Privacy Policy ("Policy") – Wealth Initiatives Pty Ltd

This Policy was last updated on 08 May 2023.

Wealth Initiatives Pty Ltd 612 640 641 ('we', 'our', 'us', is bound by the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

While we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact out Privacy Officer in the first instance:

Privacy Officer Contact: Michael Farmer Email: Michael.farmer@businessi.com.au Postal address
Attention: Privacy Officer
Wealth Initiatives
20D William Street Norwood SA 5067

Our website contains links to other websites. When you click on a link to another site, you are no longer subject to this Policy.

1. What types of information do we collect and why?

In the course of providing our goods and services to you, we collect personal and other information about our clients and how they interact with us, our goods, and our services. We collect personal information through a number of mechanisms, including:

- 1.1 **Collection from you:** we collect and store information you provide directly to us (either in person, by email, by phone, or by any other direct means) in order to deliver our goods and services. This includes:
 - <u>Contact information:</u> such as your name, address, email address, telephone number;
 - <u>Personal information:</u> such as date of birth and driver's licence details:
 - <u>Financial and credit</u> <u>information</u>: such as your

payment information (credit card, bank account, etc);

- <u>Business details:</u> such as your Australian Business Number;
- 1.2 **Automatic:** we use cookies (small text files stored on your devices that provide us with information such as your internet protocol (IP) address, server information, internet service provider, and information on how you interact with our website) or similar technologies to collect data and other services that allow us to understand how you use our online media.

This information is not linked to you personally.

If you opt-out of third party tracking technologies or elect to prevent the use of cookies, this may result in the loss of Website and/or App functionality, restrict your use of the Website and / or App or delay or affect the way in

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which the Website and / or App] operates.

- 1.3 **Device**: if you use our services or interact with us through a mobile device, we receive technical information about your device, numbers that identify the device and your location information. This information is associated with you.
- 1.4 **Communications**: when you communicate with us, we collect information such as your contact details (such as email address or phone number). You can elect to not receive communications from us by contacting our Privacy Officer.

We also engage third party services that provide us with information about how you interact with some communications we distribute.

- 1.5 **Digital platforms**: if you access our goods or services by connecting a social media login (such as Facebook or Google) we collect information derived. associated or connected with that platform where permitted by the platform's terms of service. Any information we collect from social media, or other online platforms. is collected accordance with that platform's terms and conditions.
- 1.6 Through other sources: where necessary, we also collect your information from publicly available records. This include information relating to an individual's credit worthiness and other information from credit providers. subject to legal restrictions. Where appropriate and necessary to do so we collect information from public records such as those maintained by the Australian Securities and Investments Commission, Australian Financial Security Authority (such as the Personal Property Securities Register), and

land titles offices in each state. We may do this where it is unreasonable or impractical to collect this information from you.

If you have previously applied for a position with us we may have received your personal information from third parties such as recruiters or external websites. We use the information we receive to contact you about any potential opportunities or to evaluate your candidacy.

1.7 **Sensitive Information**

We collect information considered to be sensitive information in the Privacy Act. We collect sensitive] in order to provide life insurance other financial advice.

We will only collect this information directly from you or where we have consent to collect the information from a third party.

You have the option of not identifying yourself or interacting with us using a pseudonym. However, this may not be practicable when engaging our services.

2. How we use your information

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related to that primary purpose if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of providing financial advice.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

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2.1 Related Party and Group Transfers

We are part of a larger group of companies called Business Initiatives and as such we provide your information to other entities within the group of companies. This transfer of information is compliant with s 13B of the Privacy Act.

2.2 **Disclosure** of personal information to third parties

We may disclose your information to third parties who assist us in providing, managing and administering our goods and services. We will also disclose your personal information where such disclosure is required by law.

We disclose your personal information to third parties that:

- Manage and enhance our customer database;
- Process information;

- Assess your interest in our products or services;
- Conduct customer research or satisfaction surveys;
- Send marketing information to you on our behalf];
- Other organisations listed as trade references in a credit application including]; and
- Other purposes related to the above.

We do not sell or license your information to third parties.

2.3 **Disclosure of credit** information to third parties

We do not disclose your credit information to any credit reporting bodies.

3. How do we store and secure the information we collect?

We store your personal and credit information as physical files in a secured area or on our electronic data base system and on computers with appropriate back up and security systems].

3.1 Security and management of personal information

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised access, modification or disclosure. We do this by:

- putting in place physical, electronic and procedural safeguards in line with industry standards;
- requiring any third party providers to have acceptable security measures to keep personal information secure;
- limiting access to the information we collect about you;
- imposing confidentiality obligations on our employees;
- only providing access to personal information once proper identification has been given; and

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While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you in accordance with our obligations under the Privacy Act.

If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

3.2 **Sending information overseas**

We do not disclose or store personal information overseas.

4. How to access and control your information?

4.1 Accessing the information we hold about you

Under the APPs you may be able to obtain a copy of the personal information that we hold about you. To make a request to access this information please contact us in writing. We will require you to verify your identify and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

We may charge a fee to cover the costs of verifying your application, and retrieving, reviewing and copying any material requested.

4.2 Updating your personal information

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact our Privacy Officer if you believe that the information we hold about you requires correction or is out of date. We endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to credit information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

5. **Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Office with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a compliant, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001

For more information on privacy see the <u>Australian Information Commissioner's website</u>

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