

**Last updated: 15 July 2018**

## **Privacy Policy**

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

We are bound by the *Privacy Act 1988* (Cth) ('Privacy Act') and 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 to deliver all of those services effectively.

### ***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. 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, and your health and financial situation, depending on the type of insurance.

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.

***For what purposes 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 advice, products and services. This includes:

- providing you with personal financial advice
- checking whether you are eligible for the product or service;
- assisting you where online applications are not completed;
- providing the product or service; and
- helping manage the product or service.

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 tell you about products or services we think may interest 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 or service or 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 adviser, 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; and
- 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 by 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, by the *Income Tax Assessment Act 1936* (Cth); and
- certain information in relation to your application if you have applied for an insurance as required by the *Insurance Contracts Act 1984* (Cth).

***How do we hold personal information?***

Much of the information we hold about you will be stored electronically in secure data centres which are located in and owned by either internal or external service providers. 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; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

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

We may provide personal information about our clients to organisations outside Spinifex Private Wealth. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them 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;
- debt collectors;
- our, legal advisers or auditors;
- your representatives (including your legal adviser, 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;
- Our Licensee, Securitor Financial Group Limited (“Securitor”) and their related entities;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside Spinifex Private 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; or
- we are otherwise permitted to disclose the information under the Privacy Act.

***Do we disclose personal information overseas?***

We may disclose your personal information to a recipient which is located outside Australia. This includes:

- Any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

***Do we use or disclose personal information for marketing?***

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means , such as through social media or targeted advertising through Spinifex Private Wealth websites.

We may also disclose your personal information to companies outside Spinifex Private Wealth who assist us to market our products and services to you.

If you don't want to receive marketing offers from us please contact us.

### ***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; and
- 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 to another site, or be retrieved by any non- Spinifex Private Wealth site.

We won't ask you to supply personal information publicly over facebook, Twitter, or any other social media platform 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 for requesting that your personal information is corrected or for us to make corrections. In processing your request for 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 by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

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](http://www.fos.org.au)

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](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)

### **Contact us**

You can contact us by:

- calling 02 8249 1969
- emailing [admin@spinifexprivate.com.au](mailto:admin@spinifexprivate.com.au)
- visiting [www.spinifexprivate.com.au](http://www.spinifexprivate.com.au)
- writing to us at Level 19, 1 O'Connell Street, Sydney NSW 2000.

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to Level 19, 1 O'Connell Street, Sydney NSW 2000.

### **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. An up-to-date version is available on [www.spinifexprivate.com.au](http://www.spinifexprivate.com.au) or by calling us on 02 8249 1969.

### **Meaning of words**

**We, us** or **our** means:

- Spinifex Private Wealth Pty Ltd T/A Spinifex Private Wealth ABN 20 60 390 4276.