

# Privacy Policy

Protecting clients' privacy is very important to us. To ensure our compliance with the Privacy Act 1988 (Cth) (the Privacy Act) and as part of our commitment to ensuring the safety of our clients' private and confidential information, we have established and implemented this Privacy Policy.

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles, which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations in the financial industry.

## **What kind of information do we hold?**

We may collect and hold a range of personal information about you to provide you with our services, including:

- Name, date of birth and occupation.
- Address, phone numbers and email addresses.
- Driver's licence details.
- Bank account details.
- Financial information, including details of your investments, your insurance policies, estate planning strategies, taxation information, and health information.
- Credit information, including: details of assets, liabilities, income, expenses; information about your consumer credit liabilities, such as the name of an entity that has provided you with credit, the date the credit was provided, and the maximum amount of credit made available, the type and amount of credit you sought in an application, information about new credit arrangements you have entered into as a result of defaulting in repayments, publicly available information that relates to your credit worthiness, any other personal information that may impact our assessment of your credit worthiness.

## **How do we collect personal information?**

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms, and other interactions with you while

providing you with our products and services, including when you visit our website, use a mobile app from us, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, or marketing agencies. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

We do not give you the option of dealing with them anonymously, or under a pseudonym. This is because it is impractical, and, in some circumstances, illegal for Core Wealth Group Pty Ltd trading as Core Wealth Financial Planning ABN 93 618 056 983, AFSL No. 535023 (Core Wealth) to deal with individuals who are not identified.

### **Unsolicited personal information**

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information, we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

## **Website collection**

We collect personal information from our website when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. You can view and access our Privacy Policy by clicking on the privacy button on our website.

To use our website, you must consent to our use of cookies. You can withdraw or modify your consent to our use of cookies at any time. Please note that if you set your browser to refuse cookies, you may not be able to use all the features of our website.

Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information. Cookies are small text files which are transferred to your computer's hard drive through your web browser that enables our website to recognise your browser and capture and remember certain information.

## **Why do we collect and hold personal information?**

We may use and disclose the information we collect about you for the following purposes:

- Provide you with our products and services.
- Review and meet your ongoing needs.
- Provide you with information we believe may be relevant or of interest to you.
- Let you know about other products or services we offer, send you information about special offers or invite you to events.
- Consider any concerns or complaints you may have.
- Comply with relevant laws, regulations, and other legal obligations.
- Help us improve the products and services offered to our customers and enhance our overall business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

### **Who might we disclose personal information to?**

We may disclose personal information to:

- A related entity of Core Wealth
- An agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors, or other advisers.
- Organisations involved in a transfer or sale of all or part of our assets or business.
- Organisations involved in managing payments, including payment merchants and other financial institutions, such as banks.
- Regulatory bodies, government agencies, law enforcement bodies and courts.
- Financial product issuers and credit providers.
- Third-party auditors as part of our compliance review process.
- Anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

### **Sending information overseas**

We will not send personal information to recipients outside of Australia.

### **Management of personal information**

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- Passwords are required to access the system and passwords are routinely checked.
- Data ownership is clearly defined.
- Employees have restricted access to certain sections of the system.
- The system automatically logs and reviews all unauthorised access attempts.
- Unauthorised employees are barred from updating and editing personal information.
- All computers which contain personal information are secured both physically and electronically.

Where our employees work remotely or from home, we implement the following additional security measures:

- Two-factor authentication is enabled for all remote working arrangements.
- Password complexity is enforced
- We ensure that employees only have access to personal information which is directly relevant to their duties.
- Employees are not permitted to work in public spaces.
- We use audit trails and audit logs to track access to an individual's personal information by an employee.
- We monitor access to personal information and will investigate and take appropriate action if any instances of unauthorised access by employees are detected.
- Employees must ensure that no other member of their household uses their work device.
- Employees must store devices in a safe location when not in use.
- Employees may not make hard copies of documents containing personal information, nor may they email documents containing personal information to their personal email accounts.
- Employees may not disclose an individual's personal information to colleagues or third parties, via personal chat groups.

## **Direct marketing**

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- The personal information does not include sensitive information; and
- You would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- We provide a simple way of opting out of direct marketing; and
- You have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

## **How do we keep personal information accurate and up to date?**

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up to date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is

inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

### **Accessing your personal information**

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting Core Wealth's Privacy Officer. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

### **Update to this Privacy Policy**

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

### **Responsibilities**

It is the responsibility of management to inform employees and other relevant third parties about this Privacy Policy. Management must ensure that employees and other relevant third parties are advised of any changes to this Privacy Policy.

All new employees are to be provided with timely and appropriate access to this Privacy Policy, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Privacy Policy may be subject to disciplinary action.

### **Non-compliance & disciplinary actions**

Privacy breaches must be reported to management by employees and relevant third parties. Ignorance of this Privacy Policy will not be an acceptable excuse for non-compliance. Employees or other relevant third parties that do not comply with this Privacy Policy may be subject to disciplinary action.

### **Contractual arrangements with third parties**

We ensure that all contractual arrangements with third parties adequately address privacy issues.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act. These policies include:

- Regulating the collection, use and disclosure of personal and sensitive information.
- De-identifying personal and sensitive information wherever possible.
- Ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties.
- Ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

### **Your rights**

This Privacy Policy contains information about how:

- You may access the personal information we hold about you.
- You may seek the correction of your personal information.
- You may ask us to provide an alternative means of identity verification for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).
- You may complain about a breach of the Privacy Act, including the APPs.
- We will deal with a privacy complaint.

### **Incidents/complain handling/making a complaint**

We have an effective complaint handling process in place to manage privacy risks and issues.

This is available on our website. The complaints handling process involves:

- Identifying (and addressing) any systemic/ongoing compliance problems.
- Increasing consumer confidence in our privacy procedures.
- Helping to build and preserve our reputation and business.



You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer.

If you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

Writing – c/o Andrew Gannon & Scott Tanner. Suite F1, 45 Northside Drive, Hillarys WA  
6025

Emailing – [afsl@corewealthfp.com.au](mailto:afsl@corewealthfp.com.au)

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

Telephoning – 1300 363 992

Writing – Director of Complaints, Office of the Australian Information Commissioner, GPO  
Box 5218, SYDNEY NSW 2001

Emailing – [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)