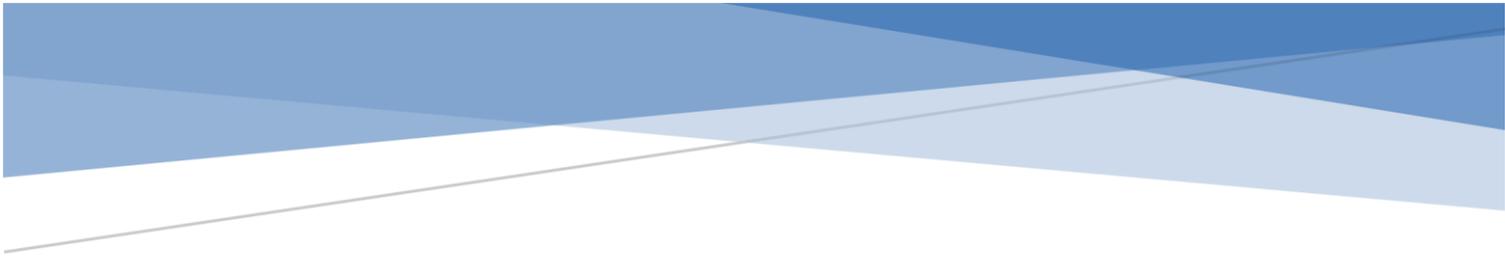


LICENSEE STANDARDS

Privacy Policy and Data Security

Version 1.1 March / 2020

MAKE YOUR OWN MARK WITH SPARK



Summary

This Privacy Policy outlines how Spark Financial Group manages the personal information about clients it may collect, hold, use and disclose. Spark Financial Group are committed to protecting your privacy and the confidentiality of your personal information in accordance with the Privacy Act 1988 (Privacy Act) and the Australian Privacy Principles, which this policy is based on.

The purpose of this policy is to cover the Privacy and Data security of information managed through Spark Financial Group and its aligned Panel partners

Privacy Policy for Spark Financial Group Pty Ltd, Spark Advisors and Spark Advisory (“SFG”)

1 Policy Statement

Spark FG recognises the trust you are placing in us by providing your personal details and we are committed to the protection of your personal information. This policy applies to and is adopted by our employees, related entities and associated companies and contractors which are subject to the Privacy Act 1988.

2 What personal information we generally collect and why:

We collect information in a number of different ways including directly, indirectly and through third parties including:

- Via our website (please refer to our website terms of use);
- Via our forms and requests for our services;
- Via email;
- Via social media;
- Over the phone; and
- During our financial planning advice process/data collection.

When collecting your personal information, we may ask you to provide the following information:

- Your name, address, telephone number and email address;
- Credit card or banking details;
- Tax file no or ABN/ACN Number

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- Feedback in relation to your experience with us;
 - Your asset and liability information; and
 - Your superannuation and insurance details and other financial details.

If you provide us with direct debit or direct credit details, we will only disclose those details to our bank to facilitate the provision of that service.

We collect personal information so we can provide our services and goods to you. In addition, we may utilise this information to communicate news, promotional offers or special events to you or for marketing, research, planning and product development purposes.

This information is used to assist the conduct of our business, to provide and market our services, to communicate with you and, most importantly, to help us manage and enhance our services for you. By providing consent to receive these communications from us you are acknowledging that the consent will remain current until you advise us otherwise in writing.

You can opt out at any time by contacting our Privacy Officer or by unsubscribing to our commercial electronic messages as set out below.

3 Junk mail or unsolicited email

You will only receive emails from us if:

- You subscribe to our email newsletters. Our email newsletters will keep you informed of the latest offers, current promotions, news and events. If you no longer wish to receive email newsletters, you may unsubscribe by clicking the 'unsubscribe' option at the bottom of our newsletter emails;
- You request information about our services when you choose to contact us. You will not be added to a mailing list of any kind and will only receive e-mails related to the matter that you have contacted us about;
- They are otherwise relevant to the reasons for which we hold your email address, where we are permitted to do so by law.

SFG will destroy information if the information was not lawfully collected by us, and/or by written request by you.



4 Suppliers

If you, or a company you work for, supplies goods or services to us, we may collect personal information about you in connection with the provision of those goods or services, either directly from you or from that company. This information may include your name, date of birth, contact information, and any other information you provide. This information will be used for the purposes of managing the provision of those good or services only.

5 Other information we collect

We may also collect the following information from you:

- The fully qualified domain name from which you accessed our websites, or your IP address;
- The date and time you accessed each page on our websites;
- The URL of any webpage from which you accessed our websites (the referrer);
- Cookies which track your visits to our web sites; and
- The web browser that you are using and the pages you accessed.

We use this information so that we can tell which pages are the most popular and where people spend most of their time on our website. We use this information to improve our website and our services delivered to you. In some circumstances we may collect personal information about an individual from a third party, for example, to analyse traffic at our website. If this information is linked with personal information we already hold about you (as set out above), this new information will be treated as personal information and will be handled in the same manner as the personal information to which it has been linked.

6 Are we likely to disclose your personal information overseas?

We may disclose your personal information to the following overseas recipients:

- Other trusted companies or individuals who assist us in providing services or who perform functions on their behalf (such as third-party service providers and specialist consultants) via our approved Panel of providers which can be made available to you upon request. We also ensure that these providers adhere to the privacy and data security requirements set out in standards by us

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- Our preferred panel of providers are updated on a regular basis and a list can be made available to you upon request
 - Spark FG and all external providers are required to maintain an **AS/NZS ISO/IEC 27001** certification
 - We may also disclose your personal information to anyone else to whom you authorise us to disclose it; and
 - Anyone authorised by law.

7 How your personal information is stored and kept secure

All personal information collected by us is held securely on a secure computer storage facility or in printed form. This information is only made available to our staff, contractors and third parties to a level that is necessary for them to perform their duties, and in accordance with the terms as set out in this Privacy Policy.

We will use all reasonable endeavours to keep your personal information in a secure environment, however, this security cannot be guaranteed due to the nature of the internet. We will take reasonable steps to protect personal information held from misuse, loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records.

When your personal information is no longer required and/or SFG are no longer legally required to retain it, we will take reasonable steps to destroy it. These measures are designed to assist in your personal information not being accessed by unauthorised personnel, lost or misused. If you reasonably believe that there has been unauthorised use or disclosure of your personal information, please contact us immediately (contact details below).

8 Accessing your information

National Privacy Principle 6 of the Australian Privacy Act 1998 (Cth) allows you to get access to, and correct, the personal information we hold about you in certain circumstances.

In order to maintain the security of your personal information we may require you to provide proof of your identity before discussing any personal information and we may ask you to specify what information you require. Ways in which we may ask you to provide proof of identity may include the following:

- Certified Photo Identification (for example, passport, drivers licence etc.);

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- Providing date of birth, address, telephone number or other particulars pertaining to your identity; and
 - Providing passwords or codes.

All reasonable steps are taken by us to ensure that your personal information held by us is accurate, complete and up to date. If you believe that any of your personal information is inaccurate, please contact us and subject to the exceptions set out in the Privacy Act 1988, you may seek access to and correction of the personal information which we hold about you and we will take all reasonable steps to correct it within a reasonable timeframe.

9 How you can make a privacy related complaint?

If you have any questions about privacy-related issues or wish to complain about a breach of the Australian Privacy Principles or the handling of your personal information by us, please contact us. We may ask you to lodge your complaint in writing. Any complaint will be investigated by our Privacy Officer and you will be notified of the making of a decision in relation to your complaint as soon as is practicable after it has been made (usually within 30 days). If you are not satisfied with our response, you can refer your complaint to the Office of the Australian Information Commissioner (details below).

10 Changes to our privacy policy

This privacy policy relates to our current privacy standards. We may periodically amend our Privacy Policy in accordance with the Privacy Act 1988 and other relevant laws. It is your responsibility to ensure you understand our current Privacy Policy. The most current version of our Privacy Policy is located on our website and can be obtained by contacting our Privacy Officer.

By using or subscribing to our services or by purchasing our products without written objection, you agree to us using your personal information in accordance with the terms of our Privacy Policy.

11 Questions or Complaints

Should you have any questions or complaints about our Privacy Policy, please contact us:

Privacy Officer Spark Financial Group Pty Ltd Level 1, 168 - 170 Bay St Brighton VIC 3186

E: info@sparkfg.com.au

For more information on privacy in Australia, please visit the Australian Commonwealth Government's Office of the Australian Information Commissioner's website at www.oaic.gov.au.

