

Apt.

WEALTH PARTNERS

Privacy Policy



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Authorised for distribution by Apt Wealth Partners Pty Ltd
ABN 49 159 583 847 AFSL & ACL 436121

Apt.

WEALTH PARTNERS

SYDNEY
Level 28, 31 Market Street
Sydney NSW 2000
02 8262 4000

MELBOURNE
Level 8, 360 Collins Street
Melbourne VIC 3000
03 8779 5254

GEELONG
24 Moorabool Street
Geelong VIC 3220
03 5221 7557

NORTHERN BEACHES
Level 1, 2 Bungan Street
Mona Vale NSW 2103
1800 801 277

1 Overview

The collection of personal information about individuals by organisations is governed by the *Privacy Act 1988* (the Privacy Act) which contains the Australian Privacy Principles (APPs) for the collection, use, correction, disclosure and transfer of personal information. We may also be required or authorised to collect your personal information under the following Australian laws:

- Corporations Act 2001
- Anti-Money Laundering and Counter Terrorism Financing Act 2006
- Australian Securities and Investments Commission Act 2001

Protecting clients' privacy is very important to us. As part of our commitment to ensuring the safety of our clients' private and confidential information and as a mechanism to ensure our compliance with the Privacy Act and the Notifiable Data Breach Scheme provided for within the Act, we have established and implemented a Privacy Policy (the Policy).

Apt Wealth Partners is a business which is privately owned by financial planners who operate under our Australian Financial Services Licence.

1.1 Purpose

The Policy explains our approach with respect to the collection and management of your personal information.

The *Privacy Act 1988* requires us to handle your personal information in accordance with the APPs. Our approach to the APPs is set out below.

1.2 Scope

This Policy applies to Apt Wealth Partners Pty Ltd and all of its wholly-owned subsidiaries and related entities, together referred to in this Policy as 'Apt', 'us', 'our', or 'we'. These related entities may share information from time to time in order to facilitate providing financial services or products to you.

- Occupation
- Bank account and statement details
- Financial details (Income and Expenses, Assets and Liabilities, insurance cover, superannuation)
- Employment details and history
- Tax file number (TFN)

We will never use a government identifier in order to identify you.

This information is collected through application forms, the use of our online facilities or through ongoing communications with you.

We will only collect your personal information where reasonably necessary for one or more of our functions or activities. We will not collect sensitive information about you where this is expressly prohibited by law. Sensitive information includes information relating to:

- Race
- Political or religious beliefs
- Sexual orientation and sexual life
- Criminal convictions
- Membership of professional and trade associations or unions
- Information about your affiliation with certain organisations, such as professional associations.

If it is reasonable and practical we will only collect personal information about you except where you have knowingly provided that information to us in person, or provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant.

There are also specific circumstances in which we will ask for additional sensitive information such as:

- Personal health information from medical practitioners when you are making an insurance claim

2 Collection

What information do we collect?

We will only collect your personal information by lawful and fair means. We will collect and hold your personal information for the purposes of:

- Providing products and services to you
- Managing and administering the products and services
- Letting you know about our other products and services.

The type of information collected from you includes information that is necessary to provide financial advice and managing your financial adviser's relationship with you. We may ask you to provide the following personal information including but not limited to:

- Name
- Email address
- Residential and/or postal address
- Date of birth
- Contact details

- Income information from employers in instances where you are applying for additional insurance protection or salary continuance insurance
- Details of your dependants for the purposes of paying benefits in the event of your death.

We will seek your consent before collecting this kind of sensitive information unless the APPs otherwise permit.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information. In addition to obtaining personal information from you, whenever you acquire a new product or service from us, we will need to obtain certain documentary evidence from you as to your identity under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006*. Such evidence may include items such as a certified copy of your driver's licence, passport or birth certificate.

What if you don't give us the information we request?

You are not required to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- Prevent or delay the processing of your application, the implementation of your instructions or any insurance claim
- Affect your eligibility for insurance cover
- Prevent us from contacting you
- Impact on the taxation treatment of your account.

For example, when you become a member of a superannuation product, if you choose not to give us your TFN for passing on to the provider of the product, you may be subject to higher tax charges on your superannuation and the provider may not be able to accept personal contributions.

3 Use of information

How do we use the information that we collect from you?

We use personal information for the purposes for which it has been obtained. We collect personal information so that we are able to complete one or more of the following activities:

- Provide financial advice to you
- Assess your eligibility for finance
- Establish and manage your investments and accounts
- Implement your investment instructions
- Establish and maintain insurance protection
- Process contributions, transfer monies or pay benefits

- Report the investment performance of your account
- Keep you up-to-date on other products and services offered by us.

Personal information will also be used where you have consented to such use or where it is permitted under the APPs. For example, where you would reasonably expect that usage, or in permitted health situations, or in connection with certain operations by or on behalf of an enforcement body.

4 Disclosure

Who do we give information to?

We may provide your information to other related companies within the Apt Wealth Partners group or external parties. Where personal information is disclosed there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we often disclose your personal information are:

- Any organisations involved in providing, managing or administering our products or services such as actuaries, custodians, external dispute resolution services, insurers or investment managers
- Organisations who assist us with certain business functions such as external compliance and marketing consultants
- Your financial adviser
- Your employer (relates only to employer sponsored superannuation arrangements)
- Any fund (administrator or trustee) to which your superannuation benefit is to be transferred or rolled over
- Medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- Your personal representative, or any other person who may be entitled to receive your death benefit or any person contacted to assist us to process that benefit
- Any financial institution who holds an account for you
- Any professional advisers or successors to our business appointed by us
- Businesses that may have referred you to us (for example, your credit union)
- The Office of the Australian Information Commissioner (OAIC) as required by law.

Like other financial services providers, there are situations where we may also disclose your personal information where it is:

- Required by law (such as to the Australian Taxation Office)
- Authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- Required to assist in law enforcement (such as to a police force)
- Required to be reported to the Office of the Information Commissioner (IAIC) under the Notifiable Data Breach (NDB) Scheme.

We may also disclose your information if you give your consent.

5 Access and correction of information

Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case, we will inform you and explain the reasons why and how you may complain about our decision.

We will take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete, relevant and up-to-date. You have a right to ask us to correct any information we hold about you if you believe it is not accurate, complete, relevant or up-to-date.

If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

We maintain most records electronically and requests for information can be provided in a written or electronic format. If you receive a Statement of Advice via a video link, then we will provide you with a link with a set expiry date. You can request for the link to be made available at any time.

If you wish to access your personal information, you should contact us through our offices or by writing to the Privacy Officer. Details of how to contact the Privacy Officer are set out below.

Attention: Privacy Officer:
Apt Wealth Partners Pty Ltd
PO Box Q414
QVB Post Office NSW 1230
or via Contact Us on our website:
aptwealth.com.au/contact-us/

6 Protection of personal and sensitive information

How do we protect your information?

We have security systems, practices and procedures in place to safeguard your privacy. The people who handle your personal information for us have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

If you use the secure adviser, member or employer sections of our websites, we will verify your identity by your username and password. Once verified, you will then have access to secured content.

If we no longer need your personal information, we will destroy it or de-identify it.

Third party providers

Apt Wealth Partners engages third parties to provide services on behalf of the Australian Financial Services Licence.

Apt Wealth Partners uses software, systems, technology and products supplied by third parties (whether disclosed or not). This includes information and portfolio management systems (Xplan by IRESS), administration and paraplanning support (Virtual Business Partners) and other online information access systems.

Sending Information overseas

Your information may be disclosed overseas in order to provide you with our services. The current list of countries in which your personal information may be located includes:

- Administrative and paraplanning support - Philippines
- Sending or receiving superannuation benefits overseas: United Kingdom, Malta, New Zealand

Information is maintained on the servers of the third party providers noted above, which may be based in Australia and/or overseas. The use of this information is governed by the terms of our business agreement with them and complies with our requirements for the protection of your information under the *Privacy Act*.

For information on the Individual terms of IRESS and Virtual Business Partners, their current privacy policies are available at

<https://www.iress.com/resources/legal/privacy-policy/>

<https://www.virtualbusinesspartners.com.au/privacy-policy/>

Risks of using the internet

You should note that there are inherent security risks in transmitting information via email, online or through the internet. You should assess these potential risks when deciding how you want to transmit information, including through our website or client portal. If you do not wish to transmit information via email, online or through the

internet, please contact us for other ways in which you can provide this information to us.

Cookies

A 'cookie' is a small text file that may be placed on a computer by a web server. Our website may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

Most browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not.

If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

7 Data Breach Responses

We consider the safety and security of your personal information as important and take all reasonable steps to minimise unauthorised access, loss or misuse.

In the event that your personal information was to be accessed or compromised in any way we would follow our internal procedures in accordance with relevant legislation which may include notification to you and remediating any impact to you.

8 Marketing

We may from time to time, use your personal contact information (excluding sensitive information) for the purposes of direct marketing to you. Generally, we will only provide you with direct marketing if you have consented for us to do so, and you are able to opt out of receiving direct marketing from us at any time by contacting your adviser.

9 Complaints

If you have a concern about the privacy of your information, you may lodge a complaint with us by writing to the Privacy Officer. Refer to Privacy Officer contact details set out above.

You may also be able to complain to a recognised external dispute resolution scheme of which we are a member. If we have not been able to resolve your complaint to your satisfaction within 30 days, you can contact the Australian Financial Complaints Authority of which we are a member.

Australian Financial Complaints Authority (t: 1800 931 678, e: info@afca.org. au).

If your complaint is still not resolved, you may lodge a complaint with the Office of the Australian Information Commissioner.

You can contact the Office of the Australian Information Commissioner by:

- Calling the hotline on 1300 363 992
- Visiting the web site www.oaic.gov.au
- Submitting an online form: <https://forms.australia.gov.au/forms/oaic/privacy-complaint/>.

10 Review of this Policy

We review and update this policy from time to time in accordance with legislative changes and business requirements. A copy of this Privacy Policy is available on our website and also available on request.