

PlanningSolo Licensing Pty Ltd

Privacy Policy

Version	Date	Amendment
2.2	17 September 2024	-

1. Overview

At PlanningSolo Licensing Pty Ltd, we are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles (APPs).

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. If you would like to know more information about how we protect your privacy, please feel free to contact us.

The purpose of this Privacy Policy is to explain how we manage your personal information. Our policy also sets out how you can make a complaint and how you can access the personal information we hold about you.

2. 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.

The information that we seek to collect about you will depend on the products or services that we are going to provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

For the purposes of this policy, personal information may include:

- your name;
- address;
- nationality;
- residency status;
- e-mail address;
- Tax File Number;
- financial information;
- beneficiaries;
- health; and
- financial situation.

3. Collection of personal information

3.1 Collection of personal information

We may collect and hold personal information for the purposes of enabling us to provide financial services to you.

For example, in order for us to provide personal advice to you, we are required to verify your identity and obtain information relating to your financial situation and your personal goals and objectives - this is so we can assess your personal situation and provide you with appropriate financial advice.

This information is generally collected directly from you as our client.

Any personal information collected by us is solely for the purpose of providing services to our clients and will not be disclosed unless the disclosure is required in the performance of those services (for example, disclosing your information to a financial institution in order to place an investment on your behalf).

Where we obtain sensitive information (e.g. racial or ethnic origin, political opinions,

religious beliefs or affiliations or criminal record), we will only do so with your consent and where the collection of such information is reasonably necessary for us to perform our function.

For example, we may also collect sensitive information (e.g. your health records) for the purposes of arranging insurance for you or assisting you with insurance claims. Where the information is deemed to be sensitive, for example, the collection of health information, there will be higher level of privacy protection afforded.

We will only collect personal information by lawful and fair means.

In general, we collect personal information about you from you unless you consent to the collection of your personal information from someone else or it is unreasonable or impracticable to do so.

In some instances, we may collect this information through third parties such as your family members, people authorised by you or health professionals (e.g. in the case of income protection insurance).

For example, we may collect personal information from you when you complete our client data form for the purposes of allowing us to provide you with financial advice or we assist you to acquire or dispose of a financial product (e.g. invest in a managed fund or rollover your superannuation).

3.2 How we hold your personal information

The information we hold about you will be stored electronically in secure data centres which are located in Australia and owned external service providers. Some of the information we hold may be stored in paper files. We use a range of physical and electronic security measures to protect the security of your personal information.

For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all of our employees complete regular training about information security;
- we regularly review our compliance with our internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

3.3 Notification of the collection of personal information

At or before the time we collect personal information about you, or if that is not practicable, as soon as practicable after, we will take reasonable steps to ensure you are aware of:

- a) who we are and our details;
- b) how we collect your personal information and whom from;
- c) whether the collection of your personal information is required or authorised by or under an Australian law or a court/tribunal order;
- d) the purposes for which we collect your personal information;
- e) the main consequences (if any) if we do not collect all or some of the personal information;
- f) any other person or body to whom we would disclose the personal information that we have collected;
- g) information about how you may access the personal information held by us about you and how you may seek correction of such information;

- h) how you may complain about a breach of the Australian Privacy Principles and how the entity will deal with such a complaint;
- i) whether we are likely to disclose the personal information to overseas recipients.

3.4 Who do we disclose your personal information to?

We may provide personal information about our clients to organisations outside of PlanningSolo Licensing Pty Ltd. To protect your personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts are designed to ensure they only use the personal information we disclose to them for the specific role we ask them to perform.

These may include:

- our agents, contractors and external services providers;
- insurers and re-insurers;
- payment system operators i.e. merchants receiving card payments;
- other organisations, who jointly with us, provide products or services to you;
- financial service organisations, such as banks, superannuation funds, custodians, stockbrokers, fund managers and portfolio service providers;
- legal advisers or auditors
- your chosen representatives such as, legal adviser, accountant, mortgage broker, executor;
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- IT service providers;
- external dispute resolution services; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others where:

- we are required or authorised by law or where we have a public duty to do so;
- you have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

3.5 Do we disclose your information overseas?

We may disclose your personal information to a recipient which is located outside of Australia, including the paraplanning and virtual assistance firm we work with in the Philippines and financial institutions which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

3.6 Marketing and your personal information

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. We may offer these by various means, including mail, telephone, email, SMS or other electronic means, such as social media or or targeted advertising through our website.

Your personal information may be disclosed to those who assist us to market our products and services.

However, if you do not want to receive marketing offers from us, please contact our office.

3.7 Access to your personal information

You can request access to your personal information we hold. You can also ask for corrections to be made. To do so, please contact us.

In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

3.8 What if you have a concern or complaint?

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints may take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

www.oaic.gov.au

3.9 Updates to our Privacy Policy

We may change the way we handle personal information from time to time. If we do so, we will update this Privacy Policy. Our updated Privacy Policy will be made available on our website or by calling our office.

4. Use or disclosure of personal information

If we collect personal information for a specific purpose (e.g. to provide financial services to you), we will not use or disclose the information for another purpose unless you consent to the use or disclosure of the information or an exception in the APPs applies.

Some cases where this may arise include:

- Doctors, medical services or other organisation to help assist with the collection of information for an insurance application or a claim;
- Any fund (investment administrator or superannuation trustee) to which your benefit is transferred, created or rolled over;
- Your employer where it relates to your employer sponsored superannuation arrangement;
- Your personal representative or any other person who may be entitled to receive your death benefit;
- An external dispute resolution service, insurer or legal representative (where required or applicable);
- The policy owner (where you are the life insurer but not the owner); □
Exchange of information with authorised financial institutions to confirm bank account details for payment;
- Service providers that maintain, review and develop our business systems;
- Regulatory bodies (including the Australian Securities and Investment Commission) as required by law.

If required by law or a regulatory body to do so, PlanningSolo Licensing Pty Ltd and our Authorised Representatives will comply and provide the appropriate body with the required information.

4.1 Direct Marketing

We may use and disclose your personal information to keep you informed about the range of financial products and services that we think may be relevant or of interest to you.

You can opt out of receiving direct marketing information from us at any time by contacting us.

4.2 Disclosure of information overseas

From time to time we may send your information overseas to our service providers or other third parties who operate or hold data outside Australia.

Where we do this, we make sure that appropriate data handling and security arrangements are in place.

4.3 Tax File Numbers

PlanningSolo Licensing Pty Ltd and our Authorised Representatives may need to collect your tax file number to provide you with a product or a service (for example, superannuation or income protection advice).

However this information will be kept securely and destroyed or we will permanently de-identify TFN information where it is no longer required.

5. Security and access to your personal information

5.1 Information accuracy

We take reasonable steps to ensure that all personal data collected is accurate, up to date and complete. You can ask us to correct any inaccurate information we hold or have provided to others by contacting us using the details in this policy.

If the information that is corrected is information we have provided to others, you can ask us to notify them of the correction.

5.2 Security of personal information

We take care to protect the security of your personal information. We may hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats.

We take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure.

These include instructing our staff and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals. This incorporates ongoing training about the serious responsibility we have in holding personal and private information.

Please note, we are required by law to retain your personal information for a specific amount of time. We will generally destroy or de-identify personal information if it is no

longer required.

5.3 Access to and correction of personal information

You are able to access any personal information that is held by PlanningSolo Licensing Pty Ltd or our Authorised Representatives subject to limited exceptions or required by law.

The following factors will be considered:

- The information is related to a commercially sensitive decision making process; Access would be unlawful;
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice an investigation of possible unlawful activity.

To access the information, you will need to contact the Privacy Officer as detailed in this policy.

You may be charged a small fee applicable to the collection and provision of your personal information but will be notified of this fee prior to processing their request.

The PlanningSolo Licensing Pty Ltd Privacy Officer will be able to advise you how long it will take to provide the information.

Generally however, you will receive the requested information within 14 days of the request.

If you believe that the personal information we hold about you is incorrect, you have a right to request your personal information be corrected.

Where we are unable to provide you with the information you have requested or correct your information, we will inform you and explain the reasons why.

5.4 Data breach

A data breach occurs when personal information held by us is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference.

Examples of a data breach are when a device containing personal information of clients is lost or stolen, or when a database containing personal information is hacked or if we mistakenly provide personal information to the wrong person.

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017, we have an obligation to assess within 30 days whether a data breach amounts to an 'eligible data breach' if we become aware that there are reasonable grounds to suspect that data breach may have occurred.

If we form the view that the data breach would likely result in serious harm to any of the individuals to whom the information relates despite any remedial action taken by us, then the data breach will constitute an 'eligible data breach'.

If an eligible data breach occurs, we have an obligation to notify you and the Office of the Australian Information Commissioner and of the details of the eligible data breach.

6. Complaints and Contacts

You may wish to contact us for the following:

- a) find out what personal information we hold about you;

- b) update or correct the personal information we hold about you;
- c) opt out of receiving direct marketing material
- d) make a privacy related complaint.

Should you wish to do so, please contact us on the details below:

PlanningSolo Licensing Pty Ltd Privacy Officer

Name: Jordan Vaka
Phone: 0414 318 048
Email: jordan@planningsolo.com.au
Post: PO Box 34, SEAFORD VIC 3198

6.1 Complaints

We take your privacy seriously and any complaints you may have will be addressed through our complaints handling process.

All complaints will be given fair consideration and we will aim to resolve them within 45 days.

We encourage you to submit your complaint to the Privacy Officer (details above) either via email to post.

Where it is found that we are unable to finalise the investigation of your complaint within 45 days, we will contact you to request an extension.

If you believe you did not receive a satisfactory resolution to your concern, you may contact the Office of the Australian Information Commissioner.

You are able to do so by:

- Visiting www.oaic.gov.au and submitting an online form;
- Obtaining a hard copy form at www.oaic.gov.au/about-us/contact-us-page;
- Phone: 1300 363 992;
- Fax: 02 9284 9666;
- Email: enquiries@oaic.gov.au

