



FINANCIAL CONSULTANTS

Privacy policy
September 2019

Solutions is dedicated to providing you with the highest levels of client service. We recognise that your privacy is very important to you. We are committed to implementing and promoting a privacy policy which will ensure the privacy and security of your personal information.

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. This policy provides guidance on how to meet the privacy obligations imposed by the APPs, the Privacy Amendment Act and the Privacy Act.

What is personal information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

What kinds of personal information do we collect and hold?

When we provide comprehensive financial planning advice to you, we are required to collect certain personal information from you as outlined in s945A of the Corporations Act. This includes:

- Your name, address, contact details and date of birth;
- Employment details and history;
- Financial details including your financial needs and objectives, your current financial position including your assets and liabilities, income, expenses, insurance cover and superannuation;
- Details of your investment preferences and risk tolerance;
- Your family circumstances and social security entitlements; and
- Any other information that we consider necessary.

In most cases, your personal information will be collected when you meet your financial planner in person, via face to face multimedia meeting, phone based meeting, or provide the information with written material. We may also collect personal information from third parties such as your accountant/ product providers/ solicitors.

Can you remain anonymous or use a pseudonym when dealing with us?

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our services.

However it will not be possible for us to assist you if you wish to remain anonymous or use a pseudonym as in order for us to provide you with personal advice we will first need to formally identify you with accordance to the Anti Money Laundering act and Counter-terrorism act.

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

We may share your personal information to companies that help us with our business. 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 information we disclose to them for the specific role we ask them to perform. If we seek to disclose personal information, for any other reason than the primary reason it was collected, then we must first contact you to have such disclosure authorised. However, before we release any of your personal details we will require you to provide written authority to do so.

Will my personal information be used for Direct Marketing?

We will use your personal information to offer you services we believe may interest you, but we will not do so if you tell us not to. The services may be offered by any staff member of Solutions, and may offer you services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media. If you do not want to receive marketing offers from us please contact us.

Do we disclose personal information overseas?

There are obligations under the APPs to ensure that personal information is not transferred to another country. It is the policy of Solutions that no personal information should be transferred outside of Australia without the client's prior approval, and subject to receiving prior confirmation from the senior management.

How we protect your personal information?

We keep your personal information in your client file. These files are accessible to authorised personnel only and are stored in a combination of secure computer storage facilities, filing cabinets and other formats. We take steps to protect your personal information we hold against loss, unauthorised access, use, modification or disclosure and against other misuses. These steps include password protection for the computers, securing paper filing cabinets and physical access restrictions.

How do you access and update personal information?

You may request a copy of your personal information we hold. This is subject to certain exceptions allowed by law, such as where the access provided would have unreasonable impact upon the privacy of others. We ask that you provide your request to us in writing (for security reasons) and we will provide you with access to that personal information. Please allow up to 14 working days for the requested information to be forwarded.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

If we deny a request for access we will provide you with the reason for this decision in writing.

We take steps to ensure that the information collected from you is accurate, up-to-date and complete. Generally, this information is gathered during our fact find process with your financial planner or credit representative. Your personal information will be treated as confidential information and sensitive information will be treated highly confidential. If you believe that any of the personal information that we hold is inaccurate, please contact us at your earliest convenience.

How long do we retain your personal information?

We are required by law to retain all personal information and records for a period of 7 years. Where you are no longer a client of ours, we are obligated to retain your personal information in a secure manner for 7 years. After this period of time, we will take reasonable steps to destroy your personal information when it is no longer required.

What about privacy on the website?

Solutions website may provide links to third party websites. The use of your information by these third party sites is not within the control of Solutions and we cannot accept responsibility for the conduct of these organisations. External websites are not subject to our privacy standards, policies and procedures. We therefore recommend you review them on their websites.

We always take care to ensure that the personal information you provide us on our website is protected.

Some areas of the Solutions website may use 'cookies' to make your interaction with our site more efficient. A cookie is an element of data that a website can send you your browser, which then you may or may not choose to store on your system. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

What happens if you have privacy concerns and complaints?

The following is the procedure you should undertake if you have a privacy concern:

1. If you have a complaint, you should contact our administration officer and discuss the matter. Solutions Consultants will then have up to 45 days to respond to your complaint. We will endeavour to resolve your concerns in a fair and prompt manner.
2. If you are not satisfied with the outcome, you have two options:
 - a. Escalate the matter with our Complaints resolution manager, Chrissie Betts, via email, or calling directly. chrissie@choicecapital.com.au 03 9686 4976.
 - b. Contact AFCA via phone: 1800 931 678, or online via afca.org.au.