

## 1. GENERAL PRIVACY STATEMENT

Strategem Financial Group abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001.

## 2. PURPOSE AND USE OF YOUR PERSONAL INFORMATION.

As a tax & accounting and financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive taxation, general accounting or financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- (a) employment details and employment history;
- (b) details of your financial needs and objectives;
- (c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- (d) details of your investment preferences and aversion or tolerance to risk; and
- (e) information about your employment history, employment circumstances, family commitments and social security eligibility.

## 3. THE CONSEQUENCES OF NOT PROVIDING THE REQUESTED PERSONAL INFORMATION.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

## 4. INFORMATION COLLECTION POLICIES.

We will not collect any personal information about you except when you have knowingly

provided that information to us or authorised a third party to provide that information to us.

Generally collection of your personal information will be effected in either face to face interviews, over the telephone or by way of a client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- (a) preparation of taxation returns, accounting and other financial statements
- (b) the preparation of your financial plan;
- (c) the provision of financial planning advice to you;
- (d) making securities and investment recommendations;
- (e) reviewing your financial plan;
- (f) reviewing securities and investment recommendations;

## 5. INFORMATION USE AND DISCLOSURE POLICIES.

We will not use or disclose Personal Information collected by us for any purpose other than:

- (a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- (b) where you have consented to such disclosure; or
- (c) where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the ITAA, the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that

may be of interest to you, however you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan, administration of your taxation and accounting affairs and the recommendations made by us.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

We may disclose your personal information to external contractors for the following purposes:

- (a) obtaining finance
- (b) effecting transactions on your behalf on your instructions

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

### **6. DOCUMENT STORAGE AND SECURITY POLICIES AND PRACTICES.**

Your personal information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All computer based information is protected through the use of access passwords on each computer. Data is backed up each evening and stored securely off site.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off site storage facility for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

### **7. HOW YOU MAY GAIN ACCESS TO YOUR PERSONAL INFORMATION.**

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

We will not provide you with access to your personal information if:

- (a) providing access would pose a serious threat to the life or health of a person;
- (b) providing access would have an unreasonable impact on the privacy of others;
- (c) the request for access is frivolous or vexatious;
- (d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- (e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- (f) providing access would be unlawful;
- (g) denying access is required or authorised by or under law;
- (h) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

### **8. ACCESS AND CORRECTION POLICIES AND PROCEDURES.**

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or outdatedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

### **9. HOW A PRIVACY COMPLAINT MAY BE MADE.**

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner on Ph: 1300 363 992 who may investigate your complaint further.

#### **Contact Details**

Privacy Officer: Garry Chambers  
Address: 35 Mundy Street Bendigo  
Telephone: 0354454777  
Facsimile: 0354415264  
e-mail: [garry.chambers@strategem.com.au](mailto:garry.chambers@strategem.com.au)