



Introduction

Fiducian respects your right to privacy and protecting your personal information. We are bound by the Australian Privacy Principles (APPs) in the Privacy Act 1988 (Commonwealth). Our staff are trained to respect your privacy in accordance with our standards, policies and procedures.

The Fiducian Group is Fiducian Group Limited (ABN 41 602 423 610) and its subsidiaries: Fiducian Portfolio Services Limited (ABN 13 073 845 931), Fiducian Investment Management Services Limited (ABN 28 602 441 814), Fiducian Services Pty Limited (ABN 41 602 437 892), Fiducian Financial Services Pty Ltd (ABN 46 094 765 134), Fiducian Resourcing Services Pvt. Ltd and Fiducian Business Services Pty Ltd (ABN 16 063 433 367). It includes all our activities such as funds management, financial planning, superannuation and investment services, administration and advice, life risk insurance, investment life insurance product advice and financial data processing.

About this Privacy Policy

This Privacy Policy outlines how we manage your personal information.

It also describes generally the sorts of personal information and sensitive information held and for what purposes, and how that information is collected, held, used and disclosed.

The information we collect

Personal information is information or an opinion that can be used to identify you, whether true or not and whether the information or opinion is recorded in a material form or not. The types of personal information we collect can be found in the questions we ask and in the forms we provide for you to complete.

We collect personal information on your contact details, financial situation, likes and dislikes. We may also collect sensitive information, for example, your medical and lifestyle information for risk insurance protection, which may include your sexual activity. We do not use or share that information for any purpose other than that for which the information is collected or approved by you, unless otherwise disclosed to you when the information is collected.

We do not collect information about your political or religious beliefs, or ethnic background unless it is required for a purpose specifically disclosed to you at the time of collection.

How we collect information

We collect most personal information direct from you or through your financial adviser. For example when you complete or help to complete a client questionnaire (which is required before we can prepare a statement of advice), or when you fill in an application form, notify a change of address, deal with us or

your financial adviser over the telephone, send us or your financial adviser a letter, visit our web site or meet with your financial adviser.

In certain cases we collect your personal information from other sources. For example, personal information may be given by your employer in relation to membership of a corporate superannuation fund or from a family member who nominates you as a beneficiary to their assets. We will take reasonable steps to let you know that we have the information. This may include asking the person who gave us your information to let you know that we have it.

If you provide incomplete or inaccurate information

We only collect personal information about you that is necessary to perform our functions and activities. If you do not provide this information or provide incomplete or inaccurate information, we may not deal with you or otherwise we may not be able to provide you with the products or services you are seeking.

How that information is used

We collect personal information to provide you with and to administer products and services you request (including financial planning and advice).

Personal information may be used and disclosed within Fiducian to develop suitable financial planning strategies, administer our products and services, and as well as for prudential and risk management purposes. This includes disclosure to, and use by, a custodian who will hold your assets in safe keeping for you.

The information may also be used to:

- tell you about products and services or recommend financial investments (unless you have asked us not to);
- maintain your relationship with us and with your financial adviser; and
- comply with legislative and regulatory requirements - this may include making certain records available for inspection by the Australian Securities and Investments Commission, Australian Prudential Regulatory Authority, Australian Taxation Office and AUSTRAC.

Tax file numbers or other government identifiers

We only use and disclose your tax file number or other government agency identifier for the purposes required by law, such as disclosing your TFN to the Australian Taxation Office.

Disclosing to third parties

We only disclose your personal information to third parties with your express or implied consent, or where we are otherwise entitled or required to do so by law, or for the delivery of the product or service requested by you. The types of third parties we may disclose your personal information to include:

- our agents, contractors and external advisers who carry out some of our functions and activities;
- any person acting on your behalf, or nominated by you to receive certain information, including your financial adviser, broker, solicitor or accountant (unless you tell us not to);
- the Australian financial services licensee with whom your financial adviser is associated;
- another financial adviser within the Fiducian Group to ensure continued service if your financial adviser is unavailable for any reason;
- your executors, administrator, trustee, guardian or attorney;
- regulatory bodies, government agencies, law enforcement bodies, courts and other parties we are authorised or required by law to disclose information to;
- any person who introduces you to us;
- any financial institution nominated by you - for example in a direct debit;
- external product providers for which we act as agents or which provide products and services in conjunction with us;
- auditors;
- insurers, including proposed insurers;
- claims assessors and investigators, claims managers, and reinsurers;
- medical practitioners;
- external dispute resolution bodies (such as Financial Ombudsman Service or Superannuation Complaints Tribunal); and
- outsourcing arrangements as mentioned below.

Outsourcing

We may disclose personal information to external organisations that help us provide services. For example, we may outsource financial data processing, as nominated by you in a Service Request. We may provide names and addresses to a mailing house to mail account statements to you and other clients. We may also seek expert help from time to time to improve our IT systems and communication delivery method. We outsource aspects of administration of our life risk insurance business. These organisations are bound by confidentiality arrangements.

In engaging in the above outsourcing arrangements, we may disclose personal information to a service provider that is located outside Australia. We currently have external service providers located in India.

Service providers are required to take reasonable steps to protect personal information from unauthorised use or disclosure and to comply with Australian Privacy Principles (APPs). Where we propose to use a service provider in a foreign jurisdiction that does not have privacy laws that are substantially similar to the APPs we will either seek your consent to disclose your personal information to that service provider or impose contractual requirements on the foreign service provider that are substantially equivalent to the APPs.

Keeping information up-to-date

Our aim is to ensure that the personal information we hold is accurate, complete and up-to-date. Please tell your financial adviser or us if any of your details change. Please also tell your financial adviser or us if you believe that the information we have about you is not accurate, complete or up-to-date.

Keeping information secure

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

We have physical, electronic and procedural safeguards to protect your information that is held by us. For example your personal information is stored in secured office premises, in electronic databases requiring logins and passwords for access and at secured offsite storage facilities. Access to information stored electronically is restricted to staff whose job requires access.

We destroy information we no longer need

We will destroy personal information if it is no longer needed:

- for the purposes for which it was collected; or
- for the purposes of meeting legal requirements.

We will properly dispose of all paper files, letters, correspondence and any other hardcopy documents that contain personal information that is no longer needed.

We use secure methods to destroy or de-identify any personal information as soon as the law permits, provided the information is no longer needed by us for any purpose. Ordinarily, information about a particular account, is maintained for at least seven years, or as otherwise required by law.

You can request details about your information

You can ask us to give you access to the personal information we hold about you.

We are permitted under the Privacy Act to deny or limit access in certain circumstances, but if this happens we will give you the reasons why we have not given the access to you.

We may charge a fee for processing your request if we spend time on locating, collating and explaining the information, or incur copying costs or out-of-pocket expenses such as freight or travelling costs to obtain the information. This fee will enable us to recover our costs.

Resolving Privacy Issues

If you have any privacy concerns you may raise those with your financial adviser or directly to us by:

- writing to: Privacy Officer
Fiducian Portfolio Services Limited
PO Box 4175, Sydney NSW 2001
- email at: info@fiducian.com.au
- telephone: 1800 653 263

we will then respond to your concerns within a reasonable timeframe.

Should this not resolve your concerns you may then contact the Financial Ombudsman Service (FOS), an independent external dispute resolution scheme as follows:

- visiting: www.fos.org.au
- writing to: Financial Ombudsman Service
GPO Box 3
Melbourne, VIC 3001
- telephone: 1300 78 08 08

Should FOS be unable to resolve your concerns then contact the Office of the Australian Information Commissioner (OAIC) who is responsible for the regulation of privacy under the *Privacy Act 1988* as follows:

- visiting: www.oaic.gov.au
- writing to: Office of the Australian Information
Commissioner
GPO Box 5218
Sydney, NSW 2001
- telephone: 1300 363 992

How to request access

A request for access to personal information may be made to your financial adviser or direct to us by

- writing to: Privacy Officer
Fiducian Portfolio Services Limited
PO Box 4175, Sydney NSW 2001
- email at: info@fiducian.com.au
- telephone: 1800 653 263

Changes to our privacy and information handling practices

We may amend our privacy and information handling practices from time to time. We will notify you of any of the changes to our policy that requires your consent before being implemented.

Collection Notice

This Privacy Policy also satisfies our obligations under APP 5 to provide a Collection Notice.