

Our Privacy Policy relates to how we address each of the Australian Privacy Principles (APPs) set out in the Privacy Act 1988

APP1 – open and transparent management of personal information

Our policy: We are committed to manage any personal information we collect from our clients in an open and transparent way.

We collect personal information from you and about you as part of our advisory role. We do this in a variety of ways, including asking you for data about you and asking others to provide data about you (e.g. a super fund you invest in).

Any personal information we hold about you will be securely stored either in hard copy or on computer hard drive.

If you have any call to complaint about our treatment of your personal information you can contact us or the Privacy regulator directly – they are accessible here:

www.oaic.gov.au.

We store our business data in a variety of ways including paper format, on software provided via Midwinter, on hard drives and via “cloud-based” OneDrive technology. We ensure that paper files are stored securely, are confident in Midwinter’s approach to client data security, computers are protected with anti-viral software and we believe Microsoft’s OneDrive is best of breed technology when it comes to cloud-based storage.

We are also happy to provide you with a copy of this Privacy Policy free of charge upon request.

APP 2 – anonymity and pseudonymity

Our policy: Although the Privacy Act makes provision for people to remain anonymous or use pseudonyms we believe it is impractical for us to deliver our services to you if you wish to do this.

APP3 – collection of solicited personal information

Our policy: We only collect information from you that we believe we need in order to deliver our services to you. Of course if we seek to collect “sensitive” personal information (as defined) from you we also seek your express consent first.

APP 4 – dealing with unsolicited personal information

Our policy: If we determine that we have obtained unsolicited personal information from you (i.e. information we don’t actually need in order to deliver our services to you) we will contact you and return it or otherwise remove it from our records as soon as is practicable.

APP 5 – notification of the collection of personal information

Our policy: Where we collect information about you other than directly from you we will advise you of this fact and provide any other information to you about that collection as is determined relevant in the circumstances and in light of sub-clauses 5.1 and 5.2 of the APPs.

APP 6 – use or disclosure of personal information

Our policy: If we use or disclose your personal information for any purpose other than the primary purpose of its collection (or any secondary purpose you have expressly consented to) we will advise you as soon as practicable.

APP 7 – direct marketing

Our policy: If we wish to use any information we have gathered from you for the purpose of direct marketing we will seek your express consent first unless the circumstances of collection made it reasonably likely that we collected the information for that purpose – even if this is not the primary purpose of collection.

Of course if we ever do this you will always have the option to “opt out” and not receive any direct marketing from us.

APP 8 – cross-border disclosure of personal information

Our policy: The only overseas recipient of your personal information we can currently imagine is the party that hosts any IT infrastructure that we back our business data to – e.g. via the so-called “cloud”. We will seek confirmation from any such service provider that they will treat your data securely and in alignment with the APPs. If we form the view that they are not able to treat client personal information in this way we will seek an alternative service provider.

If we determine that some other overseas party may also receive your personal information we will perform the same assessment as above before we engage with them.

APP 9 – adoption, use or disclosure of government related identifiers

Our policy: We won't use any Government related identifier as our own identifier of you unless it is necessary for us to deliver our services to you and in doing so we need to liaise or communicate with a Government Department or agency that requires us to use a Government related identifier.

APP 10 – quality of personal information

Our policy: We will do all we can to ensure the personal information we collect is accurate, up-to-date and complete.

APP 11 – security of personal information

Our policy: We will take all reasonable steps to maintain and store your personal information securely so long as we reasonably require it to deliver our services. Once we no longer require this information we will take all reasonable steps to ensure it is securely destroyed or returned to you or your nominated agent.

APP 12 – access to personal information

Our policy: We will provide you with access to the personal information we hold about you provided no statutory exception applies.

If we believe one does we will always advise you of our basis for refusing access so that you may consider your position viz-a-viz that refusal.

APP 13 – correction of personal information

Our policy: We are happy to rectify any personal information we hold about you should you (or we) consider our records to be inaccurate.

Contacting

If you have any questions about this Privacy Policy, please contact:

Daniel McGregor or David Harper

Directors

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