

VERSION 1.1

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PRIVACY POLICY

2015

AFSL 225738

ASPECTFP DEALER SERVICES PTY LTD

PO BOX 284, BEACONSFIELD VIC 3807

PRIVACY POLICY

This Privacy Policy sets out the information handling policies of AspectFP Dealer Services Pty Ltd and its advisers as at 5 June 2015. AspectFP Dealer Services Pty Ltd recognizes the importance of privacy and we are committed to ensuring the privacy principles of your information. This policy explains the steps taken to comply with the Privacy Act and the Australian Privacy Principles.

INFORMATION COLLECTION

We will only collect information that is reasonable and necessary. We will notify you if we intend to collect information and will only collect information with your consent. The information that we hold will depend on the type of product and/or service we provide to you. The information may include:

- Name, address and contact details;
- Date of birth, age and your intended plans for retirement;
- Financial goals, needs, objectives and circumstances;
- Details of your dependents and beneficiaries;
- Financial information (for the purpose of preparing a statement of advice);
- Information regarding your health (for some type of insurances);
- Your tax file number (where you have given it to us);
- Insurance claim information;
- Investment information (regarding your financial goals or current situation);
- Identification documentation (which, in some cases, we are required to collect by law); and
- The products and services we provide or have provided, to you.

We do not collect sensitive information unless required by applicable laws or rules, or you have consented to it. Sensitive information includes information relating to race, political or religious beliefs, sexual preferences, criminal convictions; membership of professional or trade associations or unions and health information.

TRANSPARENT MANAGEMENT OF INFORMATION

AspectFP Dealer Services Pty Ltd has policies in place to ensure that when your information is collected it is collected on a reasonable and necessary basis and stored in secure systems online and offline to ensure the safety of your information.

There are practices in place ensure information is never mis-used, mis-placed, deleted or provided to someone other than the intended recipient. The practices are in place to ensure information is handled correctly and is in accordance with the Australian Privacy Principles.

USE OF YOUR PERSONAL INFORMATION

We use the personal information to assess your personal and financial circumstances and your risk tolerance so we can provide services to you.

DISCLOSURE OF PERSONAL INFORMATION

We may disclose your personal information to other organizations to assist us to implement and administer your investments, and provide you with certain products and services. We only use and disclose of personal information about you for the purpose for which it was disclosed to us and for related purposes which are reasonably necessary. For example, we may from time to time use your personal information to inform you of investment opportunities or to provide information about product and services that may be of interest to you. However, we do respect your right to ask us not to do this so please let us know if you do not want us to provide you with this additional information. We do not sell personal information to other organizations to allow them to do this. We may disclose your personal information to overseas entities if it is reasonably necessary for the provision of financial products and services. By law, in some circumstances, we may be required to disclose your personal information to third parties without your authorization such as to government authorities and law enforcement bodies in Australia and overseas.

QUALITY OF PERSONAL INFORMATION

It is in our interests to ensure that the personal information that we have about you is accurate, complete and up-to-date. To assist us with this, please advise us if you believe that any of the information that we have about you is not accurate, complete or up-to-date and all reasonable efforts will be made to correct your information. Please advise us if your situation changes which affects the data we have about you.

PERSONAL INFORMATION SECURITY

We are committed to keeping your information secure. We use all reasonable steps to protect the information from misuse and loss, and from unauthorized access, modification and disclosure. Where the information is no longer required, we will delete it or permanently de-identify it.

We have engaged in security certification for all websites and portals linked with AspectFP Dealer Services Pty Ltd and have a data arrangements and procedures to ensure all data is stored efficiently and correctly within our premises and online. We have implemented HTTPS (HTTP over SSL or HTTP Secure) the use of Secure Socket Layer (SSL) which encrypts and decrypts user page requests as well as the pages that are returned by the Web server

ANONYMITY AND PSEUDONYMITY

Where practical and within the law, you will be given an option to not identify yourself or use a pseudonym.

UNSOLICITED PERSONAL INFORMATION

If at any point in time AspectFP Dealer Services Pty Ltd obtains any information that is unsolicited. We will destroy or de-identify the information as soon as practicable, unless it is contained in a 'Commonwealth record' or it is unlawful or unreasonable to do so as in accordance with the Australian Privacy Principles.

ACCESS TO PERSONAL INFORMATION AND CORRECTION

Under the Australian Privacy Principles you have a right to access the information except as set out below. If you wish to access the information, please contact **your adviser** and they will make arrangements for you. In some circumstances, we may refuse you access to your information. Those circumstances are set out in the Australian Privacy Principles and include situations where we are required to do so at law or access is likely to prejudice an enforcement body in relation to unlawful activity or seriously improper conduct. If we are entitled, under the Australian Privacy Principles, to refuse to give you access to your personal information, we will tell you and provide reasons for our decision. If you establish that your personal information is not accurate, complete or up-to-date, we will take reasonable steps to correct that information in accordance with the Australian Privacy Principles.

CONTACT US ABOUT PRIVACY

If you would like further information about how we handle your privacy or if you would like to make a complaint about how we handled your personal information please contact:

AspectFP Dealer Services Pty Ltd
Privacy Officer – Rachael Vandenberg
PO Box 284, Beaconsfield VIC 3807
Phone: (03) 9583 6533