

ShineWing Australia

Wealth Privacy Policy

When you trust us with your personal information, you expect us to protect it and keep it safe.

We take this responsibility seriously and we are bound by the *Privacy Act 1988* (Cth) ('Privacy Act'). We will protect your personal information in accordance with the *Australian Privacy Principles*. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

About this policy

This Privacy Policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide.

If you do not allow us to collect all of the information we request, we may not be able assist you in providing the products, services or advice you have requested. Where you provide limited information, we will make you aware of any limitations or risks of such providing.

What kinds of personal information do we collect and hold?

When you apply for our products or services we may ask for identification information. This could include your name, address, contact details and date of birth, financial situation, assets and liabilities. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it.

If you apply for insurance, we may collect information about what is being insured, the beneficiaries along with your health and financial situation, depending on the type of insurance.

Where we arrange finance or credit on your behalf, we may ask for information about your finance needs and your borrowing capacity.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

Why do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide you with products and services. This includes:

- Checking whether you are eligible for the product or service
- Assisting you where online applications are not completed
- Providing the product or service
- Managing the product or service, such as invoicing or client surveys.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business.

We may also use your information to internally help us improve our services with you.

How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product and/or service, or when you talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or if you send us electronic correspondence (see "Do we collect personal information electronically?").

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- Publicly available sources of information, such as public registers
- Your representatives (including your legal advisor, mortgage broker, executor, administrator, guardian, trustee, or attorney)
- Your employer
- Other organisations, who jointly with us, provide products or services to you
- Commercial information service providers, such as companies that provide fraud prevention reports
- Insurers, re-insurers and health care providers.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- Certain identification information about you as outlined in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* (No. 1)
- Your Tax File Number, if you choose to provide it as specified in the *Income Tax Assessment Act 1936*(Cth)
- Certain information in relation to your application if you have applied for insurance as required by the *Insurance Contracts Act 1984* (Cth).

How do we hold personal information?

Your personal information will be stored electronically in secure data centres which are owned by either ShineWing Australia, ShineWing Australia Wealth or by external service providers bound by the Australian Privacy Principles. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- Access to information systems is controlled through identity and access management
- Employees are bound by internal information security policies and are required to keep information secure
- All employees are required to complete training about information security
- We regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy your personal information when it is no longer needed for any purpose permitted under the Privacy Act. This requirement does not apply if we are required or authorised by law to keep it.

Who do we disclose your personal information to, and why?

We may provide personal information about our clients to organisations outside ShineWing Australia and ShineWing Australia Wealth. To protect personal information, we ensure our service providers comply with the Privacy Act. We only authorise our service providers to use or disclose your personal information for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- Our agents, contractors and external service providers (for example, mailing houses and technology service providers)
- Paraplanning service providers
- Insurers, re-insurers and health care providers
- Payment systems operators (for example, merchants receiving card payments)
- Other organisations, who jointly with us, provide products or services to you
- Financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers
- We receive services to support the credit broking services we give you. We receive mortgage aggregation services from PLAN Australia. Sometimes they collect personal information about customers to manage commission payments. If you want to find out how they manage your personal information on their website <http://www.planaustralia.com.au/privacy-policy>.
- Debt collectors
- Our representatives (including legal advisors, compliance advisors or auditors)
- Your representatives (including your legal advisor, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney)
- Fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct
- IT service providers
- External dispute resolution schemes
- Regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside ShineWing Australia and ShineWing Australia Wealth where:

- We are required or authorised by law or where we have a public duty to do so
- You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances
- We are otherwise permitted to disclose the information under the Privacy Act.

Do we disclose personal information overseas?

Our business is affiliated with other businesses located overseas. In the course of doing business with you, we may disclose some of your personal information to overseas recipients. However, we will only do so where:

- It is necessary to complete the transaction you have entered into; or
- We believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- It is otherwise permitted by law.

At present, some of our network entities may exchange data with our overseas affiliate located in India.

Please refer to ShineWing Australia's full Privacy Policy on their website <http://www.shinewing.com.au/privacy-policy> for further information.

Do we use or disclose personal information for marketing?

We may use your personal information to offer you products and services we believe may interest you. We may send you direct marketing communications such as offers, updates, events, articles or newsletters. We will always give you the option of electing not to receive any of these communications in the future by notifying us or unsubscribing at any time.

Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits
- Which pages are viewed
- How users navigate through the site and interact with pages (including fields completed in forms and applications completed)
- Location information about users
- Information about the device used to visit our website
- IP addresses.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent or retrieved by any another website.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platforms that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Access to and correction of personal information

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee payable for updating or correcting your personal information. Should you request access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access to or to correct your personal information we will give you a notice explaining our reasons, except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

Resolving your privacy concerns and complaints – your rights

If you are concerned about how your personal information is being handled or if you have a complaint about a breach of the *Australian Privacy Principles*, please contact us.

We are committed to resolving complaints within a fair and reasonable timeframe. Wherever possible, complaints will be resolved promptly at first point of contacts. Where this is not possible, we aim to resolve complaints within five business days.

If your complaint exceeds five business days, we will contact you with a status report and expected resolution date.

If you are unhappy with our response, there are other bodies you can go to including the Financial Ombudsman and the Office of the Australian Information Commissioner.

Financial Ombudsman Service

The Financial Ombudsman Service (FOS) can consider most privacy complaints involving providers of financial services.

FOS can be contacted at:

Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001
Phone: 1300 78 08 08
www.fos.org.au

Office of the Australian Information Commissioner

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

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

Contact us

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to:

Attention: Privacy Officer
ShineWing Australia Wealth
Level 10, 530 Collins Street
Melbourne, VIC 3000

You can also call or visit our offices in person:

Phone: +61 3 8635 1800

In-person: Level 10/530 Collins Street, Melbourne VIC 3000

Changes to the Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy.

Client consent

By asking us to assist with your financial and finance needs, you consent to the collection and use of the information you have provided us with for the purposes described above.

Meaning of words

We, us or our means:

ShineWing Australia Wealth ABN 34 006 341 386, Australian Financial Services and Australian Credit License Number 236556.