GOLDSBOROUGH
FINANCIAL SERVICES PTY LTD

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# Privacy Policy

## OUR COMMITMENT

The Privacy Amendment (Enhancing Privacy Protection) Act sets out a number of Australian Privacy Principles (APPs). It is Goldsborough Financial Services's (Goldsborough's) aim to both support, and ensure we comply with, these principles.

We believe that this Statement will address any potential concerns you may have about how personal information you provide us is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request about the way we manage the personal information we hold by contacting us in one of the ways set out at the end of this document.

## DEALING WITH US ANONYMOUSLY

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

## COOKIES

Our web site uses cookies which allows us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not.

## COLLECTION

As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning advice service is dependent on us obtaining certain personal

information about you, including:

(a) Details of your financial needs and objectives;
(b) Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
(c) Details of your investment preferences and aversion or tolerance to risk;
(d) Information about your employment history, employment circumstances, family commitments and social security eligibility;
(e) Information about you that is needed to meet requirements with respect to the Anti-Money Laundering and Counter-Terrorism Financial Act 2006;
(f) Any other information relevant to your needs.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give you. Furthermore if we are unable to collect sufficient information to ensure appropriate advice pursuant to the requirements of the Corporations Act and Rules of Professional Conduct of the Financial Planning Association (FPA) we may elect to terminate any agreement with you.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. You have the right to refuse us authorisation to collect information from a third party. We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested.

**USE AND DISCLOSURE**

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record. This is subject to some exceptions including: if the collection is required by law; and when the information is necessary for the establishment, exercise or defence of a legal claim.

Personal information will be treated as confidential information and sensitive information will be treated as highly confidential.

We will not use or disclose Personal Information collected by us for any purpose other than:

(a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
(b) where you have consented to such disclosure; or
(c) where the APP authorise use or disclosure where required or authorised under law., in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

In certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number. We do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to a third party.

As part of our operations some uses and disclosures of your information may occur outside your State or

Territory and/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

We may disclose your personal information to organisations outside of Goldsborough. The organisations to which we disclose information may include:

- compliance consultants may view client files and documents to ensure our representatives are meeting our compliance standards;
- paraplanning contractors, administrative contractors or temporary staff to handle workloads during peak periods;
- mailing houses;
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers to maintain, review and develop our business systems, procedures and infrastructure including testing our upgrading our computer systems;
- government and regulatory authorities and other organisations, as required or authorised by law, for example, to government or regulatory bodies for the purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.
- another representative of Goldsborough Financial Services if necessary to provide you with a timely service;
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets or our business;
- A new owner of our business that will require the transfer of your personal information.

**Note: These organisations will be required to maintain confidentiality**.

We may engage third party contractors to assist in the provision of our services to you who require some of your personal data to perform the service, for example an email mailing house. These third parties may store some of this data overseas. We will take reasonable steps to ensure the recipient does not breach the APPs.

We may also use the information in a way that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed. From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. We may only use sensitive information about you for direct marketing once we have obtained your consent.

If, at any time, you do not wish to receive this information any more, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a register for those individuals not wanting direct marketing material.

## SECURITY

We will at all times seek to protect personal information from misuse, unauthorised access, modification, disclosure or loss. Your personal information is held in a client file and on our computer database. Access to clients files is limited to authorised personnel and access to computer based information is protected by individual passwords. Our premises are locked and alarmed outside of business hours.

In the event that you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off site storage facility for a period of at least 7 years in order to comply with legislative requirements, following which time the information will be destroyed.

## ACCESS AND CORRECTION

If you ask, we will tell you what personal information we hold about you, and what we do with it. Upon request we will provide access to you by allowing an inspection of your personal information in person, or by providing copies or a summary of relevant documents, depending on what is most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will be disclosed to you prior to providing you with the information.

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- Inform us of any errors in your personal information as soon as possible; and
- Update us with any changes to your personal information as soon as possible.

If you can show us that the personal information we hold about you is inaccurate, we will take reasonable steps to correct it in a timely manner.

APP allows that in certain limited circumstances we may refuse access to your personal information. Examples include where a request is frivolous, or the information relates to existing or anticipated legal proceedings between us, or where providing access would be unlawful. In the event that we refuse you access to your personal information, we will provide you with an explanation of our reasons in writing.

## COMPLAINTS RESOLUTION

We are committed to providing our clients, and other parties whose personal information we hold, a fair and responsible system for the handling of their complaints. If at any time you have any complaints in relation to privacy, please contact our Privacy Officer by one of the methods referred to on the front page. We will seek to address any concerns that you have through our complaints handling processes.

If you are unhappy with our response and wish to take matters further you may refer your concerns to the Office of the Australian Information Commissioner.

## CONTACT US

If you would like any further information from Goldsborough about this Statement or our privacy policy generally please contact our Privacy Officer at one of the reference points shown on the front page. We suggest you check our website regularly for any updates to our Privacy Policy, or you may contact us for a copy.

## ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at http://www.oaic.gov.au/privacy