

# Privacy Policy

DP Wealth Advisory Pty Ltd ACN 107 237 196, its subsidiaries and affiliates in Australia (together as “DP Wealth Advisory”, “we” or “us”) are committed to protecting and managing your personal information in accordance with the Australian Privacy Principles (APPs) established under the Privacy Act 1988 (Cth) (Privacy Act).

This document is referred to as our Privacy Policy, and it sets out our policies for managing an individual’s personal information (including sensitive information, such as tax file numbers), including how we collect, use, hold, store and disclose your information.

Broadly speaking, when we are referring to personal information, we are referring to information or an opinion about you, or information that is reasonably recognisable as you. This may include information or an opinion about you that may or may not be accurate, and whether the information or opinion is recorded in a hardcopy form or not.

Additionally, when we refer to sensitive information, we are referring to certain personal information that is more sensitive and may include health information or details which relate to hardship. Sensitive information is afforded a higher level of privacy protection. It requires us to obtain your consent before collecting this type of information.

When we refer to health information, we are referring to certain information or opinions about a person’s physical, mental or psychological health or disability, that is also personal information – whether in writing or not. This includes information or opinion about a person’s health status and medical history, immunisation status and allergies, as well as counselling records.

his Privacy Policy applies to your personal information and sensitive information regardless of how we collect it from you. Through submitting information to us or accessing and using our websites or social media platforms, you are providing your consent to DP Wealth Advisory using and disclosing your personal information in the ways set out in this Privacy Policy.

## **About Us**

DP Wealth Advisory is Australian based and offers a range of services in the financial and investment sector. DP Wealth Advisory offers services such as providing general and personal financial advice through financial planning services and also offering investments and securities recommendations.

Please contact us if you would like a full list of the companies which comprise DP Wealth Advisory and which are subject to this Privacy Policy.

## **What Information We Collect**

We only collect personal information (and sensitive information) that is necessary for, or related to, conducting our business, assessing and managing our clients and business needs or for one or more of our functions or activities.

Under Anti-Money Laundering and Counter-Terrorism Financing federal legislation (also known as the AML/CTF Act and Rules), we may be required to take extra steps to identify you and 'know our customers' (which is a term used under the AML/CTF Act and Rules). This process allows verification of your personal information and which means that it must be updated regularly to remain current.

Furthermore, our business and our advisors hold ethical and professional duties under the Code of Professional Practice through the Financial Planning Association of Australia (known as the FPA) to collect sufficient information to ensure appropriate financial and investment advice and recommendations can be provided to our clients.

The types of information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us, and may likely include:

Contact Information & Personal Data: your name, date of birth, age, gender, address, email address, telephone details and tax file numbers. Payment Details: credit card, bank account details, and billing information to complete purchases. Financial Details: your financial details and occupation, which may include budget information, wages/salary information, and general expenditure. We will likely require more comprehensive details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation.

Health Information: if you intend to use our services or become a client of ours and where your health status and information may require to be considered.

Identification Documents: your driver's licence, passport or other photographic identification documents.

Employer & Profession: your professional details and information about your employer of an organisation that you represent.

Cookies & Other Device Information: your session cookies and persistent cookies when you visit our website, your device type, browser type, Internet Protocol (IP) address, your URL information, the date and time (including time zone) of your visit, the pages you have accessed on our websites and third party websites, your software and hardware information concerning your mobile device or computer.

Cookies that we place may be removed by following instructions that are provided by your browser.

Interaction & Behavioural Information: your interactions, use, habits, behaviours when dealing with us, our website, our emails and other applications. Employment Information: if you apply for employment with us, then your previous employment history, memberships or affiliations with associations, education history, details of your next of kin and referee details.

Other Information: any other administrative and additional information that you provide to us or authorise us to collect. Throughout our relationship with you, we may collect and hold additional personal information about you, including transactional information, account or policy information, complaint or enquiries about your product or service.

## **How We Collect Your Information**

We collect personal information from you in many different ways but try to collect personal information directly from you unless it's unreasonable or impracticable. For example, we may collect your personal information through our website, mobile sites or our emails, when you visit one of our offices, when you contact us or visit one of our social media sites (such as Facebook, Twitter or YouTube). We may receive information about you that we have taken no active step to collect. If this occurs, then we may keep records of this information or choose to destroy or de-identify the information.

There are other ways in which we are likely to collect personal and sensitive information, and these may include: through applications or requests made during or while carrying out your financial planning; enquiring with us or signing up to our mailing list or marketing material; if we take a photograph, video or other audio-visual recordings of you; by submitting feedback or participating in a survey, market

research or other promotional activity that we (or an agent of ours) conducts; and through submitting any enquiry or application for employment. We may collect personal and sensitive information about you from other sources, and these may include:

your employer, accountant, real estate agent or other referees; your agents and other representatives acting on your behalf, such as your insurers, referrers, brokers, solicitors; your co-applicants, as well as any applicable guarantors; our affiliated and related companies; third-party agents, suppliers and contractors who assist us in operating our business; recruitment service providers and any referees provided on employment applications; other bodies that issue identification documents to help us check your identity; marketing research service providers that we engage; and through our social media platforms and from people that you are connected with on these platforms. You can always decline to give us your personal information, but that may mean that we cannot provide you with some or all of the products and services you have requested or that we have recommended to you. Consequently, this may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of our advice.

Additionally, we'll never ask you for your security, bank or other financial details over the telephone, by email or by SMS. If you are ever unsure, please do not provide any information and contact us immediately to verify the request made to you.

### **Why We Collect Your Information**

Generally, we will not collect and use your personal information other than for the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such collection or use. Unless required by law, we will only collect sensitive information with your consent.

The purposes for which we collect and use your personal information depends on the nature of your interaction with us and include the following circumstances: responding to requests for information, feedback and other general enquiries; communicating with you and confirming your identity; providing you with our services or the purpose requested, such as providing financial planning advice, preparing and reviewing your financial plan, making securities and investment recommendations and reviewing those recommendations; administering or manage the services and products provided to you; to process any applications, requests, forms and documents with third parties or to carry out authorised tasks in respect of your

financial planning and investment objectives; processing your purchases, orders, transactions or sales, including the processing of payments, arranging transactions and providing you with invoices or order confirmations; informing you about our business and service offerings, news, updates, direct marketing material and event invitations (including through our social media platforms for our convenience); for data and marketing research and developing and improving our product and service offering; processing our recruitment and employment processes (including for volunteers, internships and work experience); administering activities, events, contests or promotions; and for any other purposes (including secondary purposes) that you would reasonably expect; and to enable us to comply with our obligations under the law.

### **Disclosing Your Information**

During the conduct of our business, we may disclose your personal information in a variety of circumstances, including to the following parties: other financial planners or holders of an Australian Financial Services Licence (known as AFSL) including in the events of negotiating the sale of our business or having sold the business, or if our office is closed for the continuity of our services for you; superannuation fund trustees, insurance providers, and product issuers; our affiliates, subsidiaries and related entities; our engaged contractors, agents, suppliers who provide or perform different products and services for us; commercial partners under an agreed information sharing arrangement; our marketing research service providers and digital marketing agents; third party website service providers and website plugin or widget service providers; our professional advisors, such as our lawyers, accountants and financial advisers; the relevant courts, tribunals or regulatory authorities and law enforcement bodies; anyone else to whom you authorise us to disclose your information or that would be reasonably expected; any other company or individual that it is necessary to disclose your personal information to enable us to provide you with the products or services that you have requested; and potential purchasers of our business for their due diligence investigations. We take reasonable steps to ensure that the third parties we engage take reasonable steps to protect your personal information following the APPs and in a similar manner with this Privacy Policy. Our third-party service providers are required only to use the personal information disclosed to them by us for the purpose that it was provided to them. Additionally, the third parties who we have disclosed your personal information to may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

We also use Google Analytics to help us understand how our customers and clients use our platforms, products and services. You can read more about how Google uses your Personal Information via <https://www.google.com/intl/en/policies/privacy/>. You may also opt-out of Google Analytics here: <https://tools.google.com/dlpage/gaoptout>.

### **We Disclose Information To Overseas Recipients?**

Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you ask us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the APPs, and we will not be liable for any mishandling of your information in such circumstances.

### **Protection, Storage And How We Hold Your Personal Information**

DP Wealth Advisory takes reasonable steps to protect your personal information from unauthorised access, use, or disclosure. For example, we maintain computer and network security, i.e. we use firewalls (security measures for the internet) and other security systems such as identifiers and passwords to control access to our computer systems.

With that in mind, there is no method of transmission over the internet or through electronic storage through our engaged providers that is fully secure. We cannot guarantee the security of your personal information. If we are required by law to inform you of any unauthorised access, use, or disclosure of your personal information, then we will notify you electronically, in writing or by telephone (if required and permitted to do so by law).

Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Anyone using our website is encouraged to exercise care in sending Personal Information via the internet.

### **We hold and store your personal information in any of the following ways:**

paper-based files; or electronic record keeping methods; and trusted third party storage providers based in Australia and overseas, including cloud-based storage providers. Paper-Based Storage Your personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take

reasonable steps to protect your personal information from misuse, interference and loss and unauthorised access, modification or disclosure.

### **Electronic Storage**

Your personal information is generally usually collected in electronic form for use or storage with the third-party storage provider that we engage.

### **Third-Party Storage**

Your personal information is generally usually collected in electronic form for use or storage with the third-party storage provider that we engage.

We cannot ensure that your Personal Information is or will remain secure. This is due to us not having control over the third-party provider's policies and procedures concerning the handling and storage of your Personal Information. We take reasonable steps to ensure that the third parties we engage take reasonable steps to protect your personal information following the APPs and a similar manner with this Privacy Policy.

### **The Choices That You Can Make About Your Personal Information**

You can request your Personal Information to:

be destroyed; or

be de-identified; or

be accessed; or

be provided to you as a copy,

at any time by request to our Privacy Officer using the contact details provided

below. We may not be able to entertain your request if it is unlawful to do so or is

otherwise impractical or unreasonable to do so. We provide more information below:

### **Deleting your personal information**

Your personal information is kept in our records until you request us to delete this information or as long as necessary to provide our products and services to you and for legitimate and essential business purposes, such as complying with our legal obligations or settling disputes. We're also required to keep some of your information for specific periods of time under law, such as the Corporations Act, the AML/CTF Act, and the Financial Transaction Reports Act for example. This means that your personal information can be held for some time. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

## **Remaining Anonymous & De-Identification**

We require you to provide specific details and information to provide our products and services to you. We provide everyone with the opportunity of staying anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, we can't deal with you anonymously or pseudonymously on an ongoing basis. If we do not collect your personal or sensitive information, then you may not be able to utilise the products or services, obtain or carry out of financial planning advice, participate in our events, programs or activities we manage or deliver.

## **Accessing or correcting your personal information?**

You can access or request a copy of your Personal Information held by us by sending us a request. You will not be charged for requests to access your Personal Information, but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.

On occasions, we may decline your request to access or correct your Personal Information in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your Personal Information about the requested correction.

## **Updating your personal information**

You are responsible for ensuring that your Personal Information with us is accurate and updated regularly. We will take reasonable steps to ensure that the Personal Information we collect, use or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors, inaccuracies or discrepancies in the information we hold about you and letting us know if your details change.

## **Direct Marketing Material - You Can Opt-Out**

We may use or disclose your personal information to inform you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below or through clicking the unsubscribe link included in the footer of our emails. We will process your request as soon as practicable.



If you opt-out of receiving marketing material from us, then we may still contact you concerning our ongoing relationship with you.

### **General Data Protection Regulation - GDPR Compliance**

GDPR stands for the General Data Protection Regulation and is effective as of 25 May 2018. GDPR replaces national privacy and security laws that previously existed within the European Union (the EU) with a single, comprehensive EU-wide law that governs the use, sharing, transferring and processing of any personal data that originates from the EU.

In some circumstances, the European Union General Data Protection Regulation (GDPR) provides additional protection to individuals located in Europe. The fact that you may be located in Europe does not, however, on its own entitle you to protection under the GDPR. Our website does not explicitly target customers located in the European Union, and we do not monitor the behaviour of individuals in the European Union. Accordingly, the GDPR does not apply.

### **Making A Complaint**

You may contact us at any time if you have any questions or concerns about this Privacy Policy or about how your Personal Information has been handled. You may make a complaint to the Privacy Officer using the contact details set out below.

### **Complaint handling process:**

The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will contact you within thirty (30) days of the date we receive the written details of your complaint to acknowledge that we have received it. We may ask you to provide further information about your complaint and the outcome you are seeking.

Our Privacy Officer will review of the way we dealt with your Personal Information, conduct an internal investigation (if necessary) into the complaint and will respond to you within thirty (30) days of the date we acknowledged receipt of your complaint. If the matter is complicated or our investigation may take longer, we will let you know.

If you are not satisfied with the outcome of your complaint, you may refer the matter to the Office of the Australian Information Commissioner (OAIC).

Telephone: 1300 363 992

OAIC email address: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

OAIC complaints page: <http://www.oaic.gov.au/privacy/privacy-complaints>

## **Website Usage**

### Third party links

Our website may include links to websites operated by third parties. We have no responsibility or liability for the content and activities of these linked websites.

Nonetheless, we seek to protect the integrity of our website and welcome any comment about linked websites.

Your consent by using our website By using our website, you consent to this privacy policy.

## **Changes To This Privacy Policy**

We may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes. If there are any material changes to our Privacy Policy, then we will take reasonable steps to notify you of any changes by either sending you an email to your last known email address that we hold.

## **Contact Information**

We welcome your comments and questions about our Privacy Policy.

Please contact our Privacy Officer at the following:

Attention: Privacy Officer

Telephone: 07 4690 2588

Email: [andrew@dp.net.au](mailto:andrew@dp.net.au)

This Privacy Policy was last updated on 30th June 2020.