

When you trust us with your personal information, you expect us to protect it and keep it safe.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles. 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 more information about how we protect your privacy, please contact us.

About this policy

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we 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.

What kinds of personal information do we collect and hold?

When you apply for our products or services we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. If you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide you with products and services. This includes:

- checking whether you are eligible for the product or service;
- assisting you where online applications are not completed;
- providing the product or service; and
- helping manage the product or service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or if you send us electronic correspondence (see "Do we collect personal information electronically?").

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth); and Securitor Practice Privacy Policy V0.1 12 Mar 2014

- certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).

How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia, New Zealand and the United States and owned by external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. 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 employees are required to complete training about information security; and
- we regularly monitor and review our compliance with 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.

We can aggregate your non-personally identifiable data by allowing us to track all of your electronic income and expenditure financial transactions via the Xero Service. You agree that we can access, aggregate and use non-personally identifiable data Xero has collected from you. This data will in no way identify you or any other individual.

We may use this aggregated non-personally identifiable data to:

- assist us to better understand how our customers are using the Service,
- provide our clients with further information regarding the uses and benefits of the Service,
- enhance small business productivity, including by creating useful business insights from that aggregated data and allowing You to benchmark Your personal performance against that aggregated data, and
- otherwise to improve the Service.

Who do we disclose your personal information to, and why?

We may provide personal information about our clients to organisations outside Michael Chettle Financial Planning Pty Ltd. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- paraplanning service providers;

- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments);
- other organisations, who jointly with us, provide products or services to you;
- financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;
- debt collectors;
- our, legal advisers or auditors;
- your representatives (including your legal adviser, accountant, mortgage broker, , executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- IT Service Providers;
- Our Licensee, Securitor Financial Group Limited ("Securitor") and their related entities;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside Michael Chettle Financial Planning where:

- we are required or authorised by law or where we have a public duty to do so;
- you may 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.

Do we disclose personal information overseas?

We may disclose your personal information to a recipient which is located outside Australia. This includes:

- Any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.