

Privacy Policy

Bridgewater Partners Pty Ltd ACN 650 957 190 (**Bridgewater Partners, we or us**) is committed to protecting your privacy and complying with its obligations under the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**) in respect of that information. This Privacy Policy explains how and why Bridgewater Partners collects your personal information, how we use it and what controls you have over our use of it.

Please read this policy carefully. Your use of any part of our website, and associated paraplanning and advisory services (**Services**) will constitute your consent to the collection, transfer, processing, storage, disclosure and other uses of your personal information in accordance with this Privacy Policy. If you do not agree with the terms and conditions of this Privacy Policy, please do not use our Services.

For the purposes of this Privacy Policy, "personal information" is any information which personally identifies you or may reasonably be used to personally identify you.

Collection of your personal information

The personal information that we collect and hold about you depends on your interaction with us. We collect and hold various types of personal information directly in connection with the provision of our Services, including:

- your name and contact details, including your e-mail address, mailing address and telephone number;
- identity data including your company and business name and number;
- financial information, including banking, billing or other payment information;
- usage data including information about how you use our Services;
- marketing and communications data including your preferences in receiving marketing from us and our third parties and your communication preferences; and
- any other information necessary for or incidental to the provision of the Services.

Quality and integrity of personal information

You are responsible for the quality, accuracy, and integrity of any information provided to us, including any information to be incorporated in the Services. If the personal information you provide to us (including, if applicable, any information from your clients) is incomplete or inaccurate, we may be unable to provide you or your organisation with the services you, or they, are seeking.

Use and disclosure of your personal information

We will ask for your consent before we use or share your personal information for any purpose other than for the reason you provided it or as otherwise provided by this Privacy Policy. We will generally collect, use and hold your personal information if it is reasonably necessary for or directly related to the performance of our functions and activities and for the purposes of:

- providing Services to you;
- communicating with you about your use of the Services or any changes to the Services;
- making payments to you in connection with our Services;
- facilitating our internal business operations, including the fulfilment of any legal requirements;
- analysing our Services and customer needs with a view to developing new or improved services;

- complying with our legal or regulatory obligations, including to authorised regulatory bodies; and
- for any other purposes for which you have consented to from time to time.

You expressly consent and authorise us to collect, use and disclose your personal information for the above purposes. You may at any time refuse to provide us with your personal information or withdraw your consent for us to collect, use and disclose your personal information for the above purposes; however, this may result in us being unable to provide the Services to you.

If you choose to provide personal information belonging to a third party (such as your clients), we assume that you have the third party's fully informed consent to do so, and that in disclosure complies with your obligations under the Privacy Act.

If we engage with third party contractors to perform services for us which involves handling your personal information, such as processing payment transactions, we take reasonable steps to ensure that these third parties maintain the confidentiality of your information and are prohibited from using that information except for the purposes for which it was supplied.

Security of your personal information

Bridgewater Partners is committed to protecting the security of your personal information. We use a variety of security technologies and procedures to help protect your personal information from unauthorised access, use, or disclosure. We store the personal information you provide on computer systems with limited access, that are located inside our controlled facilities. When we transmit highly confidential information over the internet, we protect it through SSL.

Whilst we adopt all protections over your personal information within our control, we cannot guarantee the security of information transmitted via the internet. As such, transmission of personal information via the internet is at your own risk and we cannot be held responsible for the security of such information.

Direct Marketing

We will only send you direct marketing communications and information via email about our Services with your consent. You may opt-out of receiving marketing communications from us by contacting us at the details below or by using opt-out facilities provided in our communications. We do not provide your personal information to other organisations for the purposes of their direct marketing and will not sell, rent or lease our customer lists to third parties.

Overseas disclosure

It is unlikely that we will need to disclose your personal information to an overseas recipient or otherwise store your personal information overseas. If we are ever required to do so, we will obtain your informed consent.

Using our Website and cookies

To improve your experience on our website, we may use 'cookies': small data files that are served by our website and stored on your device. These are used by us or third parties for a variety of purposes including to operate and personalise the website. Cookies may be used for recording preferences, conducting internal analytics, conducting research to improve our offering, assisting with marketing and delivering certain website functionality. You may refuse to accept cookies by selecting the appropriate setting on your internet browser. However, please note that if you do this, you may not be able to use the full functionality of our website.

Third party sites

For your convenience and to improve the usage of the Services we may insert links to or utilise the services of third-party websites and applications for which this Privacy Policy does not apply. Bridgewater Partners is not responsible for those third party websites, applications or resources. If you access such websites, applications or resources, you do so at your own risk and we make no representations or warranties regarding third parties'

privacy practices. We encourage you to read the privacy statements/policies of every website, application or resource you use.

Data Retention

We will only retain your personal information for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal information for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal information, we consider the amount, nature and sensitivity of the personal information, the potential risk of harm from unauthorised use or disclosure of your personal information, the purposes for which we process your personal information and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

Where we anonymise your personal information (so that it can no longer be associated with you) for research or statistical purposes, we may use this information indefinitely without further notice to you.

Accessing or correcting your personal information

We are committed to maintaining accurate, timely, relevant and appropriate information. Where requested, we will provide you with a copy of the personal information that we hold which relates to you, provided that the request is made in accordance with the APPs. We will also update any inaccurate information about you if you inform us that the information is inaccurate, incomplete, irrelevant or misleading.

There are no charges for requesting access to or the correction of your personal information, however if the volume of information we hold is excessively large, we reserve our rights to charge you any reasonable administration fees (including fees for photocopying) associated with your request. You can contact our privacy officer regarding access to or correction of your information by any of the following methods:

Email: general@bridgewaterpartners.com.au

Post: Level 38, 345 Queen Street, Brisbane QLD 4000

Phone: 0443 226 784

We will respond to those requests within 30 days in accordance with our obligations under the Privacy Act. If we refuse a request to access or correct personal information, where reasonable, we will provide you our reasons for doing so and information about your ability to complain about such refusal.

In order to protect the confidentiality of your personal information, details of your information will only ever be passed on to you where we are satisfied that the information relates to you. Accordingly, we may request documentation from you which confirms your identity before passing on any personal information.

Changes to this Privacy Policy

Bridgewater Partners will occasionally update this Privacy Policy to reflect company and customer feedback. If we do so, the latest version of our Privacy Policy will be available on our website and will apply to all your personal information held by us at that time. Bridgewater Partners encourages you to periodically review this Privacy Policy to be informed of how Bridgewater Partners is using, collecting, protecting and disclosing your personal information.

Further information

If you require any further information or have any queries regarding our Privacy Policy, please contact our privacy officer at the details set out above.

Should you wish to read more information on the Privacy Act, we recommend that you visit the website of the Office of the Australia Information Commissioner at www.oaic.gov.au.