

Privacy Policy

January 2020

This document outlines Fiduciary's policy on handling the personal information that we collect about individuals including customers, potential customers, business partners, and shareholders.

'Fiduciary', 'we', 'us' or 'our' refers to the Fiduciary Financial Services Pty Ltd (AFSL 247344). We provide financial advice.

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 policy when handling your personal information. This policy answers the following questions about privacy at Fiduciary.



FIDUCIARY

Financial advice, redefined.

Why do we need your personal information?

Protecting your personal information is important to us and we will only collect the information necessary to enable us to provide our advice services to you. We understand some information is more sensitive so we will be clear about why we are collecting it, what we intend to use it for and how we will protect it.

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 personal information so we can administer and deliver the advice 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 use and disclose your personal information to keep you informed about the advice services we offer.

You can opt out of receiving direct marketing information from 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 advice 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.

We are required to collect certain personal information about you, and to confirm that it is complete and accurate to meet our requirements as a licensed financial adviser. Unless this information is provided we are not willing to provide advice services to you.

What types of personal information do we collect?

We may ask for a range of personal information, limited to what we need, to assist us in providing you with relevant advice 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.

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 training our staff and financial advisers who handle personal information on the importance of maintaining the confidentiality of personal information and the privacy of individuals.

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

In the unlikely event of a data breach we have measures in place to manage and respond to data breaches, which includes the notification to impacted individuals and data protection authorities globally, where required.

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 Fiduciary. The entities that we might share your personal information with vary according to the advice service involved, but could include:

- other areas and organisations within the Fiduciary that provide financial and other services, for reasonable business purposes
- financial advisers, brokers and other parties authorised or accredited by Fiduciary
- 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
- courts, tribunals and other dispute resolution bodies in the course of a dispute
- employers contributing to or otherwise participating in our superannuation or insurance plans
- policy committees in our superannuation 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 Fiduciary le, 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.

Do we send personal information to overseas recipients?

All of your personal information shall remain within Australia. We shall not send your personal information to any overseas recipients.

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 or applications. 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 email:

privacy@fiduciaryadvice.com.au

or write to us at:

**The Privacy Officer, Fiduciary,
710 Collins Street, Melbourne VIC 3008**

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 marketing material
- 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 information that we hold about you using our Customer Portal, or 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 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. 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 Fiduciary Privacy Officer by email to: privacy@fiduciaryadvice.com.au or write to: **The Privacy Officer, Fiduciary, 710 Collins Street, Melbourne VIC 3008.**

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 1300 363 992 or find them online at oaic.gov.au.
- If your complaint is about the products and services we provide you can contact the Australian Financial Complaints Authority - call 1800 931 678, in writing to Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001 or online at info@afca.org.au. There may be a time limit for referring your complaint to AFCA. You should contact them or visit their website for more details.

What about privacy and the internet?

This statement is specific to the fiduciaryadvice.com.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 websites have 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 Fiduciary's 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 websites.

About this policy

This policy is effective as of 1 January 2020. 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 out website from time to time to view our current policy, or contact us for a printed copy.

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