

Centric Wealth Privacy Policy

1.0 National Privacy Principles

- 1.1 Centric Wealth abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2000. A summary of the National Privacy Principles is available on our website www.centricwealth.com.au or by contacting our office.

2.0 Personal information collected by Centric Wealth and legislative requirements, which require the collection and holding of personal information.

- 2.1 As a diverse financial services group we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information, which 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 other services is dependent on us obtaining certain personal information about you, including:
- i. employment details and employment history;
 - ii. details of your financial needs and objectives;
 - iii. details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, superannuation, existing general insurance arrangements, or existing lending facilities;
 - iv. details of your investment preferences and aversion or tolerance to risk; and
 - v. information about your employment history, employment circumstances, family commitments and social security eligibility.

3.0 Detail any consequences of not providing the requested personal information.

- 3.1 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.
- 3.2 As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia and other relevant professional bodies to collect sufficient information to ensure appropriate advice and services can be given in respect of recommendations made to our clients, if

you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

4.0 Detail of information collection policies.

- 4.1 We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.
- 4.2 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.
- 4.3 We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:
- (i) the preparation of your financial Plan or Statement of Advice ;
 - (ii) the provision of financial planning, superannuation, risk insurance, general insurance or lending advice to you;
 - (iii) making securities, investment, superannuation, risk insurance, general insurance and lending recommendations;
 - (iv) reviewing your financial plan, superannuation, risk insurance and general insurance or lending arrangements; and
 - (v) reviewing securities, investment, superannuation, risk insurance, general insurance and lending recommendations.

5.0 Information to Centric Group Entities

- 5.1 In order to provide to you the services that you have requested personal information about you may be shared between business units within Centric Wealth as a consequence of your:-
- identified need; or
 - in response to a specific request or instruction from you

6.0 Detail of information use and disclosure policies.

- 6.1 We will not use or disclose personal information collected by us for any purpose other than:
- (i) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or

- (ii) where you have consented to such disclosure; or
 - (iii) where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.
- 6.2 We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia and other relevant industry bodies to make certain information available for inspection by the various industry bodies on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also 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.
- 6.3 We may use the personal information collected from you for the purpose of providing you with direct marketing material such as information about other related services offered by us and articles that may be of interest to you however you may, by contacting the Privacy Officer request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.
- 6.4 We may disclose your personal information to another financial planner during periods when this office is unmanned or closed so that you can be assured of receiving a continued service.
- 6.5 We may disclose your Personal information to superannuation fund trustees, insurance providers, Fund Managers, Custodians, lenders and other credit providers, credit reference and reporting agencies, mortgage originators and mortgage managers, registered valuers, product issuers, medical testing laboratories and associated personnel, for the purpose of giving effect to your financial plan and the recommendations made by us.
- 6.6 In the event of a dispute, complaint or pending litigation we may disclose information to our legal representatives, relevant industry dispute resolution body or other related organisation for the purposes of resolving or responding to issues.
- 6.7 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 any agent or representative in accordance with this policy will maintain your information. If you have any concerns in this regard, you should contact us by any of the methods detailed below.
- 6.8 We may disclose your personal information to external contractors for the following purposes:
- (i) storing information;

- (ii) audit of company accounts; and
- (iii) compliance framework review
- (iv) IT providers
- (v) printing houses
- (vi) courier companies
- (vii) solicitors, lawyers and other legal advisers.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. We will confirm with external contractors that they have systems and procedures for handling personal information in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

- 6.9 We will advise you of any change in business circumstances that may affect the handling of your personal information.

7.0 Document storage and security policies and practices.

- 7.1 Your personal information is generally held in your client file. Information may also be held in a computer database.
- 7.2 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. All paper files are stored in lockable cabinets, which are locked out of hours. All record movements off premises are recorded in a central register. Allowing only authorised personnel access to the premises. All computer-based information is protected through the use of access passwords on each computer and screen saver passwords. The Disaster Recovery Plan includes provision for data to be backed up each evening and stored securely off site.
- 7.3 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.

8.0 Detail how the individual may gain access to their personal information.

- 8.1 You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following 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.

8.2 We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

8.3 We will not provide you with access to your personal information if:

- (i) providing access would pose a serious threat to the life or health of a person;
- (ii) providing access would have an unreasonable impact on the privacy of others;
- (iii) the request for access is frivolous or vexatious;
- (iv) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- (v) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- (vi) providing access would be unlawful;
- (vii) denying access is required or authorised by or under law;
- (viii) 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.

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

9.0 Access and correction policies and procedures.

9.1 We will endeavour to ensure that, at all times, the personal information about you, which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below 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.

9.2 If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

9.3 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.

10.0 Making a Privacy complaint.

10.1 If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us by any of the

methods detailed below and request that your complaint be directed to the 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.

11.0 Information collected on online

- 11.1 Centric Wealth's Website may at times contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.
- 11.2 While it is not necessary to register your personal details to use our Web site, we may in future offer a registration service, which will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address.
- 11.3 If you have registered with us and decide, at any time, that you do not wish to receive any further information from us, you can send e-mail to the e-mail address noted below requesting to be removed from our online registration database. Please allow 2 weeks for your request to be actioned.
- 11.4 You may amend or update your registration details by sending e-mail to the e-mail address noted below providing your amended details. Please allow 2 weeks for your request to be actioned.
- 11.5 Our Web site may use cookies, which would allow us to identify your browser while you are using our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

Changes to this policy

To keep up with regulatory, technical and business change, we may amend this policy from time to time by publishing the updated policy on our website.

Contacting us

For further information, problems or complaints regarding your personal information or our information handling practices, please contact our Privacy Officer by e-mailing privacy@centricwealth.com.au, calling 02 9250 6500 or writing to **Attn: Privacy Officer Level 2, 7 Macquarie Place Loftus Street Sydney NSW 2000.**