

# Privacy Policy

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## Australian privacy principles

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The Advisory Firm Pty Ltd (TAF) abides by the Australian Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act, 2012.

TAF is subject to the ongoing 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. In addition, our ability to provide you with advice is dependent on us obtaining certain personal information about you.

On collecting information in the engagement process, TAF becomes obliged to provide certain disclosures to the individual whose information is being collected and becomes subject to certain obligations in respect of the subsequent use, disclosure, storage and management of that information.

We will not collect any personal information about you, except when you have knowingly provided information to us or authorized a third party to provide information to us.

Generally, collection of your personal information will be effected in either face to face interviews, over the telephone or via online means. From time to time additional and/or updated personal information may be collected through one or more of those methods.

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, which may include:

- The preparation of your financial advice;
- The provision of financial advice to you;
- Reviewing your financial advice;
- Other activities as directed by you.

The kinds of personal information required to be collected will depend upon the financial services and scope of personal financial advice provided, but may include the following:

- Date of birth, address and contact information;
- Copy of valid identification documents;
- Personal goals and objectives;
- Assets and liabilities;
- Income and expenses;
- Details of existing financial products, if held.

## Use and disclosure of information collected

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We will not use or disclose personal information collected by us for any purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonable expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the Australian Privacy Principles authorize use or disclosure, where required or authorized under law, in circumstances relating to public health and safety in relation to certain operations by or on behalf of an enforcement body.

We collect information about you for reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. We may also be required by other regulators (such as the Privacy Commissioner) to provide records held. Each regulator is empowered under specific legislation to enable enforcement and monitoring to occur; it would be under the relevant legislation that we would need to comply and provide the regulator with records held.

We may use the personal information collected to provide you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers to facilitate the recommendations made by us, and/or complete transaction requests.

To ensure that records are maintained as required, we will backup electronic records regularly in accordance to our ongoing AFSL and IT security obligations with special consideration to maintaining and adhering to the NDB Scheme. In addition, Product Providers such as those detailed above may also have similar data protection policies. Please refer to their Australian Privacy Principles Policy for further details.

We may disclose your personal information to another financial adviser during periods when this office is unmanned or closed so that you can be assured of receiving a continued service.

To ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our Authorized Representatives who will be your primary point of contact within the business. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy and adopt a culture around personal information security and the NDB Scheme. You can be assured that your information will be maintained by any agent or representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

We may disclose your personal information to external contractors for the following purposes:

- Strategy development
- Compliance monitoring

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 by any of the methods detailed below.

If we propose to sell our business, we may disclose your personal information to potential purchasers to facilitate 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. If a sale of our business is affected, we may transfer your personal information to the purchaser of the business. You will be advised of any such transfer.

## Data quality and security

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TAF will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up-to-date.

Your personal information is held in your client file on location. Information will also be held in our CRM.

We seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclosure. Your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in a secure location. If you cease to be a client of TAF, any personal information which we hold about you will be securely maintained for a period of seven years to comply with legislative and professional requirements, following which time the information will be destroyed.

## Access to information collected

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You may at any time request access to your personal information and we will provide you with access to that information. However, there are limited circumstances in which access to an individual's personal information will be allowed.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorized by or under law;
- 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.

If access to information is denied, we will provide reasons for the denial. All requests for access will be acknowledged within 14 days.

## Correction of information

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We will ensure that the personal information about you which we hold is up-to-date and accurate. Therefore, you are encouraged to contact us and advise of any change in your personal circumstances that may affect your dealings with TAF.

## Complaints

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TAF has in place facilities to properly consider and deal with any enquiries or complaints if you believe the privacy of your personal information has been compromised. TAF will respond to all complaints within seven days and aim to have them resolved within 45 days where possible. Where this is not possible, you will be contacted and advised when it is likely that your complaint will be resolved.

You are entitled to obtain access to the information which we hold about you as well as make a complaint by emailing the Compliance Manager at [info@smartsolutionsgroup.com.au](mailto:info@smartsolutionsgroup.com.au) or by writing to the Compliance Manager at The Advisory Firm, PO Box 586 Varsity Lakes Qld 4227.

It is our intention to resolve any complaint to your satisfaction, 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.