

# Privacy Statement



Version 3 dated 1<sup>st</sup> November 2008

The following statement has been developed to provide further information regarding the Wealth & Security Planners ("WSP") Privacy Policy.

## 1. Collection of Information

- 1.1 As an Australian Financial Services Licensee 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:
  - (a) Employment details and employment history;
  - (b) Details of your financial needs and objectives;
  - (c) Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, superannuation, wills, estate plans and business or tax structures;
  - (d) Details of your investment preferences and aversion or tolerance to risk;
  - (e) Information about your employment history, employment circumstances, family commitments and social security eligibility;
  - (f) Tax File Numbers
- 1.2 If you are acquiring or have acquired a financial product or service from us, we are required pursuant to the Corporations Act and the Professional Conduct Rules of the Financial Planning Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, to manage and administer the product or service and to protect against fraud.
- 1.3 We will, if it is reasonable or practicable to do so, collect your personal information from you. In certain cases we collect your personal information from third parties. For example, publicly available sources of information or any other organisations identified in this section. Regardless, you have a right to refuse us authorisation to collect information from a third party.
- 1.4 Generally collection of your personal information will be effected in either face-to-face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.
- 1.5 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:
  - (a) The preparation of your financial plan;
  - (b) The provision of financial planning advice to you;
  - (c) Making securities and investment recommendations;
  - (d) Reviewing your financial plan;
  - (e) Reviewing securities and investment recommendations.
- 1.6 Our Web site uses cookies, which allows 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.

- 1.7 Our Web site contains links to other Web sites whose operators may or may not adhere to a privacy policy or be governed by the National Privacy Principles ("NPPs"). As WSP does not monitor, endorse or have any control over these web sites, care should be exercised when accessing them.
- 1.8 While it is not necessary to register your personal details to use our Web site, we do offer an information service, which will enable you to see if WSP can help you, send company literature or have an authorised representative contact you.
- 1.9 In the event you do register with us, we will collect personal information from you including your name, address, phone number and e-mail address. You may amend or update your registration details by contacting us, or if you have registered with us and decide, at any time, that you do not wish to receive any further information from us, you can email to contact us, in writing, requesting to be removed from our online registration database. Please allow 5 days for your request to be actioned.

## **2 Use and Disclosure of Information**

- 2.1 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 required or authorised under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body, eg reporting to AUSTRAC under the Anti-Money Laundering and Counter Terrorism Act 2006.
- 2.2 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.
- 2.3 We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, invitations to client seminars or special product promotions.
- 2.4 Upon receiving your request that you do not wish to receive (or wish to cease receiving) any direct marketing material from us, we will update your personal information in accordance with your request. Please allow 5 working days for your request to be actioned.
- 2.5 In accordance with the provisions of the Spam Act, we will not send you any unsolicited electronic commercial messages, as defined by the Act (eg emails, SMS, instant messages etc), unless you have given us your consent, whether expressed or implied, to receive them from us. If you have so consented, you should only forward our commercial messages to persons with whom you have a relationship.
- 2.6 Should you no longer wish to receive these electronic commercial messages, upon receipt of your request to "unsubscribe" or be removed, we will update your personal information in accordance with your request. Please allow 5 working days for your request to be actioned.
- 2.7 We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

- 2.8 In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our 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. You can be assured that your information will be maintained by an authorised representative in accordance with this policy. If you have any concerns in this regard, you should contact us.
- 2.9 WSP contracts the services of the WSP Administration Trust for the provision of all administrative services that will have access to your personal information. It is a condition of employment that the staff of WSP Administration Trust adopt and adhere to this Privacy Policy. All staff have signed an Agreement to this effect. You can be assured that your information will be maintained by any employee to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us.
- 2.10 We may disclose your personal information to external contractors for the following purposes:
- (a) Continuing development of our client database and workflow system
  - (b) To facilitate issuing, payment and recording of client invoices
  - (c) For auditing, compliance or other related purposes

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us.

- 2.11 In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such 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. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

### **3. Quality of Information Collected**

- 3.1 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 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.

### **4. Data Security**

- 4.1 Your personal information is generally held in your client file. Information will also be held in a computer database.
- 4.2 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. All paper files are stored in lockable cabinets, which are locked out of hours. All record movements off premises are recorded in a central register. Access to our premises is controlled by allowing only personnel with security passes to access the premises.
- 4.3 All computer-based information is protected through the use of access passwords on each computer and screen saver passwords. Data is backed up each evening and stored securely off site.
- 4.4 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.

## **5. Openness**

- 5.1 We believe that this Statement will address any potential concerns you may have about how personal information you provide to WSP is collected, held, used, corrected, disclosed and transferred. You can request more information on how we manage your personal by contacting WSP's Privacy Officer whose contact details are shown below.
- 5.2 If you wish to complain about any breach or potential breach of this privacy policy or the NPPs, please contact our Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

## **6. Access and Correction**

- 6.1 You may at any time, by contacting us, request access to your personal information and we 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, prior to providing access in accordance with this policy, require you to provide evidence of your identity.
- 6.2 We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.
- 6.3 We will not provide you with access to your personal information if:
- (a) Providing access would pose a serious threat to the life or health of a person;
  - (b) Providing access would have an unreasonable impact on the privacy of others;
  - (c) The request for access is frivolous or vexatious;
  - (d) The information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
  - (e) Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
  - (f) Providing access would be unlawful;
  - (g) Denying access is required or authorised by or under law;
  - (h) 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.
- 6.4 In the event we refuse you access to your personal information, we will provide you with an explanation, in writing, for that refusal.
- 6.5 If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

- 6.6 We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.
- 6.7 If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

## **7. Identifiers**

- 7.1 We do not use any identifiers issued by government agencies, eg Tax File Numbers, Licence Numbers etc, to identify your details whether in a hard copy or electronic file. An internal process, which we control, is in place to identify your details.
- 7.2 We will not disclose any identifier issued to you by any government agency unless:
- (a) The use or disclosure is necessary for us to fulfil our obligation to that agency; or
  - (b) Circumstances arise as outlined in clause 2.1 above.

## **8. Anonymity**

- 8.1 You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

## **9. Transborder Dataflow**

- 9.1 Because we operate throughout Australia and overseas, some of the uses and disclosures may occur outside of the State and/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

## **10. Sensitive Information**

- 10.1 Without your consent, we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record.
- 10.2 The above is subject to some exceptions including:
- (a) The collection is required by law; and
  - (b) When the information is necessary for the establishment, exercise or defence of a legal claim.

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