

PRIVACY POLICY

1. Finance Wise Global Securities Pty Ltd ("fwgs") abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001. A summary of the National Privacy principles is available by contacting our office.
2. As a financial planning organization 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 and advice service is dependent on us obtaining certain personal information about you, including:
 - (a) employment details and employment history;
 - (b) details of your financial needs and objectives;
 - (c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
 - (d) details of your investment preferences and aversion or tolerance to risk;
 - (e) information about your employment history, employment circumstances, family commitments and social security eligibility;
 - (f) your Tax File Number; and, where appropriate, the Australian Company Number or Australian Business Number of either your business(es), or one(s) in which you are heavily involved.
3. As we are required pursuant to the Corporations Act to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.
4. **Information Collection Policies**
 - 4.1 We shall 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.
 - 4.2 Generally, collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of these methods.
 - 4.3 We shall 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 including:
 - a) the preparation of your financial plan or Statement of Advice;
 - b) the provision of financial planning advice to you;
 - c) making securities and investment recommendations;
 - d) reviewing your financial plan and strategies;
 - e) reviewing securities and investment recommendations;
 - f) reassessing your risk insurance needs.
5. **Information Use and Disclosure Policies**
 - 5.1 We shall 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 National Privacy Principles 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.
 - 5.2 We are required under the Rules of Professional Conduct to make certain information available for inspection or audit to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.
 - 5.3 We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however, you may, by contacting us by any of the methods detailed below, request not to receive such information and we shall give effect to that request. Please allow 2 weeks for your request to be actioned.
 - 5.4 We may disclose your personal information to another financial planner, within the fwgs group, when this office is unmanned or closed, or your regular financial planner is absent so that you can be assured of receiving a continued service.
 - 5.5 We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.
 - 5.6 In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our authorised representatives who will be your primary point of contact with the fwgs group. It is a condition of our agreement with each of our authorised representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any fwgs representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the means detailed below.
 - 5.7 We may disclose your personal information to external contractors for the following purposes:
 - (a) To alter or restructure your investment, superannuation, allocated pension or insurance portfolio as personal and/or economic circumstances may warrant;
 - (b) Acting on your instructions, or those of a third party authorised by you, to contribute additional funds, withdraw or transfer capital invested on your behalf.
 - 5.8 Pursuant to clause 5.7, any external contractor located overseas will be required to agree to, and comply with, fwgs' Privacy Policy.
 - 5.8 In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations.

Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

6. Document Storage and Security Policies and Practices

- 6.1 Your personal information is generally held in your client file. Information may also be held in a computer database.
- 6.2 We shall at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All computer based information is protected through the use of access passwords on each computer and screen saver passwords. Data is backed up each evening and copied to external hard drives which are stored off premises.
- 6.3 In the event that you cease to be a client of fwgs, any personal information which we hold about you will be maintained in a secure facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

7. How You May Gain Access to Your Personal Information

- 7.1 You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we shall (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We shall, prior to providing access in accordance with this policy, require you to provide evidence of your identity.
- 7.2 We shall not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or an explanation of that result.
- 7.3 We shall not provide you with access to your personal information if:-
 - (a) providing access would pose a serious threat to the life or health of a person;
 - (b) providing access would have an unreasonable impact on the privacy of others;
 - (c) the request for access is frivolous or vexatious;
 - (d) the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
 - (e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
 - (f) providing access would be unlawful;
 - (g) denying access is required or authorised by or under law;
 - (h) providing access would be likely to prejudice operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.
- 7.4 In the event we refuse you access to your personal information we shall provide you with an explanation for that refusal.

8. Access and Correction Policies and Procedures

- 8.1 We shall endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that

any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or outdatedness and we shall, if we agree that the information requires correcting, take all reasonable steps to correct the information.

- 8.2 If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.
- 8.3 We shall endeavour to respond to any request for access within 14 – 30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

9. How a Privacy Complaint May be Made

- 9.1 If you wish to complain about any breach or potential breach of this policy or the National Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

10. Electronic Online Data Collection

- 10.1 “financewise.net.au” and “fwgs.net.au” contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the national Privacy Principles.
- 10.2 While it is not necessary to register your personal details to use our Web site, we do offer a registration service which will enable you to receive product and service updates, newsletters and other information.
- 10.3 If you have not registered with us and decide, at any time, that you do not wish to receive any further information from us, you can send an e-mail to the e-mail address noted below requesting to be removed from our online registration database. Please allow 2 weeks for your request to be actioned.
- 10.4 You may amend or update your registration details by sending an e-mail to the e-mail address noted below providing your amended details. Please allow 2 weeks for your request to be actioned.
- 10.5 Our Web site uses cookies which allow 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. Your Internet service provider should be able to assist you to set your preference.

CONTACT DETAILS

Privacy Officer: James Barger-Bos
Address: 31/100 Rose Terrace
WAYVILLE SA 5034
Telephone: 08 8299-9707
E-mail: jamesb@fwgs.net.au