PRIVACY POLICY

Finlife Advice Pty Ltd

Effective date: 28 July 2026

Entity	Finlife Advice Pty Ltd ABN 24 640 165 564
Authorisation	Corporate Authorised Representative No. 001289197 of Lifestyle Asset Management Pty Ltd ABN 58 113 067 968, AFSL 288421
Privacy contact	Privacy Officer — finlifepa@finlifewc.com.au | 1300 555 245
Website	www.finlifeadvice.com

Finlife Advice respects your privacy and is committed to handling personal information openly, securely and responsibly. This policy explains the kinds of personal information we collect and hold, how we handle it, and the choices and rights available to you.

1. About this policy

This Privacy Policy applies to personal information handled by Finlife Advice Pty Ltd (Finlife Advice, we, us or our) in connection with our financial advice business, website, communications and related services.

Finlife Advice is a Corporate Authorised Representative of Lifestyle Asset Management Pty Ltd (LAM), the holder of Australian Financial Services Licence 288421. Personal information collected by Finlife Advice may also be held or handled by LAM for licensing, supervision, compliance, record-keeping, complaints management and other lawful purposes. This policy should therefore be read together with LAM's Privacy Policy and any collection notice provided when information is collected.

LAM Privacy Policy: lamfs.com.au/disclousures/privacy-policy

We handle personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), the Privacy (Tax File Number) Rule 2015 where applicable, financial services laws, and relevant LAM policies and procedures.

This policy is not a substitute for a specific collection notice. We may provide additional notices where the circumstances of a particular collection require more detail.

2. What personal information we collect and hold

The personal information we collect depends on the nature of your relationship with us and the services you request. It may include:

- Identity and contact information, including your name, date of birth, residential and postal address, email address, telephone number, signature, citizenship, residency and tax residency details.
- Identity verification information, including details from passports, driver licences, Medicare cards or other identification documents, and the results of electronic identity checks.
- Financial information, including income, expenses, assets, liabilities, bank details, investment holdings, superannuation and pension interests, insurance policies, tax information and, where lawfully required, tax file number information.

- Personal and family circumstances, including marital status, dependants, beneficiaries, employment, occupation, business interests, estate-planning arrangements and information relevant to joint or family advice.
- Advice information, including your objectives, priorities, preferences, risk profile, financial literacy, strategies considered, records of meetings and communications, authorities, advice documents, product applications, transactions and review information.
- Sensitive information, such as health or medical information relevant to insurance advice, applications, underwriting or policy servicing, and any other sensitive information that is reasonably necessary for our functions and collected with consent or as otherwise permitted by law.
- Service and complaint information, including enquiries, feedback, complaints, consents, authorities, billing records and records required to demonstrate compliance with financial services laws.
- Website and technical information, such as IP address, browser and device information, pages visited, referral source, cookies, form submissions and security or access logs.

We may also collect personal information about a spouse, partner, dependant, beneficiary, trustee, director, employee, authorised representative or other person connected with your advice. If you provide another person's information, you should ensure that you are authorised to do so and, where appropriate, make them aware of this policy.

We do not intentionally collect more personal information than is reasonably necessary for our functions and activities.

3. How we collect personal information

We usually collect personal information directly from you, including when you:

- contact us, submit a website enquiry or ask for information about our services;
- complete a fact find, questionnaire, authority, application or other form;
- attend a meeting, speak with us by telephone or communicate by email, post, video conference or secure portal;
- become a client, request advice, ask us to implement or review advice, or use an ongoing service;
- provide documents, records or information through an adviser, accountant, solicitor or other authorised person.

Where permitted, we may collect information from other sources, including:

- LAM, our advisers, representatives, staff and contractors;
- your spouse, partner, family member, attorney, trustee or other authorised representative;
- accountants, solicitors, employers, financial institutions, superannuation funds, insurers, product issuers, platforms, investment managers, share registries and other service providers;
- identity verification providers, government agencies, regulators, dispute-resolution bodies and publicly available sources.

If we receive unsolicited personal information, we will determine whether we could have lawfully collected it. If not, and where lawful and reasonable, we will destroy or de-identify it.

4. Anonymity and pseudonymity

You may deal with us anonymously or using a pseudonym where it is lawful and practicable. In most financial advice and client-service circumstances, however, we must know who you are to verify identity, comply with law, understand your circumstances, provide appropriate advice, implement instructions and maintain required records.

5. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information for purposes including:

- responding to enquiries and communicating with you;

- assessing whether and how we can assist you and establishing our client relationship;
- understanding your objectives, financial situation and needs and providing financial advice;
- preparing, presenting, implementing, monitoring and reviewing advice and agreed services;
- assisting with product applications, transactions, superannuation, investment and insurance arrangements where authorised;
- verifying identity, preventing fraud, managing conflicts and meeting legal, regulatory, professional and licensee obligations;
- maintaining advice, service, compliance, billing, complaint and business records;
- managing risk, cyber security, quality assurance, audits, professional indemnity and dispute resolution;
- improving our services, website, communications and client experience;
- sending service updates and, where permitted, information about services that may be relevant to you.

If you do not provide information we reasonably require, we may be unable to respond fully, provide or implement advice, recommend or arrange a product, or continue providing services.

6. Sensitive information and tax file numbers

We collect sensitive information only where it is reasonably necessary for our functions and activities and you consent, or where collection is otherwise permitted or required by law. Health information may be relevant when providing personal insurance advice or assisting with an insurance application or policy matter. We will use and disclose sensitive information only for the purpose for which it was collected, a directly related purpose you would reasonably expect, with consent, or as otherwise permitted by law.

Where we lawfully receive tax file number (TFN) information, we handle it in accordance with the Privacy (Tax File Number) Rule 2015 and applicable taxation, superannuation and financial services laws. We do not use a TFN as a general identifier and restrict access to people who require it for a lawful purpose.

7. Who we may disclose personal information to

We may disclose personal information, where reasonably necessary and lawful, to:

- LAM and its officers, employees, compliance personnel, auditors, professional advisers and service providers;
- Finlife Advice advisers, employees, contractors, paraplanners and administration or support personnel who require the information to perform their role;
- superannuation trustees, insurers, product issuers, investment platforms, banks, investment managers, share registries and other financial service providers;
- your nominated representatives, joint clients, accountants, solicitors, trustees, attorneys or other persons you authorise;
- identity verification, document execution, communication, customer relationship management, research, data storage, cloud, information technology, cyber security, website, printing, mailing, accounting and professional service providers;
- medical practitioners, medical information services and insurers where relevant and authorised for insurance purposes;
- courts, tribunals, regulators, government bodies, law enforcement agencies, dispute-resolution bodies and other persons where required or authorised by law;
- a prospective purchaser or successor of all or part of our business, subject to appropriate confidentiality and privacy safeguards.

We do not sell personal information. We require service providers to handle personal information only for authorised purposes and to apply appropriate confidentiality, privacy and security protections.

8. Direct marketing and service communications

We may use your contact details to send information about our services, financial education, events or updates where you have consented or where this is otherwise permitted by law. We will not use sensitive information for direct marketing without your consent.

You may opt out at any time by using the unsubscribe facility in the communication or contacting us. We will action an opt-out request within a reasonable period. Opting out of marketing will not prevent us from sending service, legal, regulatory or other non-marketing communications that are necessary for our relationship with you.

9. Website, cookies and online enquiries

Our website may use cookies, analytics and similar technologies to operate securely, remember preferences, understand website use and improve content. You can usually manage cookies through your browser settings, although disabling them may affect website functionality.

Information transmitted over the internet is not completely secure. Please do not send detailed financial, identification, medical or other sensitive information through a general website enquiry form or ordinary email unless we have advised that the method is appropriate. We may provide a secure method for exchanging documents.

Our website may contain links to third-party websites. We are not responsible for the privacy practices of those third parties, and you should review their privacy information before providing personal information.

10. Overseas disclosure and cloud services

Finlife Advice and LAM may use cloud-based, technology, communications, research, support or other service providers that operate, store information or provide access from locations outside Australia. As a result, personal information may be disclosed to, stored in, or accessible from overseas jurisdictions.

The locations used by service providers can vary and change over time. Where it is practicable to identify likely countries, we will state them in an applicable collection notice, service document or provide the available information on request. Before an overseas disclosure, Finlife Advice and/or LAM will take the steps required by applicable law and will consider the provider's privacy, confidentiality and security arrangements.

You acknowledge that overseas recipients may be subject to different privacy laws. Where Australian Privacy Principle 8 applies, Finlife Advice and/or LAM will take reasonable steps to ensure that the overseas recipient handles the information in a manner consistent with the APPs, unless an exception applies.

11. How we protect personal information

We take reasonable technical and organisational measures to protect personal information from misuse, interference, loss and unauthorised access, modification or disclosure. Depending on the circumstances, these measures may include:

- access controls, authentication, secure passwords and multi-factor authentication where available;
- encryption, secure portals, anti-malware, backups, monitoring and security updates;
- physical security for premises and paper records;
- confidentiality obligations, staff training and role-based access;
- due diligence and contractual controls for service providers;
- privacy, cyber security, incident-response and business-continuity procedures.

No security measure can eliminate every risk. If you become aware of a suspected privacy or security incident involving information provided to us, please contact us promptly.

12. Retention, destruction and de-identification

We retain personal information for as long as it is reasonably required for the purposes described in this policy and to meet financial services, taxation, corporate, legal, regulatory, insurance, professional and licensee record-keeping obligations. Retention periods vary depending on the type of record and the reason it is held.

When personal information is no longer required and we are not legally required or authorised to retain it, we take reasonable steps to destroy it securely or de-identify it. Some information may remain in secure backups until those backups are overwritten or retired in accordance with normal retention cycles.

13. Accessing and correcting your personal information

You may request access to personal information we hold about you and ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading. Please contact our Privacy Officer using the details at the end of this policy.

We may need to verify your identity before processing a request. We will respond within a reasonable period and provide access in the manner requested where reasonable and practicable. There is no charge to make a request. If we charge a reasonable cost for providing access, we will explain the cost before proceeding.

In limited circumstances, the law permits us to refuse access or correction. If we refuse, we will generally provide written reasons and explain the available complaint mechanisms. If we decline to correct information, you may ask us to associate a statement with the record.

14. Privacy complaints

If you believe we have mishandled your personal information or breached this policy, the APPs or an applicable privacy requirement, please contact our Privacy Officer. Please include enough detail for us to understand and investigate the issue.

We will acknowledge the complaint, investigate it fairly and seek to provide a written response within 30 days. More complex matters may take longer; if so, we will keep you informed. Because Finlife Advice operates under LAM's AFSL, we may refer or escalate the complaint to LAM where appropriate.

If your concern also relates to financial advice or another financial service, it may be handled under the complaints process described in our Financial Services Guide and LAM's Complaints Policy.

If you are not satisfied with our response to a privacy complaint, you may contact the Office of the Australian Information Commissioner (OAIC): oaic.gov.au or telephone 1300 363 992.

15. Data breaches

We maintain processes for assessing and responding to suspected data breaches. Where a breach is likely to result in serious harm and the Notifiable Data Breaches scheme applies, Finlife Advice and/or LAM will notify affected individuals and the OAIC as required by law.

16. Changes to this policy

We may update this policy to reflect changes to law, technology, service providers or our information-handling practices. The current version will be made available through our website. The effective date appears at the beginning of the policy.

17. Contact us

Privacy Officer
Finlife Advice Pty Ltd
Email: finlifepa@finlifewc.com.au
Telephone: 1300 555 245
Location: Queensland, Australia
Website: www.finlifeadvice.com/contact

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