



## Privacy Policy

1. Your privacy is important to us. For that reason, please read the Policy carefully and contact us should you have any questions. You can contact us on via our website ([www.oxlade.com.au](http://www.oxlade.com.au)) or on 07 3667 7260.
2. We are committed to protecting the information about you that we collect, store and use when you provide it to us. We manage your information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth). This Privacy Policy describes how we manage any personal information we have collected about you from you.
3. By signing our Client Engagement, you accept this Privacy Policy and consent to the collection, use and disclosure of your personal information in accordance with this Policy.

## Collection and purpose

1. We may collect personal information that you voluntarily submit to us when you become a client or which is provided to us by third parties.
2. The personal information we collect may include:
  - a. Your name, contact details such as your telephone number, physical address and email address and date of birth; and
  - b. Financial information including bank account or credit card details and details of your investments, financial position, circumstances, objectives, insurances, or any other financial matter discussed or involved in our advice.
  - c. Employment information
  - d. Family circumstances
  - e. Health information
  - f. Any other personal information that may be discussed or required by us during the course of providing you with financial advice
3. We collect, hold and use your personal information for a number of purposes, including to assist us in providing financial services to you and for our internal administrative, marketing and planning requirements.

## Disclosure of personal information & client confidentiality

4. We will not disclose contact information about you publicly or to other third parties unless it is authorised or required by law or regulations (or when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on us) or as otherwise outlined in this Policy.
5. If you engage our services, you consent to us:
  - a. Collecting and retaining your tax file number on our files so that we can assist you to complete account opening forms and other forms where your TFN may be required. You are able to request that we no longer hold your TFN.
  - b. Sharing your information with external businesses that support us in providing services to you. This includes product providers, financial planning software providers, outsourced administrative/client service/paraplanning support, and your service providers, such as your accountant, solicitor, tax agent, bank, or any other as



may be relevant. These external businesses may be located in Australia or overseas, such as the Philippines.

- c. Sharing your information with external businesses that support us in the administration and management of the business, including but not limited to accounting, bookkeeping service providers, payment system operators (eg merchants receiving card payments), marketing services, legal services and IT services, or with anyone who our assets or businesses are transferred to. These external businesses may be located in Australia or overseas, such as the Philippines.
  - d. Storing your information on external servers and data storage facilities, some of which may be based outside Australia. This includes the use of Microsoft 365.
6. We are legally required to retain all documents and supporting working papers for seven years after we cease to provide services to you.

#### **Overseas disclosure**

7. In engaging our services, you acknowledge that we may share some of your information with organisations outside of Australia.
8. We may store your data or information in the Cloud or other forms of electronic or networked storage. Due to the worldwide accessibility of such storage through the internet, it's not always possible for us to pinpoint the exact country where your data might be stored, accessed or retrieved. Consequently, there is a possibility that your information could be disclosed in countries beyond the ones mentioned in this policy. If foreign laws require overseas organisations to reveal information that we've shared with them, we are not responsible or accountable for such disclosures.

#### **Marketing material**

9. We may use your personal information to provide you with material, promotions and communications from time to time about services and products we believe are appropriate to you, or from other service providers in partnership with us, or to invite you to continue to use our services. This information will only come from us. We will not on-sell your personal information to other providers without your consent.
10. You may opt out of receiving promotional materials from us at any time by contacting us.

#### **Protecting and maintaining personal information**

11. We will take all reasonable steps to protect the information we hold about you from unauthorised access, use and disclosure, however we cannot guarantee that our systems and stored data will be completely free from third party interception or are free from corruption.
12. Certain parts of our website provides the ability for you to transmit information to our website in an encrypted form by using secure socket layer technology (SSL). However, other parts of our website are not protected by any form of encryption to protect information you send from your computer to us over the Internet. Further, no method of transmission over the internet, or method of electronic storage, is 100% secure. In light of this, we cannot ensure or warrant,



and do not warrant, the security or privacy of your personal information. You transmit this information at your own risk. If you have any questions regarding security you can contact us.

13. If you use our website to link to another site we encourage you to view their terms and conditions of use, privacy policies and security statements before disclosing any of your personal information on those sites.

### **Accessing personal information**

14. It is your responsibility to advise us of any changes to your personal details to ensure we can keep our records accurate and up to date. If you believe that the personal information we hold about you is incorrect, you are entitled to request amendment of such information. You may also request that we delete the personal information that we hold about you. Please note that if we delete your contact information, we may not be able to provide you with financial services.
15. If you request us not to use personal information in a particular manner or at all, we will adopt reasonable measures to observe your request but we may, to the extent permitted by law, still use or disclose your information if you subsequently consent to the disclosure or we believe the use or disclosure is reasonably necessary to assist a law enforcement agency or as otherwise required or authorised by law. If you know the information we hold about you is not accurate or complete, please notify us.

### **Privacy concerns**

16. If you have any concerns about how we handle your personal information or require further information, please contact us. Please also contact us if you no longer consent to receiving marketing material from us.
17. We may change this document from time to time to reflect changes to our information practices. We encourage you to check the Privacy Policy on our website periodically to ensure you are aware of the most current details and practices.
18. Although we intend to observe this policy at all times, it is not legally binding on us in any way.
19. From time to time we may regard it as necessary or desirable to act outside the policy. We may do so, subject only to any statutory rights you have under the Privacy Act or other applicable legislation. We encourage you to regularly review this statement to inform yourself of any amendments.