



## BWA Financial Group Pty Ltd Privacy Policy

When you trust us with your personal information, you expect us to protect it and keep it safe.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

### ABOUT THIS POLICY

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

#### ***What is personal information?***

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

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

When you seek financial advice and/or apply for a financial product or services we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. If you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Whilst you remain a client of our business, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to help us support you with a claim.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

#### ***For what purposes do we collect, hold, use and disclose personal information?***

The main reason we collect, use, hold and disclose personal information is to provide you with advice, products and services. This includes:

- Providing you personal financial product advice that is specific to your needs and objectives;
- Checking whether you are eligible for a product or service;
- Assisting you through the underwriting process for insurance applications;
- Making changes to your advice arrangements; and
- Help keep you on track as part of our ongoing advice service arrangements.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about advice, products or services we think may interest you.

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

We collect most personal information directly from you. For example, we will collect your personal information when you seek financial advice.

We also collect information from you electronically. For instance, when you visit our website or if you send us electronic correspondence (see "Do we collect personal information electronically?").

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- Publicly available sources of information, such as public registers;
- Your representatives (including your legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- Your employer;
- Other organisations, who jointly with us, provide products or services to you;
- Commercial information service providers, such as companies that provide fraud prevention reports; and
- Insurers, re-insurers and health care providers.

### ***What laws require or authorise us to collect personal information?***

We are required or authorised to collect:

- Certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- Your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth); and
- Certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).

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

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia and owned by either Beach Wealth Advisers or external service providers.

Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- Access to information systems is controlled through identity and access management;
- Employees are bound by internal information security policies and are required to keep information secure;
- All employees are required to complete training about information security; and
- We regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

## ***Who do we disclose your personal information to, and why?***

We may provide personal information about our clients to organisations outside Beach Wealth Advisers. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- Our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- Paraplanning service providers;
- Insurers, re-insurers and health care providers;
- Payment systems operators (for example, merchants receiving card payments);
- Other organisations, who jointly with us, provide products or services to you;
- Financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;
- Debt collectors;
- Our legal advisers or auditors;
- Your representatives (including your legal adviser, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- Fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- IT Service Providers;
- Our Licensee, BWA Financial Group Pty Ltd (“BWA Financial Group”), Beach Wealth Advisers, and their related entities;
- External dispute resolution schemes; and
- Regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside BWA Financial Group Pty Ltd where:

- We are required or authorised by law or where we have a public duty to do so;
- You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- We are otherwise permitted to disclose the information under the Privacy Act.

## ***Do we disclose personal information overseas?***

We may disclose your personal information to a recipient which is located outside Australia. This includes:

- Any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

## ***Do we use or disclose personal information for marketing?***

We use your personal information for the purpose providing financial services and advice to you.

We may also, from time to time, use your personal information (excluding sensitive information) for the purposes of direct marketing to you. Generally, we will only provide you with direct marketing if you have consented for us to do so, and you are able to opt out of receiving direct marketing from us at any time by contacting your financial adviser.

## ***Do we collect personal information electronically?***

We will collect information from you electronically, for instance through internet browsing

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Beach Wealth Advisers site.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

### ***Access to and correction of personal information***

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information.

If we refuse to give you access to or to correct your personal information we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

### ***Resolving your privacy concerns and complaints – your rights***

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving providers of financial services.

AFCA can be contacted at:

Australian Financial Complaints Authority (AFCA)  
GPO Box 3  
MELBOURNE VIC 3001  
Phone: 1800 931 678  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
[www.afca.org.au](http://www.afca.org.au)

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218  
SYDNEY NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)

You can contact us by:

PO Box 440  
BELMONT VIC 3216  
Phone: (03) 5223 1219  
Email: [contact@beachwealthadvisers.com.au](mailto:contact@beachwealthadvisers.com.au)  
[www.beachwealthadvisers.com.au](http://www.beachwealthadvisers.com.au)

### ***Changes to the Privacy Policy***

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on [www.beachwealthadvisers.com.au](http://www.beachwealthadvisers.com.au) or by calling us on (03) 5223 1219.

### ***Meaning of words***

**We, us or our** means:

- BWA Financial Group Pty Ltd (ABN 35 618 500 922, AFSL No. 498086) and Beach Wealth Advisers Pty Ltd (ABN 89 708 106 809) and its related bodies corporate.