

## Privacy Policy

IC Frith & Associates (WA) abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001.

As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("Personal Information"). Our ability to provide you with personal advice is dependent on us obtaining certain Personal Information about you, including:

- a. information about your employment history, employment circumstances, family commitments and social security eligibility;
- b. details of your financial needs and objectives;
- c. details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation; and
- d. details of your insurer preferences and aversion or tolerance to risk.

Failure to provide to us the Personal Information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

We will not collect any Personal Information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally, collection of your Personal Information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated Personal Information may be collected through one or more of those methods.

We will only collect, maintain and use Personal Information about you if it is necessary for us to provide adequate financial planning advice to you.

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

- a. the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- b. where you have consented to such disclosure; or
- c. as expressed in this Privacy Disclosure Statement; or
- d. 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.

We are required to make certain information available for inspection on request to ensure ongoing compliance with mandatory 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 us, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, product issuers, finance providers and any other person for the purpose of giving effect to your financial plan and the recommendations made by us.

We may disclose your Personal Information to external contractors for the purpose of regular audits to ensure compliance with legislative requirements. It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us.

In the event that we propose to sell our business we may disclose your Personal Information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no Personal Information will be used or, disclosed by them. In the event that a sale of our business is affected, we may transfer your Personal Information to the purchaser of the business. As a client you will be advised of any such transfer.

Your Personal Information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the Personal Information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your Personal Information is treated as confidential and any sensitive information is treated as highly confidential.

In the event you cease to be a client of this organisation, any Personal Information which we hold about you 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.

You may at any time request access to your Personal Information and 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 access to Personal Information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

We will not provide you with access to your Personal Information if:

- a. providing access would pose a serious threat to the life or health of a person;
- b. providing access would have an unreasonable impact on the privacy of others;
- c. the request for access is frivolous or vexatious;
- d. the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- e. providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- f. providing access would be unlawful;
- g. denying access is required or authorised by or under law; and
- h. providing access would be likely to prejudice certain operations by or on behalf of an 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.

We will endeavour to ensure that, at all times, the Personal Information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us and provide to us evidence of the inaccuracy or incompleteness or outdatedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

If we do not agree that your Personal Information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your Personal Information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 20 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

IC Frith & Associates (WA) website contains links to other websites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.