

## PRIVACY POLICY

At Impartial Financial advisers Pty Ltd, we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

### **What personal information do we collect and hold?**

When we provide you with financial advisory services, we ask you for the information we need to be able to understand your objectives, financial situation and needs. We collect your information through electronic, verbal and face-to-face communications and can include a broad range of information from your name, address, contact details and age, to information about your personal affairs including (but not limited to) your income and employment details, your assets and liabilities, budgets and goals.

We may also collect your information from third parties such as your bank, accountant, solicitor, insurer, superannuation fund manager etc.

We only collect sensitive information such as tax file numbers, marital and health status (including family history) and heritage with your agreement and/or if it is necessary for us to do so to understand your needs, objectives and financial situation, make recommendations and provide advice and lodge applications as part of your advice that you have agreed to.

### **How do we use your information?**

We use your personal information to understand your financial situation, formulate our professional advice and assist you to apply for relevant products.

We also use your personal information to manage your ongoing requirements and our relationship with you, e.g. keeping up-to-date and accurate cash flow records, review funds under management and insurance policies, ensure your estate planning remains relevant to your circumstances. This includes contacting you by mail or electronically (unless you tell us you do not wish to receive electronic communications).

From time to time we will use your contact details to send you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. We may also send you regular updates by email or by post. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

### **What if you don't provide information to us?**

If you do not provide us with some or all the information that we ask for, we may not be able to provide you with personal advice.

You can contact us without using your name or by using a pseudonym. However, we may need your name or contact details to respond to you.

### **How do we store and protect your personal information?**

We strive to maintain the relevance, accuracy and completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.

We hold some of the information we collect from you in paper format securely in our office, and the remainder is kept electronically in a secure cloud platform called Microsoft Sharepoint which has the following security features:

- PowerShell console that requires two-factor authentication
- two-factor authentication for your identities in Microsoft 365
- Physical protection: Only a limited number of essential personnel can gain access to datacenters
- Network protection: The networks and identities are isolated from the Microsoft corporate network
- Application security: Engineers who build features follow the security development lifecycle. Automated and manual analyses help identify possible vulnerabilities.
- Content protection: Your data is encrypted at the disk level using BitLocker encryption and at the file level using keys.
- The Microsoft 365 anti-malware engine
- Webroot Business End Point Protection.

If your file is archived it is sent to an external data storage provider for a period of time. We only use storage providers in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by only allowing authorised staff to access hardcopy files and setting different levels of permissions for staff access on electronic files. All access to files is immediately cancelled upon a staff member ceasing employment. We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

### **Will we disclose your personal information to anyone?**

We do not sell, trade, or rent your personal information to others. We will disclose your information to banks, product providers (such as insurers and fund managers), accountants, solicitors and other third parties, but only with your permission. Otherwise, information will only be disclosed securely and confidentially for quality and compliance purposes by authorised parties.

We may also need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers, paraplanning service providers, external compliance specialists or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. We will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may provide your information to others if we are required to do so by law or under some other unusual circumstances which the Privacy Act permits.

We will not disclose your information to overseas recipients.

### **How can you check, update or change the information we are holding?**

You may ask us for access to your personal information and to correct it at any time.

Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or complying with a correction request.

To access or correct your personal information, please write to:

The Privacy Manager

Impartial Financial Advisers

E: [micksteffan@ifswa.com.au](mailto:micksteffan@ifswa.com.au)

P: 58 Hillview Drive, Drummond Cove, WA 6532

T: 0466414321

We may charge you for our reasonable expenses incurred in providing you with access to your information if you are no longer an actively engaged client, if the information you have requested has been archived or relates to information provided by you or updated by us more than 12 months prior to your request.

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

### **What happens if you want to complain?**

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer at:

The Privacy Manager

Impartial Financial Advisers

E: [micksteffan@ifswa.com.au](mailto:micksteffan@ifswa.com.au)

P: 58 Hillview Drive, Drummond Cove, WA 6532

T: 0466414321

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

### **Your consent**

By asking us to assist with your financial planning needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

### **Updating this policy**

This Privacy Policy was prepared on 17 January 2022. We may update it at any time. The new version will be published on our website.