

## Privacy Policy

### **Introduction**

Priority Wealth Advisers Pty. Ltd. ('Priority Wealth Advisers') recognises that your privacy is very important to you, which makes it equally important to us. Priority Wealth Advisers complies strictly with the requirements of the *Privacy Act (1988)* and is committed to supporting the Australian Privacy Principles (APPs) set out in the *Privacy Amendment (Enhancing Privacy Protection) Act 2012*. The 13 Australian Privacy Principles are grouped into five parts:

- Part 1 — Consideration of personal information privacy (APPs 1 and 2)
- Part 2 — Collection of personal information (APPs 3, 4 and 5)
- Part 3 — Dealing with personal information (APPs 6, 7, 8 and 9)
- Part 4 — Integrity of personal information (APPs 10 and 11)
- Part 5 — Access to, and correction of, personal information (APPs 12 and 13)

This Privacy Policy addresses how personal information you provide Priority Wealth Advisers is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request by contacting Priority Wealth Advisers directly via any of the methods below.

Priority Wealth Advisers reviews this Privacy Policy annually to ensure it maintains practices, procedures and systems that comply with the APPs and deals with related inquiries and complaints.

### **Collection**

Priority Wealth Advisers, as a financial planning firm, is subject to certain legislative and regulatory requirements, which necessitate obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you ("personal information"). In order to provide you with comprehensive financial planning and advice, Priority Wealth Advisers requires certain personal information about you. The personal information we collect depends on the services we provide to you, and may include:

- names and contact details;
- date of birth and gender;
- proof of identity (for example, driver licence or passport);
- government issued identification numbers, such as tax file numbers (TFNs);
- employment details and employment history;
- details of your financial needs and objectives;

- details of your current financial circumstances, including your assets (both actual and potential), income, expenditure, insurance cover and superannuation;
- credit related information, such as your liabilities (actual and potential), current credit providers, credit limits and repayment arrangements;
- details of your investment preferences and aversion or tolerance to risk;
- information about your employment history, employment circumstances, family commitments and social security eligibility; and
- medical history and health information for risk insurance applications.

Priority Wealth Advisers may hold some or all of this information about you. Priority Wealth Advisers collects personal information directly from you by way of face-to-face interviews, a Fact Find form, telephone conversations, video conferences and email communications. It may be necessary in some circumstances for Priority Wealth Advisers to collect your personal information from a third party, such as your personal representative, accountant, solicitor or mortgage broker. Priority Wealth Advisers may also collect personal information from list purchases, referrals from individuals and referrals from businesses, such as your accountant.

Priority Wealth Advisers collects, holds and uses personal information for a number of purposes, including to:

- provide you with financial services, including:
  - the preparation of your financial strategy;
  - the provision of financial planning advice to you;
  - making securities and investment recommendations;
  - reviewing your financial strategy and securities and investment recommendations;
  - the provision of risk insurance advice and cover;
- administrative and operational purposes, such as completing application forms and processing transactions;
- providing credit advice in regard to structuring and managing your debt;
- estate planning strategies and advice; and/or
- for other related matters;
- verify your identity;
- keep you informed of our seminars and other events;
- conduct surveys to assist us to improve the delivery of our services; and
- meet any regulatory obligations.

If you provide Priority Wealth Advisers with another person's personal information, you should only do so if you have their authority or consent to provide us with that information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

The *Corporations Act 2001* and Rules of Professional Conduct of the Financial Planning Association of Australia require us to collect sufficient information to ensure appropriate advice 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 terminate our services to you if we believe we are unable to provide you with the services requested in a compliant and value-add manner. Therefore, Priority Wealth Advisers is not able to act on your behalf if you wish to remain anonymous or use a pseudonym when dealing with us.

If we need to obtain sensitive information from you, such as health details for insurance applications, we will ask for your consent, unless an exception applies under Australian law.

Priority Wealth Advisers will destroy or de-identify all unsolicited personal information received, where we determine that the information could not have been collected under the Australian Privacy Principles. Unsolicited personal information includes extra information you might send to us that has not been requested for the financial service currently being provided for you.

### ***Use and disclosure***

We will not use or disclose personal information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure;
- where you have consented to such disclosure; or
- where the Australian 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.

The Rules of Professional Conduct of the Financial Planning Association of Australia may require Priority Wealth Advisers to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information.

The *Corporations Act 2001* further requires Priority Wealth Advisers to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission. Priority Wealth Advisers may also be required to provide certain personal information to third parties under the *Anti-Money Laundering (AML) and Counter-Terrorism Financing Act (2006)* and taxation legislation.

Priority Wealth Advisers may use personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. If you do not wish to receive such information you may request not to receive it, by advising us via any of the methods detailed below. Please allow 2 weeks for your request to be actioned

Personal information may be disclosed to superannuation fund trustees, insurance providers, credit providers, brokers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us. We do not disclose your personal information to credit reporting bodies.

Priority Wealth Advisers ensures a high level of service to its clients by ensuring that other Priority Wealth Advisers representatives and staff have access to client information for the purposes of assisting you as necessary during periods of absence of your adviser or to field administrative

enquiries. It is a condition of employment at Priority Wealth Advisers that all representatives and staff adopt and adhere to this Privacy Policy.

External contractors must adopt and adhere to our Privacy Policy as a condition of their ongoing services to the business. You can be assured, that your information will be maintained in accordance with this policy by any contractor to whom it is disclosed.

In the event that we propose to sell our business, we may need to disclose some of your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

### ***Access and correction***

We endeavour to ensure your personal information is accurate, up-to-date and complete.

You may contact us at any time to request access to, or correction of, the personal information held by us. Prior to providing access or correction we will require you to provide evidence of your identity. We try to make your information available within 30 days of your request. Any charge we make for providing access will be reasonable.

In certain circumstances we may not be able to provide you with access or correct your personal information if there is a law that permits us or requires us not to. For example, we are not required to provide you with access to your personal information if:

- providing access would pose a serious threat to the life, health or safety of a person, or to public health or public safety;
- providing access would have an unreasonable impact on the privacy of others;
- we reasonably conclude the request for access is frivolous or vexatious; or
- providing access would be unlawful.

An explanation will be provided in the event that personal information requests are refused.

### ***Security***

Priority Wealth Advisers representatives and staff may ask you to answer 2 (or more) questions regarding your identity to help protect your personal information during non face-to-face communications, such as telephone calls.

Personal information is generally held in client files and on computer databases.

Priority Wealth Advisers regularly reviews information security to ensure personal information is protected from misuse, interference, loss, unauthorised access, modification or disclosure. At all times personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable rooms. Access to Priority Wealth Advisers's premises is tightly controlled and security systems are in place within the buildings.

All computer-based information is protected through the use of firewalls, access passwords on each computer and screen saver passwords. Data is regularly backed up and stored securely off site.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in our secure 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.

### ***Online considerations***

Information is gathered as a result of visits to Priority Wealth Advisers's website including, time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

When you log into the client section of our site, we may use cookies to identify who you are, while you are logged in for the session. The cookie is unique to that session, and the data within the cookie is encrypted.

### ***Government related identifiers***

We will not adopt as our own any identifiers that you may provide to us such as Tax file numbers (TFNs), Medicare numbers, Centrelink reference numbers and driver licence numbers. Priority Wealth Advisers will not use or disclose a government related identifier of an individual unless authorised by Australian law.

### ***Complaints resolution***

If you are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint, you should contact our Compliance Manager by one of the methods below. Your complaint will be considered and responded to within 14 days. We will seek to address any concerns that you have through our complaints handling processes. If you are unhappy with our response, you are entitled to contact the Australian Financial Complaints Authority (AFCA), an external dispute resolution (EDR) recognised under the Privacy Act, which may investigate your complaint further. Privacy complaints can also be made to the Office of the Australian Information Commissioner (OAIC).

Further details of the complaints resolution process are included in the Financial Services and Credit Guide (FSCG) available on our website.

### ***Sending data overseas and third-party websites***

In some circumstances Priority Wealth Advisers may disclose your personal information to a third-party Australian company contracted to support our customer services team. The data remains in Australia and is accessed, not retained, by the third-party. The services are currently provided by employees based in the Philippines.

Priority Wealth Advisers does not send any personal information about clients overseas unless:

- you consent to this,
- we reasonably believe that the other country has privacy laws substantially similar to our own,
- we take reasonable steps to ensure any overseas recipients of personal information do not breach the Australian Privacy Principles, or
- we are required under Australian law.

Our website may contain links to other websites. When visiting these websites be sure to check the Privacy Policy as we are not responsible for privacy practices of those other parties.

*Date: 31 May 2021*

**Contact us**

If you seek any further information from Priority Wealth about our Privacy Policy, please contact us:

Email            sheree@prioritywealth.com.au

Address        Suite7, 11 Ventnor Avenue, West Perth WA 6005

Telephone     08 9322 3325