

## UNIFIED FINANCIAL SERVICES PTY LTD PRIVACY STATEMENT

### Our Commitment

At Unified Financial Services Pty. Ltd. (UFS), part of the Unified Planning Group, we honour without reservation our obligation to respect and protect the privacy of the personal information of individuals with whom we deal. Unified Financial Services is committed to the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 200 / and abide by these principles as detailed herein.

### 1. Collection

1.1 As a financial planning organisation we are subject to certain legislative and regulatory requirements. This makes it necessary for us to obtain and hold 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 financial planning and advice service depends 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;
- e) information about your employment history, employment circumstances, family commitments and social security eligibility;
- f) health status

### 1.2 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.

### 1.3 Information Collection Policies.

1.3.1 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.

1.3.2 Generally collection of your personal information will be collected in face-to-face interviews, over the telephone or by email. Additional and/or updated personal information may be collected through one or more of those methods.

1.3.3 We only collect, maintain and use personal information about you if it is necessary for us to provide the services you have requested to you including:

- a) the preparation of your Financial Plan (Statement of Advice);
- b) the provision of quality financial planning advice to you;
- c) making unlisted securities and investment recommendations;
- d) reviewing your financial plan;
- e) reviewing unlisted securities and investment recommendations;
- f) maintaining your contact details;

1.3.4 We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles or investment opportunities 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 2 weeks for your request to be actioned.

We do not sell personal information to other organisations to allow them to do this.

1.4 All staff are bound by client confidentiality agreements when handling your personal information.

1.5 Cookies

A cookie is a small data file that contains information about your visit to a web site. This information is provided by your computer during your first visit to a web server. The server records this information in a text file and stores this file on your hard drive. When you visit the same web site again, the server looks for the cookie and structures itself based on the information provided.

Most browsers are initially set up to accept cookies. You can reset your browser to refuse all cookies or to warn you before accepting cookies. If you have set your browser to warn you before accepting cookies, you will receive the warning message with each cookie. We use cookies to help us improve our service to visitors to our site and to ensure that our site stays easy to navigate and useful.

UFS cannot guarantee or accept responsibility for the privacy practices or the content of web sites to which we provide links.

## 2 Disclosure Policies

**2.1 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.

2.2 We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia (FPA) 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 (ASIC). As a member of the Financial Industry Complaints Service (FICS) we have an obligation to provide FICS with any information that is required in order to deal with a complaint (if the complaint can not be resolved internally).

2.3 We may disclose your personal information to another financial planner during periods when this office is unmanned or closed so that you can be assured of receiving a continued service.

2.4 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 and the recommendations made by us.

2.5 In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our agents or 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 agent or 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.

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

- a) IT – for data recovery
- b) Bookkeeping / Accounts – to settle your account
- c) Accountants – To assist with preparing your tax return, we require your written authority
- d) Mark Seamer – Finance Broker and Director of Unified Lending Services Pty Ltd - To assist us to determine how you may benefit from a finance meeting. Should you wish to meet with Mark Seamer regarding your finance structure we will ask you to sign an authority for us to provide information in relation to income, assets, liabilities, cashflow etc.

2.7 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.

2.9 In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

### **3 Data Quality**

3.1 Prior to the use and disclosure of personal information, reasonable steps will be taken to ensure that personal information is relevant and to the extent necessary, accurate, complete and up to date for the purpose for which it is to be used.

## **4 Document Storage and Security Policies and Practices.**

- 4.1 Your personal information is generally held in your client file. Information is also held on our computer database.
- 4.2 At all times we 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.
- 4.3 The office only uses security keys and has a monitored security alarm. All client files are stored in lockable cabinets that are locked out of office hours. Office doors are locked. All record movements off premises are recorded in a central register. Access to our premises is controlled by allowing only personnel with a security code to access the premises. Security codes are changed if staff members were to leave the organisation.
- 4.4 All computer-based information is protected through the use of access passwords on each computer and screen saver passwords. Virus checking is performed daily. UFS has separate data servers and email servers. Firewalls are present to block the route for 'hackers' to intrude into the UFS information system. Data is backed up each evening and stored securely off site. We run two separate servers, one for email and one for data so there is less chance your information can be accessed or corrupted. Our data server has mirrored hard drives which is another precaution.

File movement is recorded on our database and UFS encourages a clean desk policy. All staff are trained and audited by IT support in security awareness, practices and procedures.

- 4.5 All staff check facsimile numbers before sending personal information and confirm receipt. All staff check identity before giving out personal information over the telephone. No information is provided to a third party (accountant, solicitor etc.) without signed authority from the client.
- 4.6 In the event you cease to be a client of this organisation, any personal information which we hold about you will be stored for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed. If UFS no longer requires your personal information it is permanently destroyed. UFS takes steps to de-identify information used for training purposes. All staff sign confidentiality agreements.

If other organisations provide support services, we require them to appropriately safeguard the privacy of the information provided to them.

## **5 Openness**

- 5.1 UFS will have clearly expressed policies on its management of personal information and these will continue to be readily available. UFS will take reasonable steps to let individuals know, generally, what sort of personal information it holds, for what purposes, and how it collects, uses, and discloses that information.

## **6 Access and Correction**

### **Access to your personal information.**

- 6.1 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.
- 6.2 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.
- 6.3 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.
- 6.4 In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

### **Correction Policies and Procedures.**

- 6.5 We will endeavour to ensure that, at all times, the personal information about you 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 out of date, you may contact us by any of the methods detailed below and provide to us with evidence of the inaccurate, incomplete or outdated information and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.
- 6.6 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.
- 6.7 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.

### **7. Commonwealth Government Identifiers**

- 7.1 We will not adopt an identifier of an individual that which has been assigned by an external agency or contracted service provider.

### **8. Anonymity**

- 8.1 We will give individuals the option of not identifying themselves when entering transactions with us, wherever it is lawful and practicable.

## 9. Transborder Data Flows

- 9.1. We will not transfer personal information about an individual to someone who is in a foreign country, unless we have the written consent of that individual or the recipient is subject to a law, binding scheme or contract that effectively upholds principles similar to the National Privacy Principles.

## 10 Sensitive Information

We will only collect sensitive information about an individual with consent or if required by law.

We do not generally collect sensitive information about you unless required by application laws or rules. Sensitive information includes information relating to:

- a) race or ethnic origin
- b) political, religious or philosophical beliefs, memberships or affiliations
- c) sexual preferences
- d) criminal convictions
- e) membership of professional or trade associations or unions
- f) health information.

We collect health information where we offer products with an insurance component to our clients. We do not use or share this information for any purpose other than the underwriting or administration of a client's policy, claim or account, or as otherwise disclosed to the client when the information was collected.

## 11. Privacy Complaint Procedures

- 11.1 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 who may investigate your complaint further. **We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.**

## 12. Online Privacy Policy

- 12.1 The Unified Financial Services Website contains links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.
- 12.2 While it is not necessary to register your personal details to use our Web site, we do offer a registration service, which will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address [detail any other registration requirements].
- 12.3 If you have registered with us and decide, at any time, that you do not wish to receive any further information from us, you can send an e-mail to the e-mail address noted below requesting to be removed from our online registration database. Please allow 2 weeks for your request to be actioned.

- 12.4 You may amend or update your registration details by sending an e-mail to the e-mail address noted below providing your amended details. Please allow 2 weeks for your request to be actioned.

### 13. New Services and Development

- 13.1 UFS will consider the privacy impact of new services before they are introduced.
- 13.2 Unified Financial Services Pty Ltd may disclose your personal information to Mark Seamer, Finance Broker and Director of Unified Lending Services Pty Ltd - to assist us to determine how you may benefit from a finance meeting. Should you wish to meet with Mark Seamer regarding your finance structure we will ask you to sign an authority to disclose personal, financial information.

### 14. Compliance Audit

- 14.1 UFS may maintain an independent compliance audit program to ensure its privacy protection principles and policies remain appropriate, and that UFS operates in compliance with those principles and policies.

### Contact Details

Privacy Officer: Michelle Tate-Lovery  
Address: Carlton Clocktower Complex  
Suites 21-22  
255 Drummond Street  
Carlton, VIC 3053.  
Telephone: (03) 9349 1525  
Facsimile: (03) 9349 1530  
e-mail: michelle@unifiedfs.com.au

Please feel free to examine the Government Privacy website at [www.privacy.gov.au](http://www.privacy.gov.au) for a more detailed explanation of the policy.

**All of our staff are made aware of and adhere to the Unified Financial Services Privacy Policy.**