

PRIVACY POLICY

1. Introduction

McPherson & Associates Pty Ltd (referred to as 'McPherson & Associates', 'we', 'our', 'us') is bound by the Privacy Act 1988 ('Privacy Act'), including the Australian Privacy Principles ('APPs'). McPherson & Associates recognises the importance of ensuring the confidentiality and security of your information and is committed to protecting your privacy in accordance with the Privacy Act.

Further copies of this Policy are available free of charge by contacting our Privacy Officer or from our website at www.mcphersonassoc.com.au.

This Policy outlines our current policies and practices for the collection, handling, use and disclosure of information about your affairs. It also explains how to access the information we hold about you, have it corrected and/or complain if you consider us to have breached the privacy law.

By asking us to provide you with financial planning advice, you consent to the collection and use of the information you provide to us.

2. Policy Definitions

- *Disclosing information*
 - Providing information to third parties
- *Information and Personal Information*
 - Information or an opinion relating to an individual, which can be used to identify that individual
- *Privacy Officer*
 - The contact person for questions or complaints regarding our handling of your information
- *Sensitive information*
 - Information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information
- *Use of information*
 - Our use of your information

3. The Information We Collect And Hold

In order for us to provide you with our financial planning and any related services, we request from you the information required to ensure we understand your personal circumstances and lifestyle and financial objectives, and to ensure our advice is appropriate for you.

We may collect and hold a range of information about you to provide you with our services, including, but not limited to, your:

- Full name, date of birth and contact details,
- Health and wellbeing,
- Financial situation, including your personal circumstances, lifestyle and financial objectives,
- Employment details, including both existing and historical details,
- Asset, liability, income and expenditure details, and
- Any other information considered relevant to providing our services.

4. The Collection of Information

We generally collect information directly from you in the course of providing you with our services. For example, information will be collected through our application processes and forms and other interactions with you, including when you meet with a representative, visit our website, call us or send us correspondence. From time to time, additional or updated information may be collected through one or more of these methods.

We may also collect information about you from third parties, such as other professional advisers, financial and insurance product issuers and regulatory and government agencies.

We will make you aware when information is to be collected from a third party with you retaining the right to refuse us authorisation to collect information from any third party.

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

If you do not provide us with the information we request, or if you provide inaccurate or incomplete information, we may not be able to provide you with our services, or our advice and recommendations may not be appropriate for your circumstances.

Information collected and held will be treated as confidential information and sensitive information will be treated as highly confidential.

Other than in limited circumstances, we do not give you the option of dealing with us anonymously, or using a pseudonym. This is because it is illegal or impractical for us to deal with individuals who are not identified.

You are able to deal with us anonymously or using a pseudonym where it is lawful and practicable to do so. An example of this is where you phone to request our postal address.

5. Website Collection

When you browse our website, anonymous details such as the date and time of your visit; the pages and links accessed and your server address and browser used, may be logged. You are not identified personally and if this information is collected, it will only be used to improve the content and functionality of our website, and to improve our services. The operators of any third party website to which a link is provided on our website may or may not be governed by the Privacy Act.

If you choose to provide information including your name and contact details as part of an enquiry function when you visit our website, we will only use this information for the purpose provided, and provide it to the appropriate representative to respond to your enquiry.

6. Unsolicited Information

We may receive unsolicited information about you. We destroy or de-identify all unsolicited information received, unless it is relevant for the purpose of collecting information about you. 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 treat the information in the same way we hold, use and disclose your other information.

7. Who Do We Collect Information About?

The information we may collect, hold, use and disclose includes, but is not limited to, information about the following individuals:

- Clients and prospective clients,
- Employees and prospective employees,
- Visitors to our website,
- Contractors, service providers or suppliers, and
- Other third parties with whom we or our clients come into contact.

8. Why Do We Collect Information?

We collect, hold, use and disclose information about you so that we may:

- Provide you with our financial planning and taxation services,
- Review and meet your ongoing objectives,
- Provide you with information we consider may be relevant or of interest to you,
- Advise you of other services we offer and invite you to events,
- Consider any concerns or complaints you may have,
- Conduct our business and comply with relevant laws, regulations and other legal obligations, and
- Improve the services offered to you and enhance our overall business.

As a financial services organisation, we are subject to certain legislative and regulatory requirements which necessitate us to obtain information about you, including provisions of section 961B of the Corporations Act 2001.

We also collect your information for the purpose of reporting to AUSTRAC in accordance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act).

We may collect, use, hold and disclose your information for these purposes.

We may also collect, use, hold and disclose your 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 collected, used, held 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.

9. Who Do We Disclose Information To?

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

We may disclose your information to:

- Financial and insurance product issuers in the process of implementing investment and insurance products,
- Third parties you engage or we engage on your behalf, such as lawyers, brokers, consultants and business advisers'
- Related entities of McPherson & Associates,
- Agents, professional advisers or service providers we engage to carry out our functions and activities such as our Authorised Representatives, accountants and lawyers,
- Regulatory bodies, government agencies, law enforcement bodies and courts,
- Financial institutions involved in operating our business' payment system,
- Information technology companies engaged by us to service our clients, including cloud software product providers, and
- Third parties you have provided us with permission to disclose information to or as required by law.

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

In the event we propose to sell our business, we may disclose your information to potential purchasers for the purpose of them conducting their due diligence. This disclosure will be made in confidence and will be conditional on no information being disclosed being used by them.

10. Sending Information Overseas

We are unlikely to disclose information to recipients located overseas. We will not disclose your information to overseas recipients without your permission unless we have taken reasonable steps to ensure the recipient does not breach the Privacy Act or the APPs, or, the recipient is subject to a similar information privacy regime.

11. Management Of Information

We recognise the importance of securing the information of our clients.

We will take all necessary steps to ensure your information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your information is generally stored electronically in our Client Management Systems and in paper files.

In relation to information held in our Client Management Systems, we apply the following guidelines:

- Passwords are required to access the system,
- Employees have restricted access to certain sections of the system,
- Unauthorised employees are prevented from updating and editing information,
- All computers which contain information are secured electronically, and
- Printed reports containing information is limited, with hard copies of information destroyed.

Paper files are stored in secure areas, and in some cases, archived and sent to an external data storage provider for a period of time. We only use Australian storage providers who are also regulated by the Privacy Act.

It is a legislative requirement for us to keep all information and records for a period of seven (7) years. Should you cease to be a client, we will retain your information on or off site in a secure manner for at least seven (7) years. After this, the information may be destroyed.

12. Direct Marketing

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

- The 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 electing to opt out of any direct marketing activity, and
- You have not previously requested to opt out from receiving direct marketing from us.

If we collect information about you from a third party, we will only use that information for the purpose of direct marketing if you have not elected to opt out, or where it is impracticable to obtain your consent to opt out, we will provide a simple means by which you can easily opt out from receiving direct marketing from us. We 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 information for the purpose of direct marketing, or for the purpose of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. We maintain a record of individuals who have elected to opt out from receiving direct marketing material.

You may also request 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.

13. Identifiers

We do not adopt identifiers assigned by the Government, such as drivers' licence numbers, for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

14. How Do We Keep Information Accurate And Up-To-Date?

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

We encourage you to contact us if any information we hold about your affairs needs to be updated.

Where we are satisfied information collected and held is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We will not charge you for correcting your information.

15. Accessing Your Information

Subject to Privacy Act exemptions, you can access the information we hold about you by contacting the Privacy Officer. We will generally respond to a request for access in 30 days of your request. If we refuse to provide you with access to the information, we will provide a written explanation 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.

Some exemptions exist where we will not provide you with access to your information. Such exemptions include, but are not limited to, where:

- 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 is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings,

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- Providing access would reveal our intentions in relation 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, and
 - Providing access would likely 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.

16. Updates To This Policy

This Policy will be reviewed from time to time to take into consideration new laws and technology, together with changes to our operations and the business environment. We encourage you to review our website regularly for any updates to our Policy.

17. Making A Complaint

If you have any questions about this Policy, or wish to make a complaint about how we have handled your information, please contact our Privacy Officer by:

- Mail Attention: Privacy Officer
 McPherson & Associates Pty Ltd
 GPO Box 482
 BRISBANE QLD 4001
- Phone 07 3833 3100
- Email mail@mcphersonassoc.com.au

Where 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:

- Mail Director of Complaints
 Office of the Australian Information Commissioner
 GPO Box 5218
 SYDNEY NSW 2001
- Phone 1300 363 992
- Email enquiries@oaic.gov.au