



# FinWealth Pty Ltd

## Privacy Policy

23 April, 2018

### Purpose

The purpose of this privacy policy is to describe how FinWealth and its officers, advisers and employees, collect, use and store personal and sensitive information in the process of providing you comprehensive, high quality, professional financial advice.

FinWealth collects and stores information in accordance with the Australian Privacy Principles (APP's) which were established under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and the *Privacy Act 1988*.

### Our Commitment

FinWealth takes our obligations under the Commonwealth Privacy Act (Privacy Act) very seriously.

The protection and safety of your personal information is of the utmost importance to our business.



## What is Personal Information?

Personal information generally means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a. whether the information or opinion is true or not; and
- b. whether the information or opinion is recorded in a material form or not.

## What is Sensitive Information?

Sensitive information includes a person's health information, genetic and certain biometric information. It also means certain personal information such as an individual's racial or ethnic origin, political opinion, religious beliefs, sexual orientation or practices, memberships or criminal record.

Sensitive information is generally only collected for insurance applications. Product providers require very specific information about your health and lifestyle to complete their assessment of the risk. This information will only be acquired where necessary.

**Where we refer to personal information in this Privacy Policy, unless the context refers otherwise, it is a reference to both personal and sensitive information.**

Any personal information we hold about you will be securely stored either in hard copy, or on our server. We back up this data on a weekly basis and copies are stored offsite.

## What we collect and what we use it for

Our ability to provide you with a comprehensive level of service requires us to collect personal information from you which we believe is necessary to deliver high quality outcomes. If we require sensitive personal information we will seek your express consent in the first instance.

The information we collect is likely to include:

- ∞ Name and contact details
- ∞ Date of birth and gender
- ∞ Details of your financial circumstances including, assets and liabilities, salary and other sources of income, expenditure, bank details, investments and superannuation, insurance cover in place, business structure and other entities
- ∞ Your occupation, employment details and employment history
- ∞ Health information relevant to insurance products
- ∞ Details of your estate planning requirements such as dependants and beneficiary information
- ∞ Any documentation required for identification purposes eg drivers licence and passport

We are obligated by law, particularly the Corporations Act 2001 and the Anti-Money Laundering and Counter Terrorism Financing Act 2006, to collect and hold information necessary to identify you.



The information we gather will be used by us to provide the services you have requested including:

- ∞ Investigation, preparation and provision of financial advice
- ∞ Placement of your instructions, including purchase, variation, and redemption of investments
- ∞ Placement of your instructions, including purchase, variation, and cancellation of insurance products
- ∞ Commencing and administering a Self-Managed Super Fund
- ∞ Providing assistance in your dealings with third parties such as Centrelink, Solicitors, and Accountants etc.
- ∞ Providing financing assistance such as helping to establish, terminate or vary a loan contract
- ∞ Providing specialist business advice and support
- ∞ Providing estate planning advice and support
- ∞ The provision of any other service which we are licensed to provide

## **If you choose not to provide personal information**

You are not obliged to give us all your personal information. However, FinWealth and your advisers require detailed, up to date and complete personal information to provide the services you require. Should you decide not to provide your personal information for this purpose we may not be able to provide you these services.

## **How we collect information**

We may collect your personal information by one of the following means:

- ∞ Face to face meetings with yourself and our advisers and/or staff.
- ∞ Telephone and/or skype meetings between yourself and our advisers
- ∞ Emails between yourself and our staff.
- ∞ Through our Financial Fact Find which you complete prior to becoming a client of ours.
- ∞ Occasionally we will receive information for the purpose of providing you with a service through a referral eg. Accountant or Lawyer.

Where we are required to collect personal information from third parties such as product providers, solicitors, accountants etc we will seek your permission prior to doing so unless you have knowingly provided that information to us or have authorised a third party to provide that information to us via their privacy controls.

We are required by law to verify your identity and that of entities which you control in accordance with Anti-Money Laundering and Counter Terrorism Financing legislation. In order to complete this verification we are

likely to search records held by regulatory bodies such as the Australian Securities and Investments Commission or the Australian Tax office.



## Use and Disclosure

We will not adopt, use or disclose any government related identifiers (eg: Tax File Numbers) unless it is necessary for us to provide our services to you, we need to liaise with a government department or is required under an Australian law or a court / tribunal order.

We will not use your personal information for any purpose other than:

- ∞ The reasons for which the information was provided or related reasons where you would reasonably expect the use or disclosure
- ∞ Where you have provided consent for the use or disclosure
- ∞ Where we are required or permitted to do so by law or for inspection to ensure compliance with mandatory professional standards
- ∞ Where the APP authorise use or disclosure eg. Where reasonably necessary to deal with unlawful activity or serious threats to life, health or safety.

We will seek consent from you if we have to engage with, or are required to send personal information to an overseas entity to either complete or fulfil our services to you.

FinWealth may use personal information gathered from you for secondary purposes which may include contacting you regarding other services that we believe may be of interest to you. In every instance you will have the option to “opt out” so you do not receive direct marketing from us.

## Data quality and protection

We will at all times take reasonable steps to ensure that the information we hold about you is accurate, up-to date and complete.

Your personal information will generally be held in your physical client file or on our computer database.

All physical documents are stored in lockable cabinets. Access to our premises is controlled and only authorised personnel are permitted entry.

Our computer systems are secured by anti-virus software and firewalls. Our network and computers are secured by passwords and all data is backed up regularly.

Where you cease to be a client of FinWealth we will retain your information for a period of 7 years (as required by law). At such time as your personal information is not required for any purpose we will arrange for it to be securely destroyed.



## Access to personal information

You may require access to the personal information we hold about you. Where possible, we will provide you information by providing copies, allowing you to inspect or providing an accurate summary of the information requested.

If we believe an exception applies under the Australian Privacy Policy and we refuse access of the information, we will provide written notice of the reasons for the refusal. In our response we will include information detailing how you can complain about our decision.

## Correction of personal information

If you believe the information we hold about you is not accurate, complete or no longer relevant you should let us know as soon as possible. We will take all reasonable steps to correct information where we are satisfied that the information held is inaccurate, incomplete or out-of-date. Please make requests in writing to your Adviser and Finwealth's address below.

## Complaints and further information

- ∞ If you require any further information about this policy or have a reason to complain about how we may be handling your personal information you can contact us, or the Privacy regulator directly – please see details below:-

Compliance Manager,  
FinWealth Pty Ltd  
Ground Floor,  
99 Coventry Street,  
South Melbourne. VIC. 3205  
Email: [info@finwealth.com.au](mailto:info@finwealth.com.au)  
BH: (03) 9690 8600

FinWealth will investigate your complaint and concerns and respond to you as quickly as possible and within 45 days.

- ∞ Privacy regulator – [www.oaic.gov.au](http://www.oaic.gov.au)

## Privacy Policy review

Our Privacy Policy will be reviewed will be reviewed on a regular basis, and at a minimum, annually.