PROSPERITY ALLIANCE PRIVACY POLICY

March 2020

OUR COMMITMENT

At Prosperity Alliance Pty Ltd (Prosperity Alliance) we recognise that your privacy is very important. Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and Australian Privacy Principals (APPs) Privacy Amendment (Enhancing Privacy Protection) Act 2012 which replace the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000.

Our Privacy Policy sets out our commitment to those principles. We require all our staff and our associate company Prosperity Alliance Wealth Advisors Pty Ltd to adopt our Privacy Policy. Prosperity Alliance Wealth Advisors also has its own Privacy Policy which is consistent with our Privacy Policy and contain more specific compliance and/or practice related details.

A summary of the Australian Privacy Principles is available by contacting our office.

ANONYMITY AND PSEUDONYMITY

You have the option of not identifying yourself or using a pseudonym when dealing with Prosperity Alliance Pty Ltd and its associate company Prosperity Alliance Wealth Advisors Pty Ltd unless it is impracticable for us to deal with you in this manner. If you elect to not identify yourself, we will inform you if it is impractical in those circumstances.

WHAT INFORMATION IS COLLECTED AND HELD

Clients or Potential Clients

The information we collect includes your name, address details, date and place of birth, telephone numbers, email address and other information specific to the services provided. This can include, but is not limited to, tax file number, Australian business number, bank account, credit card details, business and financial information. This information is used in the provision of accounting, taxation and other professional financial services.

Website and Client Portal Users

When using our website, client portal or communicating with us via social media networks including but not limited to Facebook, Instagram, LinkedIn,Twitter and Google, you may provide us with personal information. We will use all reasonable measures to protect any such information from being used for any other purpose, other than the purpose for which it was intended.

As well as the information you specifically provide above, we may gather website statistics to collect information about the number of visitors coming to the site and their location. No identifying information is collected during this process. We use this information for statistical purposes only.

We may also use 'cookies'. Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data about a user's preferences. This allows the website to deliver a page tailored for a particular user or the page itself can contain some script which is aware of the data in the cookie and so is able to carry information from one visit to the website (or related site) to the next.

HOW INFORMATION IS COLLECTED

If it is reasonable and practical to do so, we will collect personal information directly from the individual(s) concerned after receiving their consent. The information collection and the confirmation of consent may be made through emails, over the telephone, over the internet or in person.

We may need to collect personal information from a third party, such as the Australian Taxation Office, ASIC, your bank, your financial adviser, your employer, your lawyer or other sources as required.

We do not collect personal information without your consent.

When you provide personal information to us about other individuals we rely on you to have made them aware that you will or may provide the information to us and the relevant purposes for which we will use this information. You also need to inform them how they can access this information.

DOCUMENT SECURITY AND STORAGE

Your personal information is maintained securely and is generally held in your client file. Information may also be held in a computer database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

ACCESS AND CORRECTION

You may at any time, request access to your personal information by contacting your adviser or an authorised representative of Prosperity Alliance Pty Ltd.

We will (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 with access to your personal information if:

- (a) providing access would pose a serious threat to the life or health of a person
- (b) providing access would have an unreasonable impact on the privacy of others
- (c) the request for access is frivolous or vexatious
- (d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- (e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- (f) providing access would be unlawful
- (g) denying access is required or authorised by or under law
- (h) providing access would be likely to 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

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

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. If 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 inaccuracy or incompleteness and we will, if we agree that the information requires correcting, take all reasonable steps to amend the information.

We will endeavour to respond to any request for document 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.

If your personal information is solely collected by Prosperity Alliance Wealth Advisors for its professional engagement with you, Prosperity Alliance Wealth Advisors will assist you with your request according to its own dedicated Privacy Policy.

IDENTIFIERS

Generally, we will not adopt or use an identifier (eg, TFNs, Medicare numbers, etc) that has been assigned by a government agency and may be provided by you to group, sort or identify people. We will only disclose the information to another entity where you authorise that disclosure or where we are required to do so by law (e.g. tax File Numbers to product issuers or trustees of superannuation fund).

INFORMATION NOT COLLECTED OR COMMUNICATED IN PERSON

We take all reasonable steps to ensure that all personal information we hold is secure from any unauthorised access, misuse or disclosure, however we cannot guarantee that unauthorised access will not occur especially when information is collected and/or transferred online or over the phone with involvement of third party providers of services and/or products which include but are not limited to physical data/internet networks, office and professional software, social media platforms/software applications, services of telephone/data communications and services of website hosting.

Prosperity Alliance's web site may contain links to other web sites and Prosperity Alliance also have engaged social media networks to host our social media accounts or business pages. Those operators may or may not adhere to a privacy policy or be governed by the Australian 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, newsletters 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 you wish to update your registration details or decide, at any time, that you do not wish to receive any further information from us, you can give effect to this by following the instruction on the website or by contacting us directly.

PRIVACY COMPLAINTS

This Privacy Policy and the legislation which governs it has been established to promote and protect your privacy rights. If you believe your personal information has been mishandled or there has been a breach of privacy, you may lodge a complaint directly by contacting us at contact@prosperityalliance.com.au or by phone at 0422 966 698. Your complaint will be thoroughly investigated and responded to within 5 working days. We endeavour to satisfactorily resolve all complaints and encourage our clients to resolve complaints directly with our organisation, however, if you are unhappy with our response, you are entitled to escalate your complaint to the Office of the Australian Information Commissioner.

CHANGES TO THIS PRIVACY POLICY

We reserve the right to review and amend this Privacy Policy in accordance with legislative changes and our business requirements.

CONTACT US

If you have any further enquiries regarding privacy issues or require further information relating to our Privacy Policy, please contact our Privacy Officer, Eugene Serravalle.

Prosperity Alliance 68-72 York Street, South Melbourne VIC 3205

Telephone: (04) 2296 6698

Email: contact@prosperityalliance.com.au

ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the website of the Australian Information Commissioner at www.oaic.gov.au