

Advice SA Privacy Policy

KOTD (SA) Pty Ltd, as Trustee for The Maastricht Kent Family Trust, trading as Advice SA (ABN 57 284 091 408) (**we, us, our**) respects and follows the Australian Privacy Principles (**APPs**) in the *Privacy Act 1988* (Cth) (**Privacy Act**). We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information (that is, information or an opinion about an identified individual, or an individual who is reasonable identifiable), including our obligations and your rights in respect of our dealings with your personal information.

Please take a moment to read our Privacy Policy as it describes what happens to your personal information that you provide to us, including information collected via our website at www.advicesa.com.au (the **Website**), or is otherwise collected by us in the course of our business activities.

1. How we collect your personal information

We will collect and hold your personal information in a fair and lawful manner, and not in an intrusive way. Where it is reasonably practical to do so, we will collect your personal information directly from you. We may collect the personal information you directly give us through some of the following means:

- (a) our initial appointment confirmation email, which may provide a link to enter client information into our financial planning software;
- (b) during our consultations with you;
- (c) in any forms that you complete, including Service Agreements;
- (d) when you make an inquiry in relation to services through the Website;
- (e) in administering and performing any contracts with you, or our service providers;
- (f) when you contact us via telephone or facsimile;
- (g) if you supply it to us in person;
- (h) from correspondence (whether in writing or electronically); through any mobile applications provided by our organisation;
- (i) while conducting customer satisfaction and market research surveys;
- (j) when administering any of our services; and
- (k) as otherwise required to undertake and manage our business.

However, in certain cases we may collect personal information from publicly available sources and third parties, such as suppliers, recruitment agencies, contractors, our clients and business partners.

As part of providing you with financial planning and advice services, we may also need to collect information from various product providers such as superannuation funds, investment managers, and insurance companies. We will not collect personal information from these third parties without your consent.

We may also collect information about you from your spouse, where you have consented to this occurring.

When we collect personal information from you, we will take such steps (if any) as are reasonable in the circumstances to notify you or ensure you are aware of:

- (a) our identity and contact details;
- (b) that we have collected your personal information, and whether that collection is required or authorised by law;
- (c) the purposes of collection;
- (d) the consequences if personal information is not collected (such as if this will affect our ability to provide products or services to you);
- (e) our usual disclosures of personal information of the kind collected;
- (f) information about this Privacy Policy; and

whether we are likely to disclose personal information to overseas recipients, and if practicable, the relevant countries in which they are located.

Some of the above information is included in this Privacy Policy.

If we collect personal information about you from a third party we will, where appropriate, request that the third party inform you that we are holding such information, how we will use and disclose it, and that you may contact us to gain access to and correct and update the information.

2. Types of personal information we collect

In order to provide you with personal financial advice, we require access to your personal information to assess your advisory needs and determine which financial products and strategies may be suitable for you. The kinds of personal information that we collect and hold may include (but are not limited to):

- (a) your name;
- (b) your date of birth;
- (c) your contact information, including postal and residential addresses, telephone and facsimile numbers, and email addresses;
- (d) billing information;
- (e) your job title and employment information (including history and qualifications); and
- (f) information about your financial affairs and personal circumstances.

We may also collect and hold sensitive information about you, including:

- (a) health information;
- (b) your membership of a political association, professional or trade association, or trade union;
- (c) your sexual orientation; and
- (d) your religious beliefs or affiliations.

We only collect sensitive information about you where it is necessary for us to perform our services and we have your consent, or otherwise in accordance with the Privacy Act. For example, information about your health might be required in circumstances where making an application for insurance, or assessing the viability of a lifetime annuity.

We may also need to collect your Tax File Number (TFN) to provide certain services. In such circumstances, we will tell you the law that authorises this collection, the purpose for which your TFN is collected, that it is not an offence to refuse to provide your TFN, the consequences of refusing to provide a TFN, and details of when we can lawfully use or disclose your TFN. We will not collect your TFN over the phone.

Where you do not wish to provide us with your personal information, we may not be able to provide you with requested goods or services, or the advice we provide you may be incomplete or fail to take all of your circumstances into account.

3. Our purposes for handling your personal information

As a general rule, we only process personal information for purposes that would be considered relevant and reasonable in the circumstances, including providing you with financial advice and other requested services.

We collect, hold, use and disclose personal information to:

- (a) assist with our financial planning process;
- (b) provide you with general and personal advice;
- (c) assess your needs and determine which financial products and strategies may be suitable for you;
- (d) administer your financial products;
- (e) implement your personal advice recommendations;
- (f) offer and provide you with our goods and services;
- (g) manage and administer those goods and services, including account keeping procedures;
- (h) communicate with you, including (but not limited to), emailing you tax invoices;
- (i) comply with our legal and regulatory obligations; and
- (j) otherwise to operate and manage our business.

We will not use or disclose your personal information for any other purpose unless you have consented to that use or disclosure.

In some circumstances we are required by law to collect personal information about you. For example under the Anti-Money Laundering and Counter Terrorism Financing Act we may be required to collect some personal information from you on behalf of the Australian Transaction Reports and Analysis Centre (**AUSTRAC**).

4. Who we disclose your personal information to

We may disclose personal information between our organisations or to third parties such as our suppliers, organisations that provide us with technical and support services, our professional advisors, or service providers and specialist providers who we engage to provide services to us, where permitted by the Privacy Act. If we disclose information to a third party, we generally require that the third party protect your information to the same extent that we do.

We use the services of the Guideway Group to provide you with financial advice. We will disclose your personal information to Guideway Group as part of this exercise. The Guideway Group consists of Guideway Financial Services Pty Ltd (ABN 46 156 498 538) and Guideway Licensee Services Pty Ltd (ABN 15 168 582 741). Contact the Guideway Group via its website at www.guideway.com.au to obtain a copy of its Privacy Policy.

Your personal information may be disclosed, if required to do so by the law, such as under the Anti-Money Laundering and Counter Terrorism Financing Act, or by Court Order. Where we are required to disclose your personal information, we will do so in accordance with our obligations under relevant legislation and the Privacy Act.

5. Protection of personal information

We will hold personal information as either secure physical records, electronically on our intranet system, in cloud storage, and in some cases, records on third party servers, which may be located overseas.

We maintain appropriate physical, procedural and technical security for our offices and information storage facilities so as to prevent any loss, misuse, unauthorised access, disclosure, or modification of personal information. This also applies to disposal of personal information.

We further protect personal information by restricting access to personal information to only those who need access to the personal information do their job. Physical, electronic and managerial procedures have been employed to safeguard the security and integrity of your personal information.

We will destroy or de-identify personal information once it is no longer needed for a valid purpose or required to be kept by law.

6. Direct marketing

Like most businesses, marketing is important to our continued success. We believe we have a unique range of products and services that we provide to customers at a high standard. We therefore like to stay in touch with customers and let them know about new opportunities. We may provide you with information about new products, services and promotions either from us, or from third parties which may be of interest to you.

We will not disclose your personal information to third parties for marketing purposes without your consent.

You may opt out at any time if you no longer wish to receive commercial messages from us. You can make this request by contacting our Privacy Officer.

7. Cookies

Advice SA ("us", "we", or "our") uses cookies on <http://advice.sa.com.au/> (the "Service"). By using the Service, you consent to the use of cookies.

Our Cookies Policy explains what cookies are, how we use cookies, how third-parties we may partner with may use cookies on the Service, your choices regarding cookies and further information about cookies.

What are cookies

Cookies are small pieces of text sent by your web browser by a website you visit. A cookie file is stored in your web browser and allows the Service or a third-party to recognize you and make your next visit easier and the Service more useful to you.

Cookies can be "persistent" or "session" cookies.

How Advice SA uses cookies

When you use and access the Service, we may place a number of cookies files in your web browser.

We use cookies for the following purposes: to enable certain functions of the Service, to provide analytics, to store your preferences, to enable advertisements delivery, including behavioural advertising.

We use both session and persistent cookies on the Service and we use different types of cookies to run the Service:

- Essential cookies. We may use essential cookies to authenticate users and prevent fraudulent use of user accounts.

Third-party cookies

In addition to our own cookies, we may also use various third-parties cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on.

What are your choices regarding cookies

If you'd like to delete cookies or instruct your web browser to delete or refuse cookies, please visit the help pages of your web browser.

Please note, however, that if you delete cookies or refuse to accept them, you might not be able to use all of the features we offer, you may not be able to store your preferences, and some of our pages might not display properly.

Where can you find more information about cookies?

For information on cookie settings of your internet browser, please refer to your browser's manual.

You can learn more about cookies here:
<http://www.youronlinechoices.com.au/>

8. Accessing and correcting your personal information

You may contact our Privacy Officer to request access to the personal information that we hold about you and/or to make corrections to that information, at any time. On the rare occasions when we refuse access, we will provide you with a written notice stating our reasons for refusing access. We may seek to recover from you reasonable costs incurred for providing you with access to any of the personal information about you held by us.

We are not obliged to correct any of your personal information if we do not agree that it requires correction and may refuse to do so. If we refuse a correction request, we will provide you with a written notice stating our reasons for refusing.

We will respond to all requests for access to or correction of personal information within a reasonable time.

9. Overseas transfers of personal information

As at the date of this Privacy Policy, we are not likely to disclose your personal information to overseas recipients.

If in future we do propose to disclose personal information overseas, we will do so in compliance with the requirements of the Privacy Act. We will, where practicable, advise you of the countries in which any overseas recipients are likely to be located.

If you do not want us to disclose your information to overseas recipients, please let us know.

From time to time we may engage an overseas recipient to provide services to us, such as cloud-based storage solutions. Please note that the use of overseas service providers to store personal information will not always involve a disclosure of personal information to that overseas provider. However, by providing us with your personal information, you consent to the storage of such information on overseas servers and acknowledge that APP 8.1 will not apply to such disclosures. For the avoidance of doubt, in the event that an overseas recipient breaches the APPs, that entity will not be bound by, and you will not be able seek redress under, the Privacy Act.

10. Resolving personal information concerns

If you have any questions, concerns or complaints about this Privacy Policy, or how we handle your personal information, please contact our Privacy Officer:

The Privacy Officer, Advice SA

Level 1
195 North Terrace
Adelaide SA 5000
Telephone: 08 8232 6494
Email: advice@advicesa.com.au

We take all complaints seriously and will respond to your complaint within a reasonable period.

If you are dissatisfied with the handling of your complaint, you may contact the Office of the Australian Information Commissioner:

Office of the Australian Information Commissioner

GPO Box 5218
Sydney NSW 2001
Telephone: 1300 363 992
Email: enquiries@oaic.gov.au

11. Changes

We reserve the right to change the terms of this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our Website.

The last update to this document was 18 March 2018.