

Independent advisers WA
Corporate <u>Authorised</u> Representative No. 455979
Mc Mick Steffan <u>Authorised</u> Representative No. 233608

58 Hillview Drive, Drummond Cove WA 6532

IMPARTIAL FINANCIAL ADVISERS

58 Hillview Drive, Drummond Cove, WA 6532 www.ifswa.com.au 048 641 4321 ABN: 50 651 938 680

# **Privacy Policy – Updated June 2025**

#### Introduction

At Impartial Financial Advisers Pty Ltd and Independent Advisers WA (IFSWA), we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth). This policy outlines how we collect, use, store, and disclose your personal information, and your rights to access and correct that information or make a complaint.

## What personal information do we collect and hold?

We collect information that helps us understand your financial objectives and provide advice. This includes your name, contact details, income, employment, assets, liabilities, superannuation, insurance, and estate planning preferences. We may also collect sensitive information (e.g. tax file numbers, marital or health details), but only with your consent and when necessary for the advice process.

#### How do we use your information?

We use your personal information to provide financial advice and support ongoing service obligations such as portfolio reviews, insurance checks, estate planning, and regular contact. Occasionally, we may send updates or offers, which you can opt out of at any time.

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

Without certain personal information, we may be unable to provide tailored financial advice or assist with product applications. You may contact us anonymously, but we may need identifying details to respond meaningfully.

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

Information is stored securely in both paper form (locked office files) and electronically (Microsoft SharePoint with enterprise-grade encryption, two-factor authentication, access controls, and malware protection). Archived files are stored only with Australian-based providers who comply with the Privacy Act.

Impartial Financial Advisers, AFSL 533684

# **Use of Artificial Intelligence (AI) Tools**

We use AI tools, including OpenAI's ChatGPT Team, to support the preparation of financial documents like SOAs and ROAs. These tools are used under strict controls: data is not used for training, only authorised staff access the outputs, and no TFNs or sensitive identifiers are uploaded. If such data is detected, we take steps to redact it prior to use.

## **Cloud-Based Storage and Global Processing**

We use Microsoft SharePoint and integrated cloud tools. While we do not actively disclose your data overseas, some services may operate on secure global infrastructure. We ensure these services meet strict security standards. No data is used for marketing or Al model training.

## Will we disclose your personal information to anyone?

We do not sell or trade your personal data. We may share it with banks, product providers, accountants, solicitors, or contractors only with your permission or as required by law. All parties are expected to protect your information to the same standard as we do.

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

You may request access to or correction of your personal information at any time by contacting our Privacy Manager. We respond within 30 days. Inactive clients may be charged a reasonable retrieval fee if data is archived or over 12 months old.

### What happens if you want to complain?

We are committed to handling your personal information in accordance with the Privacy Act and Australian Privacy Principles.

If you believe we have not met our obligations or you have concerns about how your information has been handled, please contact our Privacy Manager:

#### **Privacy Manager**

Independent Advisers WA

₱ 58 Hillview Drive, Drummond Cove WA 6532

micksteffan@ifswa.com.au

**\** 0466 414 321

We will acknowledge your complaint within 5 business days and aim to resolve it within 30 calendar days. If we cannot resolve it to your satisfaction, you may escalate the matter to the **Office of the Australian Information Commissioner (OAIC)**:

- PGPO Box 5218, Sydney NSW 2001
- enquiries@oaic.gov.au
- 📞 1300 363 992
- www.oaic.gov.au

Your feedback is important to us, and we take complaints seriously to continually improve our services.

#### Your consent

By asking us to assist with your financial needs, you consent to our use of your personal information as outlined above, including secure use of digital and Al tools. If you prefer not to be included in Al-assisted workflows, please let us know.

# **Updating this policy**

This policy was updated in June 2025. We may amend it periodically and will publish the latest version on our website.

## **Policy Version Control**

Policy Review Date: June 2025

Next Review Due: June 2026 or earlier if legislation changes.

Version: 2025.6