

# Privacy Policy Statement

## Your privacy is important to us

Your privacy is important to us. This statement outlines our policy on how we manage the personal information we hold about our customers.

We respect the confidentiality of information and the privacy of individuals. We are bound by the *National Privacy Principles* contained in the *Privacy Act 1988* (Cth).

Our Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by our most current Privacy Policy.

## Our privacy policy is based on openness

We are committed to being open about how we use personal information.

Where our documents ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

## Why do we collect personal information?

Our business is to provide financial planning advice and other services to help individuals understand their financial needs and make financial and investment decisions. To do this effectively, we need to collect certain personal information.

## What kind of personal information do we ask for?

Because of the nature of the services provided, government regulations and taxation laws, we ask for a range of personal information from our customers.

In collecting tax file numbers ("**TFNs**") or information which relates to TFNs, please note that the laws relating to collection of TFNs are very strict and you should not be collecting any TFNs through your website.

The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements and employment details.

We obtain most of the information directly from our customers in the course of providing financial planning advice and ongoing customer service. We may also obtain information from other sources.

We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers.

In some circumstances, we may also need to collect sensitive information. For more details, see the section 'Sensitive information is subject to greater restrictions'.

If you choose not to provide the information we need to fulfil your request for a specific service, we may not be able to provide you with the requested service.

## How do we use this information and who may we disclose it to?

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy.

Unless you are informed otherwise, the personal information we hold is used to enable us to provide you with the services that you have requested, to review your ongoing needs, to enhance customer service and available

options and giving you ongoing information or opportunities that we believe may be relevant to your financial needs and other circumstances.

Depending on the service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- AMP or other members of the AMP group who provide financial and other services.
- our service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, research or other services.
- insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law.
- credit reporting or reference agencies or insurance investigators.
- anyone authorised by the individual to whom the personal information belongs.

Generally, we require that organisations who handle or obtain personal information as service providers to us acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the National Privacy Principles and this policy.

### **Sensitive information is subject to greater restrictions**

Some personal information we hold is 'sensitive'.

Sensitive information relates to a person's racial or ethnic origin, membership of political bodies, religions or trade unions, sexual preferences or activities, criminal record, state of health and medical history.

The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law.

Sensitive information is usually needed for applications for death, sickness and disability insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is our policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the customer agrees otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this.

### **Management of personal information**

Our staff who handle personal information are trained to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

We will manage the collection, use and disclosure of personal information in accordance with this statement and the Privacy Act.

### **How do we store personal information?**

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

### **How do we keep personal information accurate and up-to-date?**

We endeavour to ensure that the personal information we hold is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. If you consider that any personal information we hold about you is not accurate or up to date, you can ask us to update this information by contacting us.

## **You have the right to check what personal information we hold about you**

Under the Commonwealth Privacy Act, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any inaccuracy. (The Act) does set out some exceptions to this.

To make a request, you will need to complete an application form verifying your identity and specifying what information you require.

We will acknowledge your request within 14 days and respond promptly to it. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

## **What if you have a complaint?**

If you consider that any of our actions breaches this Privacy Policy Statement or the National Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please use the details in the 'Contact Us' section of our website to let us know.

If you are not satisfied with our response to your complaint, you can telephone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

## **How to contact us**

If you want to:

- make a general enquiry about our privacy policy.
- change your personal information.
- obtain an application form for access to your personal information.

you can contact us using the details set out in the Contact Us section of our website.

## **What is a Cookie and How do we use cookies?**

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the web site, when you return to the web site, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our web site, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the website without having to log in each time you visit. We may also use independent external service providers to track the traffic and usage on the web site.

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website if you choose to disable the cookie acceptance in your browser. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

## **Technology improvements**

We are constantly striving to improve functionality on this website through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy, will be notified in this Statement at the time of the change.

## **Links to third party websites**

Our website may have links to external third party websites that may benefit the user.

External websites should contain their own privacy statements and we recommend you review them when using their websites.

Please note, however, that third party websites are not covered by our privacy policy and these sites are not subject to our privacy standards and procedures.