



PRIVACY POLICY

OUR COMMITMENT

VicWide Financial Services Pty Ltd abides by the National Privacy Principles (NPPs) established under the Privacy Amendment (Private Sector) Act, 2000. Our aim is to both support and ensure that we comply with the National Privacy Principles (NPPs) that form the basis of laws introduced to strengthen privacy protection for the general public. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

VicWide Financial Services Pty Ltd recognises that your privacy is very important to you. We believe that this Policy will address any potential concerns you may have about how the personal information you provide to us and our representatives is collected, held, used, corrected, disclosed and transferred.

COLLECTION

As a financial planning organisation we are subject to certain legislative and regulatory requirements that necessitate us obtaining and holding detailed information that personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you.

This includes:

- details of your financial needs and objectives;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- details of your investment preferences and aversion or tolerance to risk; and
- information about your employment history, employment circumstances, family commitments and social security eligibility.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

Generally, collection of your personal information will be effected in either face-to-face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

USE AND DISCLOSURE

We are obliged, pursuant to the Corporations Act, to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. However, you may, by



contacting us by any available method, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. 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.

Your personal information may be disclosed to external contractors for the following purposes:

- We regularly contract compliance experts to ensure that our representatives are meeting our compliance standards. This may involve disclosure of your personal information; and
- At times, paraplanning contractors or temporary staff will be hired to handle workloads during peak periods.

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 in accordance with this policy, by any contractor to whom it is disclosed. If you have any concerns in this regard please contact us.

In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting 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. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

SECURITY

Your personal information is generally held in your client file. All paper files are accessible to authorised personnel only and are appropriately secured out of hours.

Information may also be held on a computer database. All computer-based information is protected through the use of access passwords on each computer. Data is backed up regularly and stored securely off site.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times, your personal information is treated as confidential and any sensitive information is treated as highly confidential.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off site storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

ACCESS AND CORRECTION

You may at any time request access (in writing) to your personal information and we will (subject to certain exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you



with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

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 authorised by or under law; or
- 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.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information we hold about you is up to date and accurate. In the event that you become aware, or believe, that any Personal Information that we hold about you is inaccurate, incomplete or outdated, you may contact us and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

COMPLAINTS RESOLUTIONS

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us via our Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours 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.

Contact Details

Privacy Officer:	Mr Brian Thomson
Address:	63 Wyndham Street SHEPPARTON VIC 3630
Telephone :	03 5821 2366
Facsimile:	03 5831 2350
E-mail:	bthomson@vicwide.com