



PRIVACY POLICY

Our Commitment

At Unified Financial Services Pty. Ltd. (UFS), 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 Australian Privacy Principles (AAP) as defined in the Privacy Amendment (Enhancing Privacy Protection) Act 2012, and abide by these principles as detailed herein.

If Unified Financial Services are required by law to release information about our client's or their organization we must fully co-operate as permitted under the Privacy Amendment Act. We will advise the client where any information is provided under these conditions.

In this Privacy Policy, 'we', 'us' and 'our' refers to Unified Financial Services Pty Ltd.

1. Collection of Personal Information

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 quality and comprehensive financial planning and advice service depends on us obtaining certain personal information about you, including:

- a) personal or company name;
- b) address and contact details;
- c) date of birth;
- d) marital status;
- e) employment details, including history;
- f) tax file number, ABN and registered business number;
- g) bank account/credit card details;
- h) details of your financial needs and objectives;
- i) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, tax information, insurance cover and superannuation;
- j) details of your investment preferences and aversion or tolerance to risk;

- k) information about your family structure;
- l) commitments and social security (Centrelink) eligibility;
- m) health status;
- n) medical history and reporting for the purpose of risk insurance.

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 service agreement 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 conducted directly in face-to-face interviews, over the telephone or by email/fax. Additional and/or updated personal information may be collected through one or more of those methods.
- 1.3.3 Sometimes it may be necessary to collect information from a third party. For example, we may collect information from their personal representative or a publicly available record, amongst other sources.
- 1.3.4 We may also collect personal information from the use of our website and information provided to us through the registration process on our website, including newsletter subscription or completion of the health check questionnaire.

2 Use of Personal Information

- 2.1 The personal information which is provided to Unified Financial Services is used for a number of purposes including:
 - a) the provision of quality financial planning, investment and insurance advice services to you in a professional and efficient manner;
 - b) to respond to requests;
 - c) to maintain contact with our clients and business associates;

- d) to keep our clients and other contacts informed of our range of services, current changes in the industry /legislation and to notify of upcoming events;
- e) for administrative purposes;
- f) for credit reporting;
- g) for the engagement of contractors or suppliers relating to the operation of our business;
- h) for other business related purposes.

2.2 We may use the personal information collected from you for the purpose of providing you with direct marketing material such as newsletters, blog updates, articles or services that may be of interest to you. However you may, by either replying by email to request to unsubscribe to our electronic communication, or contacting us by any of the methods detailed in this policy under "Contact Us", request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

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

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

3 Data Quality

3.1 Pursuant to the Corporations Act we are required to collect sufficient information to ensure the services we provide and the advice we give is accurate and valuable. If client's elect not to provide us with the personal information needed, we will not be able to provide them with the quality of service they deserve.

3.2 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 Disclosure of Personal Information

4.1 Unified Financial Services will not release any personal information, except as required by law and as set out in this Privacy Policy, to any third party, without the consent of our clients.

4.2 If Unified Financial Services releases personal information to a third party, we will do so in accordance with the purpose for which the personal information was collected, or a related purpose.

4.3 We may use the information collected from clients for the purpose of referring them to another financial service provider if required, and with their permission.

The types of third parties we may disclose information to might include:

- a) experts or third parties contracted as part of an engagement
- b) our service providers
- c) our professional advisors
- d) your financial institution (if requested).

4.4 We may disclose your personal information to external contractors/consultants for the following purposes, all contractors/consultants are bound by Confidentiality Agreements:

- a) IT provider – for data recovery.
- b) IRESS Wealth Management Pty Ltd – for IT assistance in relation to our database (Xplan) and financial planning modelling software.
- c) Astute Wealth Management - for assistance with client data collection and financial planning modelling software.
- d) Bookkeeping / Accounts – to settle your account.
- e) Accountants – To assist with preparing your tax return, we require your written authority.
- f) 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.
- g) Associated Advisory Practices and Centrepoint Alliance Limited – who perform our compliance audits.
- h) Business consultants including the Unified Financial Services Pty Ltd Panel of Advice – to provide recommendations on improving our business and client experience, this may include independent surveys of our clients.

It is a condition of our agreement with each of our external contractors/consultants 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 under “Contact Us” in this policy.

4.5 We will not disclose personal information to third parties for the purpose of allowing them to distribute marketing material to clients.

4.6 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.

4.7 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).

4.8 As a member of the Financial Ombudsman Service (FOS) we have an obligation to provide FOS with any information that is required in order to deal with a complaint (if the complaint can not be resolved internally).

- 4.9 We may disclose your personal information to another financial planner during periods when this office is unstaffed or closed so that you can be assured of receiving a continued service.
- 4.10 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.
- 4.11 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.
- 4.12 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.

5 Security and retention of personal information

- 5.1 Your personal information is held in your client file, within our secure online database Xplan, IRESS Wealth Management Pty Ltd, and on our computer server. All information is held within Australia.
- 5.2 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.

The security measures taken include:-

- 5.3 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. All internal office doors leading to filing cabinets are also 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.
- 5.4 All computer-based information is protected through the use of access passwords on each computer that are changed regularly (and always upon a staff member leaving the Firm).

- 5.5 Virus protection software is updated regularly.
- 5.6 Firewalls are present to block the route for 'hackers' to intrude into the Unified Financial Services information system.
- 5.7 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.
- 5.8 Unified Financial Services encourages a clean desk policy. All staff are trained and audited by IT support in security awareness, practices and procedures.
- 5.9 All staff check facsimile numbers and email addresses 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.
- 5.10 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 Unified Financial Services no longer requires your personal information it is permanently destroyed. Unified Financial Services 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.

6 Openness

- 6.1 Unified Financial Services will have clearly expressed policies on its management of personal information and these will continue to be readily available. Unified Financial Services 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.

7. Transborder Data Flows

- 7.1 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 Australian Privacy Principles.

8 Access or Correction of personal information held

Access to your personal information:

- 8.1 You may at any time, by contacting us by any of the methods detailed under “Contact Us” in this policy, request access to your personal information and we will, subject to limited exceptions permitted or required by law, 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.
- 8.2 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.
- 8.3 We will not provide you with access to your personal information if:
- (a) in the case of personal information other than health information—providing access would pose a serious and imminent threat to the life or health of any individual; or
 - (b) in the case of health information—providing access would pose a serious threat to the life or health of any individual; or
 - (c) providing access would have an unreasonable impact upon the privacy of other individuals; or
 - (d) the request for access is frivolous or vexatious; or
 - (e) the information relates to existing or anticipated legal proceedings between us and the information would not be accessible by the process of discovery in those proceedings; or
 - (f) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations; or
 - (g) providing access would be unlawful; or
 - (h) denying access is required or authorised by or under law; or
 - (i) providing access would be likely to prejudice an investigation of possible unlawful activity; or
 - (j) providing access would be likely to prejudice:
 - (i) the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law; or
 - (ii) the enforcement of laws relating to the confiscation of the proceeds of crime; or
 - (iii) the protection of the public revenue; or
 - (iv) the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
 - (v) the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders;
 - by or on behalf of an enforcement body; or
 - (k) an enforcement body performing a lawful security function asks us not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.

- 8.4 In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.
- 8.5 Unified Financial Services may charge the reasonable costs of providing our client's with access to their personal information if requested.

Correction Policies and Procedures:

- 8.6 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.
- 8.7 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.
- 8.8 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.

9. Commonwealth Government Identifiers

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

10. Anonymity

- 10.1 We will not give individuals the option of not identifying themselves when entering transactions with us as this is not lawful under Anti Money Laundering Legislation.

11. Sensitive Information

- 11.1 We will only collect sensitive information about an individual with consent or if required by law.
- 11.2 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.

- 11.3 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.

12. Privacy Complaint Procedures

- 12.1 If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed under "Contact Us" in this policy 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.**

13. Online Privacy Policy

- 13.1 The Unified Financial Services 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.
- 13.2 While it is not necessary to register your personal details to use our website, 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 email address.
- 13.3 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 email either as a reply to the email address you have received information from or to reception@unifiedfs.com.au requesting to be removed from our online registration database. Please allow 2 weeks for your request to be actioned.
- 13.4 You may amend or update your registration details by sending an email to reception@unifiedfs.com.au providing your amended details. Please allow 2 weeks for your request to be actioned.

13.5 Cookies

Cookies are pieces of data stored by a web browser on a computer's hard disk.

The cookie contains information about your visit to a website. 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 website again, the server looks for the cookie and structures itself based on the information provided.

Cookies identify the computer only – they do not personally identify individuals.

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 may use cookies to track the use of our website, and to compile statistics on visits to the site. When the website is visited a cookie may be placed on the computer.

When our website is visited, a record of the visit is automatically made which collects the following non-personal information:

- server address
- top level domain name
- date and time of the visit
- web pages accessed
- documents downloaded
- documents uploaded
- type of browser being used.

If client's or potential client's use the forms to send an email to someone at Unified Financial Services through the website, a record will also be made of their email address.

We use the statistical information to make our website more useful and to enhance the online experience.

13.6 Third Party Websites

Our website contains links to third parties' websites. Please note that these websites are not subject to our privacy policies and procedures.

Unified Financial Services does not endorse, approve or recommend the services and products provided on those third party websites.

14. New Services and Development

- 14.1 Unified Financial Services Pty Ltd will consider the privacy impact of new services before they are introduced.

15. Changes to this Privacy Policy

- 15.1 Our commitment to being a leading provider of quality services means that our business will continue to evolve as we develop and introduce new services. For this reason Unified Financial Services Pty Ltd reserves the right to change this Privacy Policy at any time without notice. Our client's should regularly review this Privacy Policy for any changes. Any amendments to the policy will be effective immediately.

16. Contact Us

Privacy Officer: Michelle Tate-Loverly

Address: Carlton Clocktower Complex
Suites 21-22
255 Drummond Street
Carlton, VIC 3053.

Telephone: (03) 9349 1525

Facsimile: (03) 9349 1530

email: reception@unifiedfs.com.au Attn: Michelle Tate-Loverly

Please feel free to examine the Government Privacy website at 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.