



Privacy Policy

Version 1 - 16 July 2026

About this policy: This policy explains how Neilson & Associates Pty Ltd ABN 90 140 847 883 trading as Godfrey Pembroke manages personal information in connection with the financial advice services provided by our authorised representatives.

Overview

The privacy of your personal information is important to us. We are required to comply with the Australian Privacy Principles and will comply with those principles as well as other applicable laws affecting your personal information.

This privacy policy outlines how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes, and how we collect, hold, use and disclose that information.

Collecting your personal information

Your personal information will be collected and held by us, as corporate authorised representatives of Godfrey Pembroke Group Pty Ltd, an Australian Financial Services Licensee, for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- protecting our business and other clients from fraudulent or unlawful activity;
- complying with relevant laws, regulations and other legal obligations;
- helping us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested; and
- any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers. Please contact us via email at tony.bingham@godfreypembroke.com.au or phone 0423 633 734. We will process your request as soon as practicable.

To enable your financial adviser to provide you with financial advice that is suitable for your investment objectives, financial situation and particular needs, we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or provide written material. We may need to collect personal information from third parties, such as your accountant or others whom we believe you have authorised to provide information to us.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information unless the personal information is relevant to our purposes for collecting personal information.

How your personal information is held

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We take reasonable steps to ensure that the personal information we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures we have adopted include secure storage of personal information, secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

Using and disclosing your personal information

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. The types of service providers and other third parties that may be provided with your personal information are:

- our Licensee, Godfrey Pembroke Group Pty Ltd, which provides financial planning software and compliance support services;
- other financial advisers and organisations involved in providing the financial advice you have requested, such as fund managers and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- a superannuation trustee or other product provider who you have authorised to deduct advice-related costs from your superannuation or investment fund and who has requested to review a copy of your Statement of Advice to satisfy their legal obligations;
- organisations that assist in operating a financial planning business, such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business, or due diligence procedures before any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with those purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure, such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Organisations outside Australia

In order to provide you with our services, we may need to share your information with organisations outside Australia. This may include software, cloud, document, financial planning, accounting or administration providers such as:

- Microsoft (US)
- Google (US)
- Amazon Web Services / AWS (US)
- Docusign (US)
- Iress /Xplan (Australia)
- Xero (New Zealand)
- BGL (Australia)
- Practice Ignition (Australia)
- Asana (US)

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed above. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

In order to keep our costs competitive, our Practice uses specialist business support resources that are located in the Philippines. The organisation we have contracted to support our business have confirmed to us they will adhere to the Australian Privacy Principles when dealing with your personal information. They will not contact you or share your information with any other party unless they have your express approval. They have taken a number of steps to ensure the security of your data, including:

- Completing due diligence and background checks upon recruitment.
- Supervising all staff in a dedicated work area that requires security access.
- Use of specialist password protection software so that staff never require your external log-in details.
- No printers or USB ports are connected to staff PC terminals, and use of portable devices such as smartphones or iPads are prohibited from the designated workspaces, restricting downloads.
- Surveillance software that can be used to track activities and emails.
- Independently certified to ISO/IEC 27001:2022 for Information Security Management Systems (ISMS).

We will not send personal information to recipients outside Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- you have consented to the disclosure.

Accessing your personal information

You can gain access to the personal information that we hold about you. This is subject to exceptions allowed by law, such as where providing access would have an unreasonable impact on the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access, please contact us using the details below.

Correcting your personal information

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information we hold is not accurate, complete or up-to-date, please contact us using the details below and let us know what information is incorrect.

If we agree that the personal information requires correction, we will take reasonable steps to do so. If we do not correct your personal information, we will provide you with the reasons for not doing so. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

Contacting us and privacy issues

You can obtain further information on request about the way in which we manage the personal information that we hold. You can also raise any privacy issue with us, including a complaint about privacy, by contacting us using the details below. We are committed to working with you to resolve a complaint involving your personal information.

Contact Person	Tony Bingham
Practice	Neilson & Associates Pty Ltd trading as Godfrey Pembroke
Email	tony.bingham@godfreypembroke.com.au
Phone	0423 633 734

If you still feel your issue has not been resolved to your satisfaction, you can escalate your privacy concerns to:

Office of the Australian Information Commissioner

Website: [oaic.gov.au/privacy](https://www.oaic.gov.au/privacy)

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Australian Financial Complaints Authority

Website: [afca.org.au](https://www.afca.org.au)

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.