

Privacy Policy

This document outlines Advisory Partners' policy on handling the personal information that we collect about you.

We are committed to protecting your privacy. When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with. At all times we will comply with the terms of this when handling your personal information. This policy answers the following questions about privacy at Advisory Partners:

Why do we need your personal information?

Understanding and meeting our customers' financial needs over the course of their lifetime is a central part of our business. To do this effectively, we need to collect certain personal information.

In this policy, personal information is any information that could identify you or be used to establish your identity.

We collect, hold, use and disclose customers' personal information so we can establish, manage and administer the products and services provided by us, and comply with legal and regulatory obligations. We may also use and disclose your information for purposes related to those mentioned above, such as:

- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Enhancing our customer service and product options (see the section 'Will my personal information be used for direct marketing?')
- Internal operations, such as record keeping, data analytics, auditing or training.

Will my personal information be used for direct marketing?

We do not use or disclose your personal information to keep you informed about the range of financial products and services offered by us, in the form of direct marketing. If you have concerns or queries in regards to what this means, you can contact us at any time (see the section 'How can you contact us about privacy?').

What happens if I do not provide information that has been requested?

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud. Where you are seeking financial advice, it may also affect our ability to properly analyse your personal circumstances.

What types of personal information do we collect?

We may ask for a range of personal information to assist us in providing you with relevant financial products and services. The information we request could include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, health information, employment details, domicile and citizenship status.

Will we collect sensitive information?

Sometimes we need to collect and use sensitive personal information such as health information when we consider applications for some insurance and banking products, when assessing a claim or for public liability incident reports. If we need to obtain, use and disclose this type of information, we will ask for your consent, except where disclosure is permitted by law.

How do we collect personal information?

Most of the personal information we collect will be directly from you. We gather this information either through application forms or other forms that you complete and submit to us (in writing and digitally), by recording the information you provide via phone calls and interviews. In some cases we might collect your personal information from external sources.

Examples of the people or organisations that may provide us with information are:

- employers, when as a new employee you join their reemployment, superannuation or insurance plan
- parents or guardians in respect of children
- persons authorised by you (such as lawyers or accountants)
- other credit providers
- public sources of information (such as telephone directories)
- third-party brokers (such as insurance and mortgage brokers)

We only collect your information from external sources if it is impractical to collect it directly from you, or when we are permitted to do so.

Can you remain anonymous or use a pseudonym when dealing with us?

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

How do we protect your personal information?

Whether your personal information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet or other methods, we take steps to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats.

We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

When we don't need your personal information anymore we will delete, destroy or de-identify it.

Who do we share personal information with?

From time to time we may share your personal information with other entities both within and outside of the Advisory Partners group. The entities that we might share your personal information with vary according to the product or service involved, but could include:

- other areas and organisations within the Advisory Partners group that provide financial and other services, for reasonable business purposes
- service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance or research services, some of whom may contact you on our behalf
- other insurers, including reinsurance companies, and credit providers
- courts, tribunals and other dispute resolution bodies in the course of a dispute
- credit reporting or reference agencies or insurance investigators
- employers contributing to or otherwise participating in our superannuation or insurance plans
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service)
- other financial services institutions – in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

Overseas Staff

We do now directly employ overseas staff to assist with administration for our team. The recruitment process of overseas staff is undertaken directly by a Partner of Advisors to ensure the recruitment of high quality of staff is achieved. All overseas staff are employed by Advisory Partners (not via an Agent) to ensure the level of control over staff is maintained by Advisory Partners. Like domestic staff, all overseas staff must provide satisfactory police checks.

Do we send personal information to overseas recipients?

Some of the entities that 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 Bahrain, China, countries within the European Union, Hong Kong, India, Japan, Malaysia, Mauritius, New Zealand, Philippines, Singapore, Switzerland, United Kingdom and United States. When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

How do we update your personal information?

We will update your personal information if you contact us.

In most cases you can update your personal information over the phone or via our website.

We may update your personal information if we believe the personal information we hold is incomplete or out of date, we could seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

How can you contact us about privacy?

You can call us on 03 5228 2200, send an email to fp@advisory.net.au, or write to us at Advisory Partners, PO Box 2111, GEELONG VIC 3220, to:

- seek more information about anything contained in this policy, or to request a printed copy of this policy
- update or correct your personal information
- opt out of receiving direct emails or communication
- ask about accessing or correcting the personal information we hold about you; or
- make a privacy related complaint.

How do you find out about your personal information we hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us (see how you can contact us about privacy). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time.

There are some situations where we are allowed to refuse or limit your access to information, for example when the information is commercially sensitive. If that happens, we'll write to you and let you know why.

There is no charge for making a request to access your personal information. However in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed at the start of this section.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. In most cases, we'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to the Advisory Partners Privacy Officer by email to fp@advisory.net.au or write to: The Advisory Partners Privacy Officer, PO Box 2111, GEELONG VIC 3220

Alternatively you can contact an external body:

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner – call 1300363992 or findthemonlineatoaic.gov.au
- If your complaint is about the products and services we provide you can contact Financial Ombudsman Service on 1800 367 287 or find them online at fos.org.au

What about privacy and the internet?

This statement is specific to the advisorypartners.net.au website.

What are interactive tools and how do we use them?

Our websites and mobile device applications provide you with many interactive tools designed to help you make an informed choice with certain financial and other decisions. Some of these tools include budget planners, debt reduction calculators, home loan comparison, key factsheets and superannuation calculators. We may collect personal information you enter when using the interactive tools on our website or through our applications.

What are cookies and how do we use them?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website.

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser.

You may not be able to access some parts of our websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Links to third party websites

Our website has links to external third party websites that may benefit the user.

External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to Advisory Partners' privacy standards and procedures.

Website analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from our websites, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website. This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our website. You cannot be identified personally from this information and no personal information is stored about you.

About this policy

This policy is effective as of 7 September 2017. We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy, or contact us for a printed copy. This policy incorporates the relevant provisions of the Privacy Act and the Australian Privacy Principles. This policy applies to the following entities within the Advisory Partners group operating in Australia.