# SPM INVESTMENT GROUP PTY LTD

## Privacy Policy

SPM Investment Group Pty Ltd (**SPM IG**) is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Act 1998 (Cth) sets out a number of Australian Privacy Principles, our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

SPM IG has provided this Privacy Policy to describe how the personal information you provide to us, and our representatives, is collected, used, held, disclosed and disseminated. This Policy also sets out how you may access your personal information, how that information may be corrected and our complaints handling procedures for privacy matters.

A copy of this Privacy Policy is available from our website at www.spm-ig.com.au, or you can contact us to request a copy. We encourage you to check the website regularly for any updates to our Privacy Policy. This policy is subject to annual review.

### Your Personal Information

SPM IG is required to meet particular legislative and regulatory requirements, including obligations under Commonwealth legislation such as the Corporations Act 2001, Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and the Tax Agent Services Act 2009 in order to provide our advice and services to you. Detailed below is some of the information you may be required to provide:

- Your name, date of birth, tax file number, current addresses, telephone/mobile/fax numbers, email address;
- Information regarding your dependents and family commitments;
- Your occupation, employment history, details of family commitments, social security eligibility, health information or other information the organisation considers necessary;
- Your financial needs and objectives;
- Your assets and liabilities (current and future), income, expenses;
- Your superannuation and insurance details;
- Your social security entitlements; and
- Your risk profile details.

If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking. However, you can deal with us anonymously or by a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

### How We Collect Personal Information

SPM IG collects personal information in a number of ways, including:

- Directly from you, when you attend a face-to-face interview;
- Directly from you, when you provide information through a data collection form;
- Directly from you, when you provide information by phone;
- Directly from you via an email or the internet; and
- Directly from fund managers, superannuation funds, life insurance companies and other product issuers once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party.

## How We Use Your Personal Information

Primarily, your personal information is used in order to provide comprehensive and/or limited financial planning services to you. The personal information is also collected to:

- Advise and provide you with a relevant product or service;
- Manage and administer the product or service; and
- Protect against fraud.

From time to time we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. We will always give you the option of electing not to receive these communications in the future. If, at any time, you no longer wish to receive this information you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a register for those individuals not wanting to receive direct marketing material.

We do not sell, trade, or rent your personal information to others.

## When We Disclose Your Personal Information

In line with modern business practices common to many financial institutions and to meet your specific needs we may disclose your personal information to organisations outside SPM IG, which may include:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service;
- compliance consultants to ensure that our representatives are meeting our compliance standards;
- paraplanning contractors or temporary staff to handle workloads during peak periods;
- mailing houses;
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers to protect, maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems, electronic data backup and disaster recovery planning;
- financial services technology service providers to provide the most efficient, effective and accessible services to you via secure web-based software platforms;
- government and regulatory authorities and other organisations, as required or authorised by law;
- related entities of SPM IG, including SPM Capital Pty Ltd and SPM Financial Pty Ltd, to provide specialised client, business and administrative functions to SPM IG; and
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business. 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.

SPM IG may release your personal information to Love and Partners Accountants (accounting services), McInnes Wilson (general and contractual legal advice) and Evans and Partners (investment trading/portfolio services). SPM IG identifies these specific providers as external service providers to SPM IG and its related entities who may conduct their own business using your personal information.

SPM IG takes its obligations to protect your information seriously at all times. Our employees and all external service providers/contractors are obliged to respect the confidentiality of any personal information held by SPM IG.

Rigorous due diligence procedures are carried out before SPM IG or its related entities enters into any new arrangement that may require disclosure of your personal information, and for external service providers this includes ensuring appropriate privacy measures including physical and virtual security

measures are in place to protect the confidentiality of any personal information. These arrangements are reviewed regularly.

As part of our operations some uses and disclosures of your information may occur outside of Australia, for example if we seek insurance terms from an overseas insurer. If this is likely to happen we inform you of where the insurer is located, if it is possible to do so. In some circumstances we may need to obtain your consent before your information is disclosed outside of Australia.

Certain technology service providers that we utilise e.g. cloud-based data storage, technology and/or software providers, may store information across multiple countries. These include data and file storage providers, accounting and financial software service providers and back-up storage providers whose infrastructure is held in Australia, Canada, New Zealand, Europe, United Kingdom and the US. All providers are vetted to ensure they are compliant with all privacy regulations where they operate, for example the General Data Protection Regulation (GDPR) covering Europe (considered the toughest privacy and security law in the world) and the international ISO27001 standard for information security management systems, as relevant.

The Corporations Act 2001 (Cth) has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you. We also collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

Should you wish to obtain further detail about any of these disclosure arrangements, service providers or obligations, you can ask our office at any time and we will be happy to discuss.

## How We Store and Secure Your Personal Information

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect it from unauthorised access, interference, modification and disclosure.

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours.

Your personal information will also be held on our computer database. All electronic information is protected through the use of a variety of computer and network security measures including firewalls, user identifiers and password management.

Electronic information is backed up regularly and stored securely off site. We may use storage providers who are located overseas, however, if we do, we take all reasonable precautions to ensure the information is protected in accordance with the Privacy Act 1988 including imposing strict contractual arrangements regarding the confidentiality, use, access and security of the information stored. Other security measures taken include:

- Confidentiality requirements for our employees
- Physical security measures over our premises and records
- Providing a discreet environment for confidential discussions

All information will be treated as strictly confidential at all times.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be deleted from our electronic records or

securely destroyed, via a professional and secure document destruction company or via an onsite shredder.

## Ensure Your Personal Information Is Correct

SPM IG takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness we review your information on a regular basis, however we also recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

## Access and Correction to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) to our Privacy Officer at the contact details provided at the end of this Policy, and we will provide you with access to that personal information within 30 days of receiving your request. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete within 30 days of receiving the correction request.

We do not charge for receiving a request for access to personal information or for complying with a correction request. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist under law where we will not provide you with access to your personal information or we may refuse to correct it. Should we refuse you access or correction to your personal information; we will provide you with a written explanation for that refusal as soon as possible.

## Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, or authorised by law, or unless you have voluntarily consented to disclose this information to any third party.

## Your Sensitive Information

We will not collect information about you without your consent and that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or afflations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. There are some exceptions to this under law, including where the collection is required by law.

## Complaints Resolutions

Please contact our office if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be considered by us through our Internal Disputes Resolution process. Once we have received your complaint, we will firstly acknowledge receipt within 24 hours and secondly respond (also in writing) within 30 days. If we need to investigate your complaint and require further

time, we will work with you to agree to an appropriate timeframe to investigate. Our complaint response will be compiled in consultation with your adviser and only after thorough investigation of all matters.

After you have received our response, should you not be satisfied you have the right to take the matter and complaint to the Australian Financial Complaints Authority (AFCA) which is a free external dispute resolution service. They can be contacted on 1800 931 678 or info@afca.org.au.

Further information on our Internal Disputes Resolution process is set out in our Complaints Management Policy which is available from our website.

## Our Website

Our website uses "cookies". Cookies are small pieces of information that allow us to identify your browser and other anonymous information while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them. Once you leave the site, any cookies are destroyed and no personal or other information about you is stored.

SPM IG's (and related entities) clients can log in to the Secure Private Client Services facility which provides access to part of our investment database, thus enabling you to view your current portfolio details and gain access to third party information not necessarily specific to your situation and further in house data and research prepared by our firm. This information available via this facility is protected by 128-256 bit encryption (dependant on user operating systems and browsers) and multi layered firewalls both at our site level and that of the hosting party of the investment data.

Our website also provides links to third party websites. The use of your information by these third party sites is not within the control of SPM IG and we cannot accept responsibility for the conduct of these organisations. Other websites may not be subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy stands, policies and procedures.

## Your Consent

By asking us to assist with your affairs (financial and otherwise), you consent to the collection, disclosure and use of the information you have provided to us for the purposes described in this Privacy Policy.

| Contact Details | |
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| Privacy Officer: | Privacy Officer |
| Address: | PO Box 233 |
| | Maroochydore QLD 4558 |
| Telephone : | 07 5479 6808 |
| E-mail: | privacy@spm-ig.com.au |