recipients of personal information collected by AFSL Licensee Pty Ltd are located in the Philippines and the UK only.

Sale of Business

In the event of a sale of business, we may disclose personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made on a confidential basis and it will be a condition of that disclosure that no personal information will be mishandled or disclosed by the prospective buyer.

Document storage and Correction

Document storage and security

Your personal information is maintained securely and is generally held in your client file. Information may also be held in a computer database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

We may store your information in a cloud or other types of networked or electronic storage. We utilize a single sign on software with multifactor authentication and GEO Locking, all our Corporate Authorised Representatives and their Authorised Representatives and employees must use this software.

Access & correction

You may at any time, request access to your personal information by contacting your adviser (our Authorised Representative) or the Privacy Officer of your advising firm. Your adviser will (subject to the following exceptions) 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.

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;
- providing access would have an unreasonable impact on the privacy of others
- the request for access is frivolous or vexatious;
- the information 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; or
- 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.

In the event we refuse access to your personal information, we will provide you with an explanation for that refusal. 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 outdated, you may contact us using last page of this policy.



Information collected online

Our Corporate Authorised Representatives website may contain links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the APPs.

Cookies

Our web site may use cookies which allow us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

Changes to this policy

From time to time, it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our website.

Contact us

Privacy Complaints

This Privacy Policy and the legislation which governs it has been established to promote and protect your privacy rights. If you believe your personal information has been mishandled, there has been a breach of your privacy or you have any concerns about the manner in which we have collected your personal information, you may lodge a complaint directly with our Privacy Officer by contacting us on the details below.

Your complaint will be thoroughly investigated and responded to within 30 calendar days. We endeavour to resolve all complaints and encourage our clients to resolve complaints directly with our organisation.

However, if you are not satisfied with our response, you can contact us to escalate your concerns or lodge a complaint with the Australian Information Commissioner by visiting www.oaic.gov.au, calling 1300 363 992 or by emailing enquiries@oaic.gov.au

If you have any further enquiries regarding privacy issues or require further information relating to our Privacy Policy, please contact our Privacy Officer.



Attention to

AFSL Licensee Privacy Officer



Our e-mail

enquiries@afsllicensee.com.au



Telephone

+61 2 9125 203



Our website

www.afsllicensee.com.au



Hours of operation

9:00am–5:00pm AEST weekdays

Bringing compliance to Financial Advisers with
Technnolgy, Education, Experience



www.afslicensee.com.au



+61 2 9125 2030



enquiries@afslicensee.com.au