

1. Objective of Policy

The objective of this Policy is to protect the privacy of individuals dealing with Us and to explain how We collect, use, disclose and store Personal Information in accordance with the APPs. This Policy also describes why We collect Personal Information and how You can access and correct Personal Information about You. This Policy does not cover information collected about employees.

2. Type of Personal Information collected

We may collect Personal Information or opinions about You in the normal course of Our dealings with You. This Personal Information is collected in order to conduct business with You. The Personal Information may include Your name, contact details, financial information or other information that is required by Us to conduct business with You. Sensitive Information about You, such as Your professional membership(s) and/or trade association membership(s), will not be collected without Your consent.

3. How We collect Personal Information

We collect Personal Information, directly from You by such means as company forms, credit applications, contracts, phone enquiries, mail, email or when You access Our website.

Personal Information provided to Us will always be handled by Us in accordance with this Policy and the APPs, regardless of who provides it.

4. Purposes for which Personal Information is collected

4.1 We collect Personal Information for one or more of the Primary Purposes.

4.2 We also collect Personal Information for one or more of the Secondary Purposes but only if it is related to one or the other of the Primary Purposes.

5. Notification of collection of Personal Information

If Personal Information about You is collected from someone other than You and if We are notified that You are not aware that We have collected the Personal Information then We will take reasonable steps to notify You that the Personal Information has been collected and will be dealt with in accordance with this Policy and the APPs.

6. Use or disclosure of Personal Information

We provide services to Our customers and licensees. In order to obtain these services, You will need to submit Personal Information to Us. However, Personal Information provided by You for the purpose of obtaining any services may be tracked, edited and/or disclosed in order to:

- provide You with the services You have requested;
- help Us develop, improve, manage and administer the services We provide to You;
- comply with the law;
- investigate, respond to and defend claims made against, or involving Us; and
- enforce a contract or agreement which We have with You.

We may also use Your email address to:

- send You follow-ups on services You have enquired about; and

- keep You informed of changes to the services offered by Us.

We also use the Personal Information that We collect for other purposes such as providing customer support, market research and obtaining references.

We will only disclose Your Personal Information to persons or bodies external to Us where permitted by the Act, including in the following circumstances:

- where You consent to the disclosure; and
- where required by law such as under a subpoena issued by a court.

Although We seek to deal with reputable third parties, We cannot control, and will not be liable for, any use of Your Personal Information by any third party to whom Your Personal Information is sent with Your consent.

We do not disclose any Personal Information to overseas recipients unless You consent to the disclosure or where required by law.

7. Security of Personal Information

We maintain the security of digital records through password protection, firewalls, network security, and restricting and monitoring access to Personal Information. However, no data transmission over the internet or information stored on servers accessible through the internet can be guaranteed to be fully secure. We also maintain security over physical records through storing the records in locked offices and restricting access only to authorised personnel.

8. Retention of Personal Information

We generally retain Personal Information for a period of 7 years from the time Our dealings with You become inactive. Ordinarily, We will destroy the Personal Information held at the end of 7 years or any reasonable time thereafter.

9. Access to Personal Information

You can request Us for Personal Information about You if it is stored by Us. The Personal Information will be provided within a reasonable time after receiving Your request. Requests for Personal Information may be sent to Us using any of the contact details provided in this Policy.

We may refuse to give access to Personal Information under certain circumstances permitted by law, such as where the request for access is frivolous or vexatious, giving access to Personal Information is unlawful, or if We suspect unlawful activity or anticipate legal proceedings with You. If We refuse to provide Personal Information, We will provide written notice to You within a reasonable time and that sets out the reasons for refusal unless it is unreasonable to do so.

10. Quality of Personal Information

We are committed to ensure that the Personal Information collected or used or disclosed is reasonably accurate, up-to-date and complete.

11. You may seek correction

If You become aware that the Personal Information stored by Us is wrong, You have the right to have such Personal Information rectified. This facility is provided free of charge to You. You may rectify the Personal Information by providing any necessary documentation. Such details may be supplied by using any of the contact details provided in this Policy. The Personal Information will be corrected within a reasonable time after receiving all necessary documents.

12. Notification of correction

If We correct Personal Information about You that We previously disclosed to another organisation and if You request Us to notify that other organisation of the correction, We will take reasonable steps to give that notification unless it is impracticable or unlawful for Us to do so.

13. Anonymity

The APPs allow You to deal with Us without the need to identify Yourself or by using a pseudonym. However, considering the nature of Our business, it is impracticable for Us to deal with You if You have not identified Yourself. If We are not able to collect Your Personal Information, We may not be able to provide appropriate services or do business with You or any organisation with which You are connected.

14. Privacy complaints and enquiries

We welcome feedback about privacy issues and will endeavour to attend to all questions and complaints promptly. You can contact Us about any privacy issues. If You are not satisfied with Our response, a complaint can be lodged with the Australian Information Commissioner at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint> or You can call the OAIC enquiries line on 1300 363 992.

15. Definitions

In this Policy:

15.1 “**Act**” means the *Privacy Act 1988* (Cth).

15.2 “**APPs**” means the Australian Privacy Principles as set out in Schedule 2 of the Act.

15.3 “**Company**” means Astute Wealth Advice Pty Ltd ACN 150 511 194

15.4 “**Personal Information**” means information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. Examples include name, address, phone number, email address, credit card number, bank account number, physical traits, hobbies, usage patterns, family members and income.

15.5 “**Policy**” means this privacy policy.

15.6 “**Primary Purposes**” means any or all of:

15.6.1 licensing products, services and materials;

15.6.2 selling and related activities;

15.6.3 providing customer support;

15.6.4 conducting Our day to day business;

15.6.5 developing products, services and materials; and

15.6.6 receiving feedback and dealing with complaints.

15.7 “**Secondary Purposes**” means any or all of:

15.7.1 confidential alternative dispute resolution processes;

15.7.2 the establishment, exercise or defence of a legal or equitable claim;

15.7.3 Our having reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to Our functions or activities has been, is being or may be engaged in; and

15.7.4 Our being authorised by or under an Australian law or a court/tribunal order.

15.8 “**Sensitive Information**” includes information about Your racial or ethnic origin, health, religious beliefs, criminal record, membership of a trade union or membership of a professional or trade association.

15.9 “**We**” and “**Us**” means the Company, and “**Ours**” has a corresponding meaning.

15.10 “**You**” means an individual dealing with Us, and “**Your**” and “**Yourself**” have corresponding meanings.

16. Contact details

Contact person: Michael Topper

Designation: Director

Email: enquiries@astutewheel.com.au

Telephone: 02 94 533 588

Post: PO Box 360, North Sydney NSW 2059 Australia

17. Date this Policy was last amended

19 June 2017