

Privacy Policy

Your privacy is important to us. This Privacy Policy outlines how Priority1 Wealth Management Group (Priority1) manage the personal information we hold about you, our client. Privacy laws apply to how we collect, maintain, use and disclose your personal information. It is Priority1's policy to respect the confidentiality of information and the privacy of individuals. Priority1 is bound by the Privacy Act 1988 including the Australian Privacy Principles. Priority1's Privacy Policy will be reviewed from time to time to take into account new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current Priority1 Wealth Management Group Privacy Policy.

Priority1's Privacy Policy is Based on Openness

We are committed to being open about how we use personal information. Your personal information will be collected and held by Authorised Representatives, Staff and related bodies corporate of Priority1, an Australian Financial Services Licensee.

Why Does Priority1 Collect Personal Information?

Our business is to understand and meet our clients' needs over their lifetime for a wide range of financial and other services. To do this effectively, we need to collect certain personal information. We will only collect personal information as reasonably necessary for this purpose. In most cases, your personal information will be collected when you meet with your adviser, or you provide your information to us via telephone or electronic and written material. In some instances, your information may also need to be collected from third parties such as your accountant, mortgage broker or solicitor.

Our advisers provide financial investment products and services under the Priority1 licence. They include (but are not limited to):

- Life insurance products protecting against risks
- Investment products to build wealth
- Superannuation and retirement income products to provide for retirement
- Banking and deposit products as part of the financial planning advice
- Financial planning advice and other services to help individuals understand their financial needs and make financial and investment decisions

Collecting personal information also allows us to meet legal obligations we might have.

What Kind of Personal Information Do We Hold?

Because of the nature of the products and services provided, government regulations and taxation laws, we ask for a range of personal information from our clients.

The type of personal information we may collect can include name, address, date of birth, contact details, income, expenditure, assets and liabilities, bank account balances, tax and financial statements, social security details, estate planning, insurance, employment details and any other information we consider necessary to be provided by you or by others nominated by you. This may also include sensitive information about you. For more details, see the section 'Sensitive information is subject to greater restrictions'. We obtain most of the information directly from you through applications or other forms, and from maintaining records of information provided in the course of financial planning advice, customer service and for the purpose of conducting business with you. If you choose not to provide the necessary information, we may not be able to provide you with the requested product or service.

How Do We Collect Your Information?

We generally collect your personal information from you. However, we may collect the information with your consent from third parties where it is 'unreasonable or impracticable to collect from you' such as your accountant or a solicitor or your employer or superannuation or investment provider. Where you have provided us with your contact details, personal information or requested our services via our websites, we may keep a record of your information.

How Do We Use This Information and Who May We Disclose It To?

Unless you are informed otherwise, the personal information we hold is primarily used for the provision of financial planning services and reviewing your ongoing needs. We may also use your personal information for secondary purposes such as enhancing customer service and product options, handling your complaints and giving you ongoing educational information, newsletters or opportunities that we believe may be relevant to your financial needs and circumstances.

We also use the personal information we collect about our clients to fulfil our legal obligations.

We will only disclose personal information to third parties for the primary purpose (provision of financial services). We will not release your information for any other purpose unless permitted by the Privacy law and with your consent. You may provide the consent in writing or via telephone.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Other areas within the Priority1 group who provide financial and other services
- Financial planners, brokers and those who are authorised by Priority1 to review clients' needs and circumstances from time to time
- Service providers and specialist advisers to Priority1 who have been contracted to provide Priority1 with administrative, financial, insurance, accounting, legal, information technology, research or other services
- Other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law
- Credit reporting or reference agencies or insurance investigators
- Organisations in connection with the sale or proposed sale of all or part of the Priority1
- AUSTRAC, the government agency who oversees Anti Money Laundering and Counter Terrorism. Before we arrange products or services we are required to validate client identity. We will request and copy some personal documents only for that purpose. Also we are required to provide details of certain transactions and entities where we hold reasonable suspicion of suspect matters.
- External dispute resolution bodies to handle any complaint you may make
- Some of the information (including health information) collected by us may be disclosed to employees or contractors of Priority1 Wealth Management Group outside of Australia. You consent to your information being disclosed to a destination outside Australia for this purpose, including but not limited to Cebu, Philippines. VA Platinum will do all things necessary to ensure that as recipient of personal information, is subject to and complies with its obligations under the Privacy Act and Australian Privacy Principles, which include, Australian Privacy Principle 8 – cross-border disclosure of personal information.

Generally, we require that organisations outside Priority1 who handle or obtain personal information as service providers to Priority1 acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the privacy law.

Sensitive Information is Subject to Greater Restrictions

Some personal information we hold is 'sensitive'. Sensitive information typically relates to a person's racial or ethnic origin, membership of political associations or trade unions, religious affiliations, sexual orientation or practices, criminal record, health information, medical and genetic history.

Sensitive information is usually needed for applications for personal insurance and to manage claims on those products. It may also be relevant to other applications. It is Priority1's policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the

customer agrees otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this and we will only collect sensitive information from you where reasonably necessary for us to provide a service to you and with your consent, or in limited other circumstances specified under privacy laws.

Management of Personal Information

Priority1 trains its employees, financial planners and their staff who handle personal information to respect the confidentiality of customer information and the privacy of individuals. Priority1 regards breaches of your privacy very seriously and will impose appropriate penalties, including dismissal in some cases. Priority1 has appointed a Privacy Officer to ensure that Priority1's management of personal information is in accordance with this Privacy Policy and the Privacy Act.

How Do We Store Personal Information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet, or other electronic medium. We hold personal information in a combination of electronic and paper-based files and take steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

You Have The Right To Check What Personal Information About You Is Held By Us

Under the Privacy Act, you have the right to access any personal information which Priority1 holds about you and to advise Priority1 of any perceived inaccuracy. The Act does set out some exceptions to this. To make a request, you will need to submit your request in writing, verifying your identity and specifying what information you require. We will respond to your request within 14 days. We may charge a fee to cover the cost of verifying the application, locating, retrieving, reviewing and copying of any correspondence requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

Correction of Your Information

Priority1 endeavours to ensure that your personal information is accurate and up-to-date. We realise that this information may change depending on your personal circumstances. You must notify us if there have been changes to your situation. You may ask us to correct your information held by us which you believe is inaccurate or out of date. We will action your request in a timely manner.

What If You Have A Complaint?

If you consider that any action of Priority1 breaches this Privacy Policy or the Australian Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please forward it in writing to:

The Privacy Officer

Priority1 Wealth Management Group

PO Box 375

Croydon VIC 3136

If you are not satisfied with our response to your complaint, you can phone the Privacy Enquiries Line at the Privacy Commissioner's office on 1300 363 992.