

## PRIVACY POLICY

At Absolute Financial Pty Ltd, we respect our clients' right to privacy and value the confidence you place in us to safeguard your personal information. This document is a guide to the way that Absolute Financial uses and handles personal information.

### 1. What is personal information?

1.1 Personal information means any information that is specifically identified with an individual.

### 2. Why we collect personal information

2.1 Absolute Financial is a financial planning firm that provides a range of personal financial planning advice, including retail lending, insurance, funds management. The information we collect from you allow us to provide this advice successfully.

2.2 The key reason for collecting personal information is to enable us:

- a) to identify suitable financial products and strategies that will satisfy your particular requirements.

### 3. How we collect information

3.1 Absolute Financial only collects personal information by fair and lawful means. We gather information from written documents (such as an application form or client questionnaire), or verbally when we speak to our clients.

3.2 Wherever practicable, we take care to seek your consent to record your personal information.

3.3 To ensure the quality of our records, we will use our best endeavours to maintain the accuracy, currency and completeness of all personal information collected. We rely on the accuracy of the personal details provided to us and would appreciate client's assistance to contact us if any personal information is found to be inaccurate or incomplete.

## Use of information

3.4 We only use and disclose personal information for the purpose for which it was revealed to us, or related purposes that would not reasonably require your specific permission.

3.5 We do not sell, rent or trade personal information to or with any other organisations, but personal information may be used by other companies within the Group. For example, we may need to liaise with Absolute Taxation and Management.

3.6 We will only disclose personal information to parties outside the Group under the following circumstances:

a) For legal reasons, we may disclose personal information to government agencies, courts, or other statutory authorities

b) Disclosures may be made to our consultants and contractors (eg. company solicitors, financial advisers, printing companies etc.), to carry out the specific functions. In this event, we will take all reasonable steps to ensure that those third parties are in full compliance with the Privacy Act;

## 4. Security of information

4.1 We have taken all reasonable measures to protect the information in our records. Access to personal information within Absolute Financial is strictly limited to prevent any misuse, loss, modification, and unauthorised disclosure.

## 5. Access and amendment

5.1 Our clients may request access to their personal information held in our records. We will not unreasonably withhold access except under the following circumstances:

- a) providing access would pose a serious threat to any other individual;
- b) providing access would jeopardise the privacy of any other individual;
- c) where the client makes an unreasonable request for access for the purpose of creating a nuisance;

- d) providing access would unreasonably prejudice our commercial dealings with the individual;
  - e) providing access would be unlawful;
  - f) denying access is required or authorised by law; or
  - g) providing access would jeopardise an investigation of possible unlawful activity.
- 5.2 We will use our best endeavours to provide clients with the requested information in a timely manner.
- 5.3 We may seek reimbursement for providing access to this information where expenses were incurred in retrieving and collating the requested information.
- 6. Tax File Numbers**
- 6.1 For certain financial products, we are required by law to obtain your Tax File Number (TFN). The handling of TFNs is regulated under the Privacy Act and we are committed to maintaining the security of your TFN in accordance with the Tax File Number Guidelines.
- 7. Sensitive information**
- 7.1 We will only collect sensitive information about a client with his/her express consent of the customer or where the collection is compelled by law.
- 7.2 Under this clause, sensitive information is defined as information on an individual's:
- a) racial or ethnic origin;
  - b) political opinions;
  - c) religious or philosophical beliefs;
  - d) membership of any political, professional or trade association;
  - e) sexual preferences or practices;
  - f) criminal record; or
  - g) health.
- 8. Compliance and review**
- 8.1 With our commitment to deliver the highest standard of services to our clients, we have established strict governance procedures, including employee training and ongoing audit provisions.
- 8.2 We will review and update this Policy as necessary and in compliance with all relevant industry standards and statutory requirements.
- 9. Complaints**
- 9.1 We continually strive to ensure our clients' satisfaction and will use our best endeavours to resolve any complaints in a timely manner.
- 9.2 Where complaints cannot be resolved to the complainant's satisfaction within a reasonable time, the complainant may refer the matter to the Office of the Privacy Commissioner. Contact details can be found at [www.privacy.gov.au](http://www.privacy.gov.au)