



BERESFORDS

— Wealth Management —

Privacy

POLICY

*Your privacy
is important
to us*

Beresfords Wealth Management Pty Ltd
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SYDNEY

MELBOURNE

BRISBANE

CANBERRA

BERESFORDS WEALTH MANAGEMENT PRIVACY POLICY

Privacy is important to us, so we know it's important to you too, and we want to assure you that protection of your information is treated with the utmost respect. The nature of our work with you requires you to share a considerable amount of personal information, which is a responsibility we take very seriously.

Introduction

This Privacy Policy governs the collection, use and disclosure of your personal information by Beresfords Wealth Management Pty Ltd, BLicensed Pty Ltd, and all of our representatives and related parties, including but not limited to Investment Partners Pty Ltd, Bselfmanaged Pty Ltd, Bfinanced Pty Ltd, The GoodWill Company Pty Ltd, Property Advisory Partners Pty Ltd and Bresourced Inc, their related entities, subsidiaries, employees and the financial adviser or credit representative that will assist you. All of these companies form part of the Beresfords Group of Companies, which will be referred to as ("we", "us" or "the Group"). This Privacy Policy sets out how we intend to respect your rights to privacy, in accordance with the Australian Privacy Principles contained in the Privacy Act 1988 (Cth).

How we collect personal information

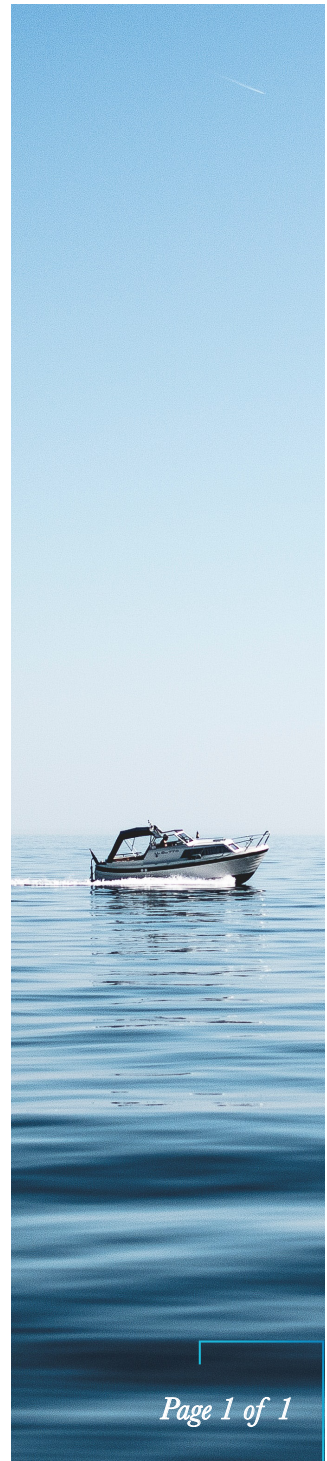
When we refer to "personal information", we mean any information from which your identity is reasonably apparent. This information may include information or an opinion about you, whether true or not. Where reasonable and practical, we will collect your personal information directly from you. We collect personal information from you through our financial advisers, our credit representatives and our administrative staff, during our interview process, from our website, from fact-find forms you submit, and from requests for information to which you choose to respond.

The personal information we collect

The information we collect, may vary relative to the service we are providing for you. The general type of personal information we collect may include your name, date of birth, address, account details, occupation and any other information we may need to identify you. If you are seeking financial planning advice, we may also collect the number and ages of your dependants, the length of time you have lived at your current address, your employment details, proof of income and expenses, details of your objectives, financial position and needs, and other financial details and relevant information regarding your personal circumstances. We will seek your consent before we collect sensitive information about you, unless the information is reasonably necessary for us to carry out our role or the collection is otherwise authorized or required by law. If you apply for an insurance product through us, we may also need to collect your health information. We will collect your health information only with your consent.

When seeking financial planning advice from us, we will make it clear what information we need to obtain from you for the purpose of providing appropriate financial planning advice, as well as any personal information that may be provided by you at your discretion. You may choose not to provide any optional information requested by us, however this may restrict our ability to assist you to the best of our ability.

If you do provide us with personal information about any other persons, you must provide them with a copy of this privacy policy and obtain their consent to our use of their information in accordance with our privacy policy before you disclose the information to us. In this case, we will request that the person you are representing sign an authorisation form to give their consent for you to disclose their personal information on their behalf. They may access any personal information we hold about them at any time.



We use your personal information to assist us to:

- ☐ Provide advice and make recommendations to you in respect of financial planning strategies;
- ☐ Make recommendations to you in respect of investment products and services, such as managed investment funds and investor directed portfolio services (IDPS);
- ☐ Make recommendations to you in respect of superannuation products, including self-managed superannuation funds (SMSF);
- ☐ Make recommendations to you in respect of investments in direct equities and stock exchange listed products;
- ☐ Make recommendations to you in respect of risk insurance products, such as insurance for your life, permanent disability, income replacement and critical illness cover;
- ☐ Assess your application for credit, and manage that credit application and any future applications for credit;
- ☐ Communicate information about our products and services to you;
- ☐ Meet our internal administrative, marketing, planning and research requirements;

We will take reasonable steps to destroy or de-identify your personal information when your personal information is no longer required for one of the above purposes.

Unsolicited Information

If we receive personal information about you which we did not request, we will assess the information to decide if it is reasonably necessary, or beneficial for the provision of our services to you. If we decide that it is, we will use such information in accordance with this privacy policy. Otherwise, we will destroy or de-identify the information, provided that it is lawful and reasonable to do so.

Disclosure of your personal information to others

Where possible, we will inform you, at or before the time of collecting your personal information, of the types of organisations to which we intend to disclose your personal information. We may disclose your personal information to our related bodies corporate, financial advisers, credit representatives, panel of financial product suppliers and advisers, service providers and agents that we use in the ordinary operation of our business. For example, if you provide us with personal information to assist us to apply for personal insurance on your behalf, we may need to collect personal information about you and disclose that information to one of our relevant product providers.

We will disclose your personal information only for the purpose/s for which we collected the particular personal information. Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- ☐ The person or organisation shares our commitment to protecting your personal information and that their privacy policy is at least equal to our own;
- ☐ Or, if required, you have consented to us doing so.



We will disclose your personal information only to those third parties where such disclosure is for the purposes required, and when we are required by law to do so. We may use secure cloud storage to store your personal information that we hold.

CROSS-BORDER DISCLOSURE INFORMATION

Beresfords has an offshore administration support team who are employed exclusively by our Filipino entity Bresourced Inc. We transfer information to this team to enable them to support our operations in Australia. Part of the employment contracts for all staff in the Philippines require them to abide by Australian Privacy Principles, as well as our own Privacy Policy.

We may also transfer information to external service providers in locations outside Australia, in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring information to any foreign jurisdiction, we always ensure that we satisfy at least one of the requirements below:

- ☐ We will take all reasonable steps to ensure the overseas recipient in question does not breach the Australian Privacy Principles in relation to the information;
- ☐ We form a reasonable belief that the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is substantially similar to the way in which the APP protect the information and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- ☐ We will seek your informed consent prior to disclosing your information overseas entities.

We will use our reasonable endeavours to limit the disclosure of your personal information to third party recipients that value your privacy and the protection of your personal information. However by engaging us to provide financial services and providing us with your consent to collect, use, disclose and hold your personal information in accordance with this privacy policy, you agree and acknowledge that:

NOTIFIABLE DATA BREACHES

In the unlikely event of a data breach, we will seek to take all reasonable steps to contain the breach and take remedial action. We are required to notify you and the Information Commissioner of an eligible data breach. An eligible data breach happens if:

- ☐ There is unauthorised access to, unauthorised disclosure of, or loss of personal information held by us; and;
- ☐ The access, disclosure or loss is likely to result in serious harm to you.

If you receive a statement of an eligible data breach from us, you should read and implement the recommendations about the steps you should take in response to the eligible data breach.

Direct Marketing

From time to time, we may use your personal information to provide you with current information about our service offerings, special offers you may find of interest, changes to our organisation, or new products and services being offered by us or any business with which we are associated. We do not sell your personal information to any third parties for direct marketing purposes.

If you do not wish to receive marketing information, you may, at any time, decline to receive such information by contacting us via the contact number or email address listed below. If the direct marketing is by email, you may also use the unsubscribe function included in all such emails to opt out of email communications at any time. We will take all reasonable steps to satisfy your request at the earliest possible opportunity.

Updating your personal information

To allow us to continue to advise you to the best of our ability, it is important to us that the personal information we hold about you remains accurate and up-to-date. During the course of our relationship with you, we will ask you to inform us as any of your personal information changes. If you wish to make any changes to your personal information, please inform us of the required change in writing. We will generally rely on you to assist us by keeping us informed of any changes, to ensure the information we hold about you is always accurate and complete.

We may also make changes to your personal information from time to time if we feel that it is inaccurate, out of date, incomplete, irrelevant or misleading.

Access to and correction of your personal information

You may request access to any of the personal information we hold about you at any time. To access your personal information that we hold, please use the contact details specified below. We will respond to you within seven days of receiving your request. We may need to contact third parties to properly investigate your request, and should this be the case, we will provide you with the outcome of our investigation within 30 days.

There may be situations where we are not required to provide you with access to your personal information. For example, if the information relates to existing or anticipated legal proceedings or if your request is vexatious. An explanation will be provided to you if we deny you access to the personal information about you that we hold.

If any of the personal information about you that we hold is incorrect, inaccurate or out-of-date, you may request that we correct the information. We will provide an initial response to you within seven days of receiving your request. Where reasonable and after our investigation, we will provide you with details about such correction of the personal information within 30 days.

We may need to consult with third parties as part of our investigation about the accuracy of the personal information about you that we hold. If we refuse to amend personal information, for any reason, we will provide you with our reasons for not amending the information.

Government Related Identifiers

If we collect government identifiers, such as your Tax File Number, we will not use or disclose this information, other than as required by law. We will never use a government identifier in order to identify you.



Business without identifying you

In most circumstances, it will be necessary for us to identify you in order to successfully do business with you. However, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information. For example, if you make general enquiries about interest rates or current promotional offers.

How we store your personal information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or exposure by:

- ❑ Installing security and access requirements for all our IT systems, such as passwords, firewalls and virus scanning software;
- ❑ Maintaining document storage and destruction policies;
- ❑ Providing your personal information to you only when we are satisfied as to your identity

We are bound by a regulatory requirement to store your personal information for a period of seven years after we cease to provide financial services to you. This information is archived in both electronic and paper form.

We require all of our staff to maintain the confidentiality of all customer information. Access to personal information is restricted to employees whose job responsibilities require access to the information. If we no longer need to hold your personal information, (after the 7-year period) it is securely destroyed or de-identified.

Contacting us and providing feedback

If you are not satisfied with how we have managed your personal information, you may contact our Privacy Officer - details below. We will acknowledge your complaint within seven days of receipt. We will provide you with a decision on your complaint within 30 days of receipt.

You can make any requests relating to your personal information held by us or any complaints regarding treatment of your privacy by contacting:

The Privacy Officer
Beresfords
Phone: 02 999 33 900
email: complaints@beresfords.com.au

Changes to this Privacy Policy

We may amend this Policy from time to time to comply with new laws or codes of practice that may be implemented. We may also change this Policy to include any new products or services that we may provide from time to time.

This Privacy Policy came into operation on 11th August 2020.



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