



Privacy Policy

AUSTRALIAN PRIVACY PRINCIPLES POLICY

ActonFinancialPlanning Pty Ltd and ActonLendingSolutions Pty Ltd are wholly owned subsidiaries of ActonAdviceGroup Pty Ltd. ActonAdviceGroup Pty Ltd (ActonAdviceGroup) abides by the Australian Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act, 2012.

PROTECTING YOUR INFORMATION IS IMPORTANT

At ActonAdviceGroup we understand the importance you attach to information that identifies you (your 'personal information') and want to help you protect it. We want you to be able to deal with us in full confidence that your personal information will only be dealt with by us in the ways we have described to you and that it will be held securely.

Depending on which services we are providing to you, the personal information collected may include

- ✿ your name, date of birth, gender, contact details,
- ✿ copies of valid identification documents,
- ✿ employment details,
- ✿ personal goals & objectives,
- ✿ details of assets & liabilities,
- ✿ details of income & expenses,
- ✿ copies of Power of Attorneys & estate planning documents,
- ✿ credit history, as well as
- ✿ your health and financial information.

Failure to provide the personal information 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. We have a legal obligation to collect sufficient information to ensure appropriate advice can be given in respect of recommendations we make to you. If you elect not to provide us with personal information, we may elect to discontinue our relationship with you if we believe we are unable to provide you with a complete service.

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. This Privacy Statement tells you how we collect information, what we do with that information and how you can gain access to personal information held by us.



WHAT WE DO WITH THE INFORMATION WE COLLECT ABOUT YOU

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, which may include:

- ✿ the facilitation of mortgage broking services to you;
- ✿ the preparation of your financial plan;
- ✿ the provision of financial planning advice to you;
- ✿ making securities and investment recommendations;
- ✿ reviewing your financial plan;
- ✿ reviewing securities and investment recommendations;
- ✿ reviewing your estate planning;
- ✿ other activities as directed by you.

Generally, collection of your personal information will be effected in either virtual interviews, over the telephone or via online means, or occasionally face to face meetings. From time to time additional and/or updated personal information may be collected through one or more of those methods.

How we use your personal information

We will only use the information you provided for the purpose of providing you with the service(s) you have requested. Your personal information will only be used for the main purpose of collection, except where you consent to us using that personal information for another purpose, where the other purpose is related to the main purpose and you would reasonably expect us to use the personal information for that other purpose, or where it is permitted or required by law, or we reasonably believe it is necessary on health and public safety grounds to use the personal information for another purpose.

From time to time, we may also use your contact details for marketing activities, such as function invitations . We respect your choice to opt out of these activities. Should you decide you do not wish to receive marketing or promotional material from us at any time, please let us know by sending us an e-mail at privacyofficer@actonadvice.com.au or write to us at 24 Costello Circuit, Calwell 2905 or call us on 02 6104 9059.

Will we share your personal information to outside parties?

Unless you request us not to, we may disclose your personal information to the following types of organisations:

- ✿ superannuation fund trustees;
- ✿ insurance providers;
- ✿ product issuers;
- ✿ banks and other financial institutions;
- ✿ mortgage insurers and valuers;
- ✿ other organisations which assist us in specialist areas such as lawyers, mortgage brokers, accountants, property investment advisers;
- ✿ external contractors for compliance monitoring, strategy development and/or providing financial planning services during periods of prolonged illness.

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. Where you have been referred, the organisation collecting your information for the referral will inform you of the use and management of your information. If you have any concerns in this regard, you should contact us by any of the methods detailed below.



So that our licensees (Sambe Investments Pty Ltd T/A Finchley & Kent) can discharge their legal responsibilities they will also have access to your personal information. To ensure that records are maintained as required, we and our Licensees may back-up electronic records. Some methods of remote storage include holding information in overseas locations. In addition, Product Providers such as those detailed above may also have similar data protection policies. Please refer to their Australian Privacy Principles Privacy Policy for further details.

Should ActonFinancialPlanning Pty Ltd cease to be licensed through Sambe Investments Pty Ltd T/A Finchley & Kent or ActonLendingSolutions Pty Ltd cease to be licensed by outsource financial and move to another Licensee, your personal information will be retained by Sambe Investments Pty Ltd T/A Finchley & Kent and/or outsource financial as well as by ActonAdviceGroup. We will notify all clients affected should such a transfer arise.

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 effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

Cross-border disclosure

ActonAdviceGroup will only transfer personal information about an individual to someone (other than a member of the ActonAdviceGroup or the individual) who is in a foreign country if we reasonably believe that the recipient of the information is subject to a law or binding scheme substantially similar to the Australian Privacy Principles and there are mechanisms that can be used to take action or enforce those laws or scheme. ActonAdviceGroup may also transfer the personal information if you specifically consent to us doing so, or we are required to do so under Australian law or an order of a court or tribunal. Otherwise, ActonAdviceGroup will take reasonable steps under the circumstances to ensure that the overseas recipient does not breach the Australian Privacy.

ActonAdviceGroup has chosen Microsoft and Google as two of our IT providers so as a result some support services for our computer systems are managed overseas. As part of usual business practices those support services do have access to our systems as well as data held in those systems. All ActonAdviceGroup data is accessed using HTTPS encrypted tunnels.

Due diligence was carried out to ensure appropriate levels of security are in place to ensure the security and integrity of the data, as well as systems and processes are adequate to ensure access to our servers is appropriately managed. ActonAdviceGroup data is stored in Microsoft and Google's network of data centres. Both Microsoft and Google use systems that have been specifically built for them and have been optimized for security and performance, with a security team that constantly test and enhance security infrastructure to ensure it is impervious to external attackers. Microsoft and Google maintains a number of [geographically distributed data centres](#). These computing clusters are designed with resiliency and redundancy in mind, eliminating single points of failure and minimizing the impact of common equipment failures and environmental risks. Access to these data centres is restricted to authorized personnel.

Information collected will not be disclosed, sold, distributed, leased, shared or passed onto any third party unless we have your consent to do so, we have disclosed to you the types of organisations whom this information would be shared (such as for future identification purposes with a third party you may invest with) or if we are required to do so by law.

Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

To comply with this legislation, we need to identify and verify our clients. We are required to obtain, verify and record information that verifies our clients before you are able to invest using our services. We are required to obtain details such as your full name, date of birth and residential address amongst other details for these purposes and we are required to store this information for a minimum of seven years.

For more information on the anti-money laundering and counter-terrorism financing act 2006, refer to <http://www.ag.gov.au/aml>.



Other Regulators

We may also be required by other regulators (such as the ASIC and the Privacy Commissioner) to provide records held. Each regulator is empowered under specific legislation to enable enforcement and monitoring to occur; it would be under the relevant legislation that we would need to comply and provide the regulator with.

Data Quality

We are keen to ensure that any personal information we hold remains accurate, complete and up to date. We therefore encourage you to advise us of any changes to your personal circumstances that may effect the work we do for you.

Data Security

Your personal information is generally held in your electronic client file. Information may, from time to time, be temporarily held in a paper working file. These files are shredded (by us) once the relevant information has been recorded electronically and the working file is no longer required.

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 temporary paper files are stored in a secure location in lockable filing cabinets.

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

Access to Information Collected

You can request us to provide you with access to personal information we hold about you. We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable.

Your request to access your personal information will be dealt with in a reasonable time. Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, would be a breach of the law, or where we have legal advice not to do so. If we refuse access, we will provide you with reasons for doing so.

Changes to our Privacy Statement

This information relates to our current privacy standards. From time to time, we may vary our privacy standards for any reasons. We will publish any changes on this website. This privacy statement was last amended March 2014.

Complaints Resolution

ActonAdviceGroup is committed to providing a fair and reasonable system for handling complaints from people whose personal information we hold, so please contact us immediately if you believe the privacy of your personal information has been compromised. If you have any concerns regarding the way we have handled your privacy please send us an email (privacyofficer@actonadvice.com.au) or write to us at 24 Costello Circuit, Calwell 2905 or call us on 02 6104 9059.

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.



WEBSITE

Collection of Information through our Website

ActonAdviceGroup collects information about you each time you come to any part of the ActonAdviceGroup website. We also collect information regarding the last site you visited before coming to the ActonAdviceGroup website. This information is collected for statistical analysis to continually improve ActonAdviceGroup services and website and no attempt is made by ActonAdviceGroup to identify the user.

When you send a message to ActonAdviceGroup

If you submit information to us either using an electronic form or application or by sending an email we collect that information and use it for the purposes that you have provided it. For example, if you apply on-line to book our courses, ActonAdviceGroup will use the information to process your booking and issue your booking and payment advice. Your details will not be used to add to a general mailing list, without your prior consent.

When using the Members On-line Services

ActonAdviceGroup also maintains a database of Members and subscribers that will from time to time be used by ActonAdviceGroup for marketing purposes or for the provision of industry information. If you are receiving advertising or other promotional material from ActonAdviceGroup you may ask to be taken off our mailing list at any time by sending an email to privacyofficer@actonadvice.com.au. We will not sell or give personal information to third parties for promotions independent of ActonAdviceGroup.

Links

Our website contains links to other websites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

[Privacy policy for Sambe Investments Pty Ltd T/A Finchley & Kent](#)