

Strategy Financial Consulting Pty Ltd Privacy Policy

Overview

Protecting our clients' privacy is very important to us. We have established and implemented this Privacy Policy (the Policy) in order to ensure our compliance with the Privacy Act 1988 (Cth) (the Privacy Act).

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles (APPs), which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations in the private sector.

What information do we collect?

We collect and hold your personal information for the following purposes:

- providing advice, 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 we may collect from you may include:

- name
- email address
- residential and/or postal address
- date of birth
- telephone number
- occupation
- bank account details
- financial details
- employer
- tax file number (TFN)

This information may be collected in a number of ways.

We will not solicit any personal information about you unless you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. Third parties that we may need to collect information from include product issuers, employer, accountant or solicitor.

In some specific circumstances we will ask for your consent to provide sensitive information such as:

- personal health information
- income information from employers
- details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993* (Cth)

What if you do not give us the information we request?

You are not obligated 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 or claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact the taxation treatment of your account.

For example, we are required to ask for your TFN when you become a member of one of our superannuation products. If you choose to not give us your TFN, you may be subject to higher tax charges on your superannuation and we may not be able to accept personal contributions.

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

We use your personal information for the purpose for which it has been obtained. We collect your personal information so that we are able to act on your request, such as to:

- provide financial advice to you
- 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.

Who do we give your information to?

We may provide your information to other related companies within the Avalonfs Pty Ltd Group or external parties. Where personal information is disclosed, there are strict controls in place to ensure how information is held, used and disclosed.

The types of external organisations to which we may disclose your personal information include:

- organisations involved in providing, managing or administering products or services such as custodians, external dispute resolution services, insurers, investment managers, or mail houses
- your financial adviser
- your employer (relates only to employer sponsored superannuation arrangements)
- funds (administrators or trustees) to which your 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
- financial institutions that hold accounts for you
- professional advisers appointed by us
- businesses that may have referred you to us

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

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

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

Will my information be disclosed overseas?

We may disclose your personal information to our related companies within the Avalonfs Pty Ltd Group located in Australia. It is unlikely that we will disclose your personal information overseas. A few of our associates use offshore outsourcing services (the individual privacy policy of those entities lists any country where an overseas disclosure is likely). Any overseas disclosure does not affect our commitment to safeguarding personal information we collect and we will take reasonable steps to ensure overseas recipients comply with the terms of our Privacy Policy.

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

You may request access to the personal information we hold about you. However, we reserve the right to 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.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested.

If you wish to access or correct your personal information, you may contact us through our offices or by writing to the Privacy Officer, whose contact details are set out below.

Complaints

If you believe that we have breached the APPs by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out below.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner.

You can lodge a written complaint with the Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: www.oaic.gov.au
- Submitting a hard copy form which can be obtained at <https://forms.business.gov.au/aba/oaic/privacy-complaint-/>
- fax to 02 9284 9666
- email at enquiries@oaic.gov.au

How do we protect the security of your information?

We have security systems, practices and procedures in place to safeguard your privacy. We may use cloud storage or third party servers to store the personal information we hold about you. These services are subject to regular audit and the people who handle your personal information have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are 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 websites 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.

All 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.

How long do we retain your personal information?

We are required by law to retain certain records of information for varying lengths of time and, in certain circumstances, permanently. Where your information is not required to be retained under law, we will take reasonable steps to irrevocably destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

Updates to this Privacy Policy

Unless required earlier, this Privacy Policy is reviewed and updated annually. The most current version of the Privacy Policy can be obtained from our website.

How do you contact the Privacy Officer?

You can contact the Privacy Officer by:

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| Mail: | Privacy Officer Strategy Financial Consulting 22 The Mainsail PORT MACQUARIE NSW 2444 |
| Email: | info@happyretirement.info |
| Telephone | 1300 201 087 |