

This document sets out our policy on the management of personal information which we have about individuals. Those individuals include clients to whom we may provide or may have provided financial advice.

1. Our privacy assurance to you

Your privacy is and will always be important to us. As our client we respect your right to be aware of who has information about you, what they are doing with it and why, and who else they are sharing it with. We have adopted a privacy compliance culture that cements this relationship with you. Its foundation is the *Privacy Act 1988* (as amended by the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*) and the *Privacy Regulation 2013*.

2. Overview

This privacy policy explains how we manage personal information. In particular it explains, in relation to that personal information:

- The kinds of personal information we collect and hold
- How we collect the personal information
- The purposes for which we collect, hold, use, and disclose the personal information
- How an individual may access personal information about the individual that we hold and seek the correction of that information
- How an individual may complain about a breach of the Australian privacy principles; and
- Whether we are likely to disclose the personal information to overseas recipients and the countries where those recipients are likely to be located.

3. The kinds of personal information we collect and hold

Personal information is information about an identified individual or an individual who is reasonably identified. We collect and hold personal information about individuals who are clients. This information includes identification information such as the individual's:

- Name, date of birth and marital status
- Contact details (including address, phone number and email address) and
- Employment details and history
- Financial details including information about the individual's financial needs and objectives, current financial circumstances including assets and liabilities, income, expenditure, insurance cover and superannuation
- Investment preferences and risk tolerance
- Family circumstances and social security eligibility; and
- Any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations, which is protected under the *Privacy Act 1988*. We will only collect sensitive information from you with your consent, except where otherwise permitted by law.

4. How we collect personal information

We collect personal information about individuals in a variety of ways. For example, we may obtain the information from the individual or from persons acting on the individual's behalf. When it is possible and practical, we will collect the information direct from the individual. When it is not practical or reasonable to do so we will collect the information from a third party. The third party could be an authorised representative (such as a broker, agent, or contractor), a related body, a referee, an employer, or a government body.

5. How we hold personal information

We take all reasonable steps to ensure that an individual's personal information which we hold is protected from misuse, interference, or loss and from unauthorised access, modification, or disclosure. We do this by having physical, electronic, and procedural safeguards which protect the personal information we hold. For example, the personal information is stored in secure office premises or in secure archiving facilities. Logins and passwords are required to access our electronic databases. Our staff are required to maintain the confidentiality of personal information and access to personal information is restricted to persons who require the information to perform their duties. Where practical, we only keep personal information for as long as is required to meet our legal requirements or internal needs.

6. The purposes for which we collect, hold, use, and disclose personal information

We collect, hold, use, and disclose personal information on individuals for purposes required or permitted by law and which are reasonably necessary for our business activities. Those purposes include:

- The purpose for which the personal information was initially collected (including sharing with related entities)
- A purpose related to the initial purpose of collection if that other purpose would be within the individual's reasonable expectations (or the individual's consent is first obtained)
- To deal with complaints
- To meet our legal and regulatory requirements (including verifying your identity under the *anti-money laundering and counter-terrorism financing act 2006*)
- To assist with a confidential alternative dispute resolution process.

We collect, hold, use, and disclose personal information so that we can manage and administer the services which we provide. To provide our services in the most cost effective and efficient way we may decide to utilise the services of others. For example, we may provide the personal information of individuals to legal advisors so that they can contact you to discuss putting in place legal documentation that we recommend in our financial advice, such as estate planning documentation. In this instance we will require those other persons to respect your right of privacy. Personal information may also be used or disclosed to tell an individual about products or services that may be of interest to that individual.

If the individual does not want his or her personal information used for these direct marketing purposes the individual can “opt-out” by sending an email to info@superadviceaustralia.com.au or by writing to us at:

Privacy Contact Officer

Name: Responsible Manager
Address: Superannuation Advice Australia
PO Box 400, Broadbeach Qld 4218

7. How an individual may access personal information

An individual may access personal information about the individual which we hold. The individual can obtain that access by contacting our privacy contact officer as follows:

Telephone: 1300 471 314
Email: info@superadviceaustralia.com.au
Mail: PO Box 400, Broadbeach Qld 4218

We will need to verify the individual’s identity before giving access. We will usually provide the requested personal information within 30 days of receiving the request. There is no charge to make a request, but we may levy an administration fee for providing access. If there is a reason why we do not make the requested personal information available, we will provide our reason in writing. Such circumstances may include:

- Access would create a serious threat to safety
- Providing access will have an unreasonable impact upon the privacy of other individuals
- Denying access is required or authorised by law
- The request is frivolous
- Legal proceedings are underway
- Negotiations may be prejudiced by such access
- Access would reveal a commercially sensitive decision-making process.

8. How an individual may seek the correction of personal information

If an individual considers that any personal information which we hold about the individual is incorrect in any way the individual may ask us to correct that personal information. To seek the correction, please contact our Privacy Contact Officer on the telephone number or at the email or postal address above. In certain situations, we may decide not to agree to a request to correct personal information. We will tell you in writing why we have not agreed to the correction request.

9. How an individual may complain and how we will deal with the complaint

We have an internal dispute resolution system that covers complaints. If an individual considers that we have failed to comply with Division 3 of Part IIIA of the *Privacy Act 1988* or the Australian Privacy Principles, he or she should contact our Privacy Contact Officer on the telephone number or at the email or postal address above. We will then follow our internal dispute resolution system. We will acknowledge the complaint within 24 hours (or one business day) of receiving it, or as soon as practicable. A decision will be made and advised within 30 days or a longer period as may be agreed with the individual. If the individual is not satisfied with the decision, he or she may make a complaint to the Office of the Australian Information Commissioner (the "OAIC").

The contact details for the OAIC are:

Telephone:	1300 363 992
Facsimile:	(02) 9284 9666
Website:	www.oaic.gov.au
Mail:	The Office of the Australian Information Commissioner GPO Box 5218 SYDNEY NSW 2001

10. Disclosure of personal information to overseas recipients

Some of the entities we share information with may be located in, or have operations in, other countries. This means that your information might end up stored or accessed in overseas countries, including India, Malaysia, Trinidad, and Tobago.

In the event we send your personal information outside Australia, we will take all reasonable steps to protect personal information against misuse or loss and to ensure compliance with the Privacy Act.

11. Definitions

In this privacy policy:

"Associate" means a person who is or may become an officer or employee of the client, the guarantor, or the debtor.

"Client" means a person (such as a company, sole trader, or partnership) to whom we have provided financial advice.

"we", "us" and "our" means Superannuation Advice Australia Pty Ltd ACN 634 086 374, a company incorporated in Australia; and

Any words which are defined in the *Privacy Act 1988* have the same meaning in this privacy policy.