

# Privacy Policy

Your privacy is important... especially when you consider the number of ways we communicate and interact these days. That's why we've put together this statement. It explains how we collect, hold, use and disclose your personal information and who we share it with.

And because it's guided by privacy laws, you can be sure it takes your rights seriously.

Above all, this statement is your assurance that we never talk you privacy for granted and always take the utmost care in protection your personal information.

Throughout this document, we will refer to ourselves, Caboodle Financial Services, as 'the Group'.

## Why do we collect personal information?

Personal information is information or an opinion about an identified individual or an individual who is reasonably identifiable. We collect personal information so that we can:

- identify you and conduct appropriate checks;
- understand your requirements and provide you with a service including advice and assistance with the provision of a product;
- manage, train and develop our employees and representatives;
- manage complaints and disputes, and report to dispute resolution bodies; and
- get a better understanding of you, your needs, your behaviours and how you interact with us, so we can engage in product and service research, development and business strategy including managing the delivery of our services via the ways we communicate with you and the advice we provide.

## What happens if you don't give us your personal information?

If we ask for your personal information and you don't give it to us, we may not be able to provide you with any, some, or all of the features of our services such as advice, or the advice we provide may not be appropriate.

## How we handle your personal information

We collect your personal information directly from you and, in some cases, from other people or organisations. We also provide your personal information to other related companies in the Group, and they may disclose or use your personal information for the purposes described in 'Why do we collect personal information?' in relation to the products and services they may provide to you. They may also use your personal information to help them provide products and services to other customers, but they'll never disclose your personal information to another customer without your consent

Under the following Australian laws we may be authorised or required to collect your personal information: Australian Securities and Investment Commissions Act 2001; Corporations Act 2001; Anti Money Laundering and Counter Terrorism Financing Act; Anti Money Laundering and Counter Terrorism Financing Rules Instrument 2007 (No. 1), Life Insurance Act 1995 Income Tax Assessment Act 1936, Income Tax Assessment Acts 1997; Taxation Administration Act 1953 Superannuation Guarantee (Administration) Act 1992, Small Superannuation Accounts Act 1995, Superannuation (Unclaimed Money and Lost Members) Act 1999, Superannuation (Resolution of Complaints) Act 1993, Superannuation (Government Co-contribution for low income earners) Act 2003 and Family Law Act 1975 (Part VIII B) as those acts are amended and any associated regulations. From time to time other acts may require, or authorise us to collect your personal information.

The logo for Caboodle, featuring the word "caboodle" in a lowercase, rounded, green font.

We will use and disclose your personal information for the purposes we collected it as well as purposes that are related, where you would reasonably expect us to. We may disclose your personal information to and/or collect your personal information from:

- other companies within the group and other trading divisions or departments within the same company;
- any of our Group joint ventures where authorised or required;
- customer, product, business or strategic research and development organisations;
- data warehouse, strategic learning organisations, data partners, analytic consultants;
- any entity where disclosure to, or collection from, such entity is required or authorised by law;
- social media and other virtual communities and networks where people create, share or exchange information;
- publicly available sources of information;
- a third party that we've contracted to provide financial services, financial products or administrative services – for example: information technology providers, administration or business management services, consultancy firms, auditors and business management consultants, marketing agencies and other marketing service providers, print/mail/digital service providers, imaging and document management services;
- any intermediaries, including your agent, adviser, a broker, representative or person acting on your behalf, other Australian Financial Services Licensee or our authorised representatives, advisers and our agents;
- legal, accounting or finance professionals and advisers;
- the Financial Ombudsman Service or any other external dispute resolution body;
- an employer, trustee or custodian associated with membership of a superannuation fund, investment/managed fund or life insurance policy;
- Powers of Attorney or Guardians;
- government, statutory or regulatory bodies and enforcement bodies;
- policy or product holders or others who are authorised or noted on the policy as having a legal interest, including where you are an insured person but not the policy or product holder;
- other insurers, reinsurers, insurance investigators and claims or insurance reference services, loss assessors, financiers;
- and hospitals and medical, health or wellbeing professionals.

We'll use a variety of methods to collect your personal information from, and disclose your personal information to, these persons and organisations, including written forms, telephone calls and via electronic delivery. We may collect and disclose your personal information to these persons and organisations during the information life cycle, regularly, or on an ad hoc basis, depending on the purpose of collection.

### **Overseas disclosure**

Sometimes, we need to provide your personal information to – or get personal information about you from – persons located overseas, for the same purposes as in 'Why do we collect personal information?'

## **Your personal information and our marketing practices**

Every now and then, we and any related companies that use the Caboodle Financial Services brand might let you know – including via mail, SMS, email, telephone or online – about news, special offers, products and services that you might be interested in. We will engage in marketing unless you tell us otherwise. You can contact us to update your marketing preferences at any time.

In order to carry out our direct marketing we collect your personal information from and disclose it to others that provide us with specialised data matching, trending or analytical services, as well as general marketing services (you can see the full list of persons and organisations under ‘How we handle your personal information’). We may also collect your personal information for marketing through competitions and by purchasing contact lists.

We, and other people who provide us with services, may combine the personal information collected from you or others, with the information we, or companies in our Group, or our service providers already hold about you. We may also use online targeted marketing, data and audience matching and market segmentation to improve advertising relevance to you.

## **How to access and correct your personal information or make a complaint**

You have the right to access and correct your personal information held by us and you can find information about how to do this below.

The Policy also includes information about how you can complain about a breach of the Australian Privacy Principles and how we’ll deal with such a complaint.

## **Contact us**

For more information about our privacy practices including overseas disclosure, or to tell us about your marketing preferences visit our website [caboodlefs.com.au](http://caboodlefs.com.au) or give us a call on 1300 652 944.