



Innate Wealth Pty Ltd

# Privacy Policy

Version 3.00  
Date: 2 July 2019

## 1. Privacy Statement

Innate Wealth Pty Ltd is committed to ensuring the confidentiality and security of your personal information. This Privacy Policy outlines how we collect and manage the personal information we hold about you.

## 2. National Privacy Principles

Innate Wealth Pty Ltd operates in accordance with the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2001. Our Privacy Policy sets out our commitment to being open and transparent with you about how we use your personal information.

We require each of the Innate Wealth Authorised Representatives to adopt and adhere to our Privacy Policy.

## 3. Collection of Personal Information

Innate Wealth Pty Ltd will only collect information from you where we believe it is necessary to provide you with financial planning services.

As a provider of financial planning services we are subject to certain legislative and regulatory requirements which require us to obtain and hold detailed information which personally identifies you and/or contains information or an opinion about you. Our ability to provide you with comprehensive financial planning services and advice is dependent on us obtaining certain personal and sensitive information about you, which may include (but not limited to):

- Name and address;
- Date of Birth;
- Contact details;
- Employment details and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- Details of any entities you have in place or act as a Director of;
- Details of your investment preferences and aversion or tolerance to risk;
- Details of your social security eligibility;
- Details of your estate planning requirements and instructions; and
- Health information (for some types of insurance).

Where reasonably possible and practical we will only obtain information directly from you or with your consent to gain information from a third party in relation to certain products or other details. This may take the form of face to face meetings, telephone discussions, email correspondence, data

collection forms, electronic means and from maintaining records during the course of providing ongoing financial services.

You can elect not to provide us with your personal and sensitive information however in doing so we may not be able to provide you with the financial services requested. Alternatively it may expose you to higher risks in respect of the recommendations made to you as it may affect the appropriateness of the financial advice or service provided to you.

## 4. Use and disclosure of Collected Information

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:

- The preparation of your statement of advice;
- The provision of financial planning advice and services to you;
- Making insurance, securities and investment recommendations;
- Implementing recommendations made to you;
- Reviewing your statement of advice;
- Reviewing insurance, securities and investment recommendations;

We will not use or disclose Personal Information collected by us for any purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

To enable us to execute the financial services provided to you, it may be necessary for us to disclose your information to third parties, naturally with your consent. The types of organisations to whom we may disclose your personal information are as follows:

- Financial institutions for the provision of financial products such as investments, superannuation, and life insurance;
- Organisations undertaking compliance reviews of our financial advisers or reviews of the accuracy and completeness of our information;
- Organisations providing management and administrative services in relation to your investment portfolio, mailing services, maintenance of information technology services and printing standard documents and correspondence;
- Employees of your adviser or your adviser's business;
- Organisations we may contract with to provide us with a service (such as software providers); or

- We may share your information with other companies related to us, such as an Accountant, within Australia. This information may be used to enable any of us to offer you goods and services which may interest you.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia 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. 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.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. However you may, by contacting your Authorised Representative, request not to receive such information and they will give effect to that request. Please allow 2 weeks for your request to be actioned.

## 5. Document security and storage

Your personal information is maintained securely and is generally held in your physical client file or within our secure company database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, medication or disclosure.

In the event that you cease to be a client of Innate Wealth, any personal information which we hold about you at that time, will be maintained for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

## 6. Data Quality

It is our aim to ensure the information we hold about you is accurate, complete and up to date. Part of our services to you may include an annual review of your circumstances. At this annual review we will ask for your confirmation as to the accuracy of the information we hold. If you believe at any stage the information we hold is inaccurate or incomplete in any way, please contact us and provide evidence of the inaccuracy. If the information we hold is wrong we will correct it.

## 7. Access

You may request access to your personal information by contacting our Authorised Representative or Privacy Officer. We will (subject to the following exceptions) 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. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your personal information if:

- Providing access would pose a serious threat to the life or health of a person;
- Providing access would have an unreasonable impact on the privacy of others;
- The request for access is frivolous or vexatious;
- The information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- Providing access would be unlawful;
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice certain operations by or on behalf of enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

## 8. Identifiers

We will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers, Medicare Numbers etc.

## 9. Our website and Cookies

When you visit our website, details may be recorded about your visit, such as time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and contains information enabling Innate Wealth's website to recognise your browser. If you do not wish to permit the use of cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

## 10. Our website and Cookies

When you visit our website, details may be recorded about your visit, such as time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and

contains information enabling Innate Wealth's website to recognise your browser. If you do not wish to permit the use of cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

## **11. Our website and Links to Third Parties**

Our website may have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by our Privacy Statement and these websites are not subject to our privacy standards and procedures.

## **12. Privacy Queries and Complaints**

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact our Compliance Manager on 03 9336 7800 or alternatively you may wish to put your complaint in writing and forward it to:

Compliance Manager  
Innate Wealth Pty Ltd  
P.O. Box 380  
Keilor Vic, 3036

We will endeavor to resolve any complaint to your satisfaction. However, if we are unable to satisfactorily resolve your concerns you can contact the Office of the Privacy Commissioner who may investigate your complaint further.

## **13. Changes to this Privacy Policy**

We reserve the right to review and amend this Privacy Policy from time to time. Innate Wealth reserves the right to change this Privacy Statement at any time without notification.

## **14. Additional Privacy Information**

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.