

## Privacy Policy

### **Our Commitment:**

AAA Financial Intelligence Limited abides by the National Privacy Principles established under the Privacy Amendment (Private sector) Act 2000. We believe that this statement will address any potential concerns you may have about how personal information you provide to us is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request about the way we manage the personal information we hold. If you seek any further information please contact us in one of the following ways.

### **Collection:**

As a financial services organization 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 your ("personal information"). In addition, our ability to provide you with a comprehensive advisory service is dependent on us obtaining personal information about you including:

- Employment details and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including assets and liabilities (both actual and potential), income expenditure, insurance cover and superannuation;
- Details of your investments preferences and aversions or tolerance to risk;
- Information about your employment history along with family history and circumstances and commitments and social security eligibility;
- Any other information relevant to your needs.

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 you.

We are required, pursuant to the Corporations Act, 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 elect to terminate our retainer with you if we believe we are unable to provide you with an appropriate service.

### **Use and Disclosure:**

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:

- The preparation of your financial plan;
- The provision of financial planning advice to you;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- Any other information relevant to your needs.

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 disclosure; or
- Where you have consented to such disclosure; or
- 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.
- For the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia 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. 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.

We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our authorised representatives who will be your primary point of contact with our 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. We will not adopt as our own any identifiers that which you may provide such as Medicare numbers etc.

In the event that we propose to sell our business we may disclose 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.

### **Security:**

Your personal information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized 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 that are secured out of hours. Access to our premises is controlled, only personnel with security passes gain access to the premises. All computer-based information is protected through the use of access passwords on each computer and screen saver passwords. All data is regularly backed up and stored securely off site.

### **Access:**

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information. We will then (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.

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.

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

- Providing access would pose a serious threat to the life or health of a person;
- Providing access would have an unreasonable impact on the privacy of others;
- The request for access is frivolous or vexatious;
- The information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- Providing access would reveal our intentions in relations to negotiations with you in such a way as to prejudice those negotiations;
- Providing access would be unlawful
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body request that access not be provided on the grounds of national security.

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

### **Accuracy of Information:**

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 inaccurate, incomplete or outdated information and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

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 the accuracy or completeness of that information.

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.

### **Complaints Resolution:**

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 direct 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.

### **Third Party Web Sites:**

AAA Financial Intelligence Limited maintains links to other web sites whose operators may or may not adhere to a privacy policy or be governed by the National Privacy Principles.

While it is not necessary to register your personal details to use our web site, we do offer a registration service, which will enable you to receive product and service updates, newsletter 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.

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 an 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.

You may amend or update your registration details by sending an e-mail to the e-mail address noted below providing your amended details. Please allow two weeks for your request to be actioned.

**Cookies:**

Our Web site uses cookies, which allows 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.

**Privacy Officer:**

Please address your enquiries to:

Privacy Officer  
AAA Financial Intelligence Limited  
PO Box 763  
Morphett Vale SA 5162

Email : [invest@aaafi.com.au](mailto:invest@aaafi.com.au)