

## **PRIVACY POLICY**

Abbotts Wealth Management Pty Ltd  
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### **OUR COMMITMENT**

At Abbotts Wealth Management Pty Ltd, we recognise that your privacy is important. We are committed to protecting your privacy and the confidentiality of your personal information.

### **PRIVACY LEGISLATION AND NATIONAL PRIVACY PRINCIPLES**

The Privacy Amendment (Enhancing Privacy Protection) Act sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

As a financial services organisation, we are subject to certain legislative and regulatory requirements, including s961B of the Corporations Act, which necessitate us to obtain personal information about you.

We are also required to collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 before providing certain financial products and/or services.

### **WHAT SORTS OF INFORMATION DO WE HOLD ABOUT YOU**

Our ability to provide you with a comprehensive financial planning and advisory service is dependent on us obtaining certain personal information about you, including:

- employment details and employment history;
- details of your financial needs and objectives;
- details of your investment preferences and aversion or tolerance to risk;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, etc.;
- information about your employment history, employment circumstances, family structure, commitments and social security eligibility;
- any other relevant information including medical history and/or reports required for the purposes of risk insurance.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we'll destroy or de-identify that personal information as soon as practicable.

### **YOUR INFORMATION MUST BE ACCURATE**

If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

## **COLLECTION**

At or before the time we collect personal information from you we will make reasonable steps to inform you why we are collecting that personal information, who else we might disclose that personal information to and what may happen if you do not provide personal information to us. We will only collect information directly from you unless you have authorised us to collect the information from a third party. You have a right to refuse us authorisation to collect information from a third party.

Abbotts Wealth Management Pty Ltd collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- directly from you, when you provide information through a data collection form;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet; and
- directly from fund managers, superannuation funds, life insurance companies and other product issuers, once authorisation has been provided by you.

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

## **WEBSITE USAGE**

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

## **USE AND DISCLOSURE**

Our main purposes for collecting personal information are to facilitate financial planning, financial products or services, insurance policies or related services, and to update our records.

We may use and disclose personal information for the purposes for which it was provided or secondary purposes in circumstances where you would reasonably expect such use or disclosure.

We may disclose personal information to third parties or external contractors carrying out functions and duties for and on behalf of Abbotts Wealth Management. It is a condition of our agreement with each of our external contractors that they adhere to this privacy policy.

The information we collect from you may also be disclosed to third parties if the disclosure is required by or permitted by law, or pursuant to the Rules of Professional Conduct of the Financial Planning Association of Australia.

We may disclose your personal information to organisations outside Abbotts Wealth Management. The organisations to which we disclose information may include:

- superannuation fund trustees,
- insurance providers, fund managers and other product providers in order to manage or administer your product or service;
- Compliance consultants to ensure that our representatives are meeting our compliance standards;
- Paraplanning 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 or 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.
- A potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business.

In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client, you will be advised of any such transfer.

Abbotts Wealth Management Pty Ltd takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas, as part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. It is not practicable to list every country in which such recipients are located but if this occurs we will obtain your specific consent before such information is sent overseas.

#### **MARKETING AND PRIVACY**

Abbotts Wealth Management 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. You may, by contacting us by any of the methods detailed in this policy statement, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

#### **MARKETING OPT-OUT**

We maintain a marketing restrictions register. If you would not like to receive direct marketing from us, please let us know and we will maintain your wishes in our register.

#### **ACCESS AND CORRECTION**

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Please address your request to the Privacy Officer (contact details below).

Access to the requested personal information may include: providing you with copies; providing you with the opportunity for inspection; or providing you with a summary.

We will 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 process or an explanation of that result.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;

- providing access would be unlawful; denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain 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.

Abbotts Wealth Management reserves the right to charge a fee for searching for and providing access to your personal information. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information. In the event we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

We will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

### **IDENTIFIERS**

In some circumstances, we are required to collect government identifiers, for example, your Tax File Number. We will not use or disclose this information other than when required to do so by law or, when consented to by you.

### **DATA SECURITY**

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or Disclosure. We will not retain any of your information for any longer than it is required by us, except to satisfy legal requirements.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed. We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours. Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site. Other measures taken are:

- Confidentiality requirements for our employees,
- Security measures for systems access,
- Providing a discreet environment for confidential discussions.

### **SENSITIVE INFORMATION**

Without your consent, we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or afflations, 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: 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 highly confidential.

## **PRIVACY COMPLAINTS**

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights.

### **Call us**

The Privacy Officer  
Ph. (08) 9321 2642

### **Write to us**

The Privacy Officer  
Abbotts Wealth Management Pty Ltd,  
PO Box 414  
Perth 6872

Our Privacy Officer will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the determination of our Privacy Officer. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## **CHANGES TO THIS PRIVACY POLICY**

We reserve the right to review and amend this Privacy Policy from time to time. We encourage you to check our website regularly for any updates to our Privacy Policy at [www.abbotts.net.au](http://www.abbotts.net.au).