

WHO ARE WE?

'We', 'us' and 'our' refers to Australian Advisor Collective Pty Ltd ACN 626 468 166, Australian Financial Services Licence 511679 and our associated and related businesses.

AUSTRALIAN
ADVISOR
COLLECTIVE

OUR COMMITMENT TO PROTECT YOUR PRIVACY

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it for or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act and any other relevant law.

PERSONAL INFORMATION

When we refer to *personal information* we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you.

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation and any other information we may need to identify you.

Depending on the services or products we or other businesses are offering, we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses. If you apply for any insurance product through us we may also collect your health information. We will only collect health information from you with your consent.

WHY WE COLLECT YOUR PERSONAL INFORMATION

We collect personal information from you that is reasonably necessary for one or more of our functions or activities, including: in order to allow us to conduct our business functions, to meet any regulatory requirements which apply to our business, to promote and sell our services, including the promotion, distribution and investor relations support of third party investment product providers; to improve our services and our marketing; from time to time to market other products to you; and to conduct employee related activities.

If you can't or choose not to provide your Personal Information to us, we may not be able to undertake certain activities for you such as providing you with requested information, products or services.

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Where reasonable and practical we will collect your personal information directly from you. We may also collect your personal information when you visit our website, supply or receive products from and other people such as accountants and lawyers.

DO WE DISCLOSE YOUR PERSONAL INFORMATION?

Generally, we will only use your Personal Information for the purpose for which it was disclosed to us. However, we may use the Personal Information we collect about you for other business activities, which may include the following:

- to provide you with information or services you have requested, including about investment products or services provided by our associated businesses or third parties;
- to provide you with a client account and managing your account;
- to promote and market our services to you, including to communicate with you via SMS or email;
- to personalise and customise your experience on our Website;
- to companies that provide information and infrastructure systems to us;
- to anybody who represents you, such as lawyers and accountants;
- to anyone where you have provided us consent;
- to help us research the needs of our clients and their investors and for the purposes of improving existing products or services or creating new products or services;
- to provide you with ongoing information about us and our activities;
- to allow us to provide third party information and offers in which we believe you may be interested;
- to comply with our regulatory or other legal requirements such as disclosure under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth);
- for purposes related to the recruitment and employment of our personnel and providing internal services to our staff; or
- to your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia.

YOUR RIGHTS TO INFORMATION

You have the right to request access to the personal information that we hold about you and make a request for us to correct that personal information if needed. Please see the heading Access and correction to your personal information below.

DIRECT MARKETING

From time to time we may use your personal information to provide you with current information about offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time to decline to receive such information by e-mailing us on admin@advisorcollective.com.au, telephoning us on 1300 468 166 or by writing to us at PO Box 706, South Perth,

WA 6951. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

UPDATING YOUR PERSONAL INFORMATION

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

ACCESS AND CORRECTION TO YOUR PERSONAL INFORMATION

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you, if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information at the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal information within 30 days.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

USING GOVERNMENT IDENTIFIERS

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

BUSINESS WITHOUT IDENTIFYING YOU

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about current promotional offers.

SENSITIVE INFORMATION

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional associations or trade unions, sexual preferences, criminal record, or health.

HOW SAFE AND SECURE IS YOUR PERSONAL INFORMATION THAT WE HOLD?

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

EUROPEAN GENERAL DATA PROTECTION REGULATION (GDPR)

These regulations apply from the 28th May 2018. The GDPR applies to 'personal data'. This means "any information relating to an identified or identifiable natural person" (Article 4). This has similarities with the definition of 'personal information' in the Privacy Act, which is defined as 'information or an opinion about an identified individual, or an individual who is reasonably identifiable' (s 6(1) of the Privacy Act).

Under the GDPR, additional protections apply to the processing of 'special categories' of personal data, which includes personal data revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, or trade union membership, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation (Article 9). Additional protections also apply to similar categories of 'sensitive information in the Privacy Act (for example, APP 3.3 (collection of solicited personal information), APP 6.2(a) (use or disclosure of personal information) and APP 7.4 (direct marketing).

APP entities must take reasonable steps to implement practices, procedures and systems to ensure compliance with the APPs and to enable complaints: APP 1.2. Businesses are expected to appoint key roles and responsibilities for privacy management and to conduct private impact assessments for many new and updated projects.

We do not operate in this jurisdiction however are cognisant of the regulations if at a later date business management requires that we need to operate in that area.

NOTIFIABLE DATA BREACHES (NDB) AMENDMENT AUSTRALIA

The Notifiable Data Breaches (NDB) scheme under Part IIIC of the Privacy Act 1988 (Privacy Act) established requirements for entities in responding to data breaches. Entities have data breach notification obligations when a data breach is likely to result in serious harm to any individuals whose personal information is involved in the breach.

The passage of the Privacy Amendment (Notifiable Data Breaches) Act 2017 established the Notifiable Data Breaches (NDB) scheme in Australia. The NDB scheme applies to all agencies and organisations with existing personal information security obligations under the Australian Privacy Act 1988 (Privacy Act) from 22 February 2018.

The NDB scheme introduced an obligation to notify individuals whose personal information is involved in a data breach that is likely to result in serious harm. This notification must include recommendations about the steps individuals should take in response to the breach. The Australian Information Commissioner (Commissioner) must also be notified of eligible data breaches.

Agencies and organisations can lodge their statement about an eligible data breach to the Commissioner through the Notifiable Data Breach Statement – Form.

Agencies and organisations must be prepared to conduct a quick assessment of a suspected data breach to determine whether it is likely to result in serious harm, and as a result require notification.

We have a robust Information Technology policy and agreement with our Service Provider so that the systems are monitored on a 24/7 basis using current software and hardware.

COMPLAINTS

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act, you may contact our complaints officer on 1300 468 166 or by e-mailing our Compliance Team at compliance@advisorcollective.com.au

We will acknowledge your complaint within seven days. We will aim to provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may refer the complaint to the Office of the Australian Information Commissioner.

You can also lodge a complaint with our External Dispute Resolution Scheme, the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority,
GPO Box 3, Melbourne VIC 3000

FURTHER INFORMATION

You may request further information about the way we manage your personal information by contacting us.

CHANGE IN OUR PRIVACY POLICY

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices, consequently, we may change this privacy policy from time to time or as the need arises.

You may request this privacy policy in an alternative form.

This Privacy Policy came into existence on 3 April 2020 and is updated as required.

