

Privacy Policy

Impartial Financial Advisers Pty Ltd (AFSL 533684) and Independent Advisers WA | Updated September 2026

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) and the Australian Privacy Principles. This policy explains how we collect, use, store and disclose your personal information, and how you can access or correct it or make a complaint.

What personal information we collect and hold

We collect information that helps us understand your financial situation and objectives and give you advice. This includes your name, contact details, date of birth, identification documents, income, employment, assets, liabilities, superannuation, insurance and estate planning information. We may also collect sensitive information, such as health details or tax file numbers, but only with your consent and where it is needed for the advice.

We are also required by anti-money laundering law to verify your identity and screen new clients against sanctions and politically exposed person lists.

How we use your information

We use your personal information to provide financial advice and ongoing services, such as reviews, portfolio monitoring and implementing your instructions, and to meet our legal obligations. Occasionally we may send you updates or information about our services; you can opt out at any time.

If you do not provide information

Without certain information we may be unable to give you personal advice or help with product applications. You may contact us anonymously or using a pseudonym for general enquiries, but we need to identify you to provide advice.

How we store and protect your information

Your information is stored electronically in secure systems, including Microsoft 365 (SharePoint) and our client portal, protected by encryption, multi-factor authentication, access controls and malware protection. We do not keep paper client files. We keep your records for at least 7 years after our last service to you, as the law requires, and then securely destroy or de-identify information we no longer need.

Who we disclose your information to

We do not sell or trade your personal information. We may disclose it to:

- product providers, platforms and banks, to implement advice you have accepted;
- your accountant, solicitor or other professionals, with your permission;
- our service providers, including our contracted paraplanning and administration team, and IT, software and AI service providers; and
- regulators and others where required or authorised by law.

Our service providers must protect your information to the same standard we do and may use it only to provide services to us.

Overseas disclosure

Some of your personal information is disclosed to recipients outside Australia:

- **Sri Lanka:** our contracted paraplanning and administration team accesses client information within our secure systems to help prepare advice and administer your services. They work only within our systems and may not store, copy or share your information outside them.
- **Cloud and AI service providers:** some providers we use may store or process information in other countries, including the United States, where their infrastructure is located.

Before disclosing information overseas, we take reasonable steps to ensure the recipient handles it in line with the Australian Privacy Principles, and we remain accountable for how they handle it.

Use of artificial intelligence (AI) tools

We use AI tools to help prepare documents such as Statements and Records of Advice and to review our work. The tools we currently use include ChatGPT (OpenAI), Claude (Anthropic) and AI features in our client portal (Plutosoft), and we may use other tools that meet the same standards. We use AI tools only:

- under settings or terms that prevent your information being used to train the provider's models;
- without uploading tax file numbers or other government identifiers; and
- with every output reviewed by your adviser, who remains responsible for the advice.

If you prefer that your information is not used with AI tools, tell us and we will respect that.

Data breaches

If a data breach is likely to result in serious harm to you, we will notify you and the Office of the Australian Information Commissioner as required by the Notifiable Data Breaches scheme.

Accessing and correcting your information

You may ask to access or correct the personal information we hold about you at any time by contacting our Privacy Officer. We will respond within 30 days. There is no charge to make a request; if retrieving archived records involves significant cost, we may charge a reasonable fee, which we will tell you about first.

Complaints

If you have a concern about how we have handled your personal information, please contact our Privacy Officer. We will acknowledge your complaint within 1 business day and aim to resolve it within 30 calendar days.

Privacy Officer, Independent Advisers WA, 58 Hillview Drive, Drummond Cove WA 6532 |
micksteffan@ifswa.com.au | 0466 414 321

If you are not satisfied with our response, you can contact the Office of the Australian Information Commissioner: www.oaic.gov.au, 1300 363 992, enquiries@oaic.gov.au, GPO Box 5218, Sydney NSW 2001. Complaints about our financial services generally can also be taken to the Australian Financial Complaints Authority (www.afca.org.au, 1800 931 678).

Updates to this policy

We review this policy at least annually and when the law or our practices change. The current version is published on our website.

Field	Detail
Version	2026.9
Date approved	27/09/2026
Next review	September 2027
Supersedes	Privacy Policy June 2025 (version 2025.6)