

Privacy Policy

Suetonius Wealth Management

Introduction

Suetonius Wealth Management is committed to ensuring that the personal information of individuals is handled responsibly and in accordance with the Privacy Act 1988 (Cth) ("**Privacy Act**"), including the Australian Privacy Principles ("**the APPs**") established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

As part of our commitment to ensuring the safety of our clients' private and confidential information and as a mechanism to ensure its compliance with the Privacy Act, we have established and implemented this Privacy Policy ("**the Policy**").

Information Collected

As a financial planning organisation we are subject to certain legislative and regulatory requirements which require us to collect and hold detailed information personally identifying you and/or containing information or an opinion about you. In order to provide you with a comprehensive financial planning and advice service we may collect the following personal information from you:

- name
- e-mail, residential and postal address
- date of birth
- contact details
- occupation and employer
- country of residence
- copy of valid identification documents
- income and expenses
- Tax File Number (TFN)
- personal goals and objectives
- assets and liabilities

In some circumstances we may collect sensitive information about you, such as where you request insurance related products or services. The sensitive information that we may collect includes:

- personal health information from medical practitioners if you are making an insurance claim
- income information from employers in instances where you are applying for additional insurance protection or salary continuance insurance
- details of your dependents or beneficiaries for the purposes of paying benefits in the event of death

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.

Collection and holding of personal information

We are required to collect sufficient information to ensure appropriate advice and recommendations are presented to our clients. Generally we will collect personal information directly from you in a face-to-face meeting. Personal information may also be collected from you via the telephone or email. Where information is required from a third party such as an Accountant, Superannuation fund or financial institution we will obtain authority from you in writing.

What if you do not provide us with the information that we request?

If you elect not to provide us with all of the personal information we require, the adequacy and appropriateness of our advice to you may be effected leaving you exposed to greater risk.

Use of information

We will collect, hold, use and disclose personal information about you as reasonably necessary for our business purposes and as permitted by law. These purposes may include:

- providing products and services, establishing and managing these products as services and other relationships and arrangements
- implementing investment instructions
- processing contributions, transferring monies or paying benefits
- reporting the investment performance of your account
- promoting our other products and services and keeping you up to date on other products and services that we offer
- dealing with complaints
- meeting legal and regulatory requirements. Various Australian laws may expressly require us to collect your personal information or we may need to do so in order to be able to comply with other obligations under those laws. Examples include AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Where the Australian 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 may also be required by other regulators (such as the Privacy Commissioner) to provide records held. Each regulator is empowered under specific legislation to enable enforcement and monitoring to occur; it would be under the relevant legislation that we would need to comply and provide the regulator with records held

Data

To ensure that records are maintained as required, we and our Authorised Representatives may backup electronic records. In addition Product Providers such as Insurance Companies and Financial Institutions may also have similar data protection policies. Please refer to their Australian Privacy Principles Privacy Policy for further details.

We may disclose your personal information to external contractors for the following purposes:

1. Paraplanning (Statement of Advice)
2. Strategy development
3. Compliance monitoring

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 by any of the methods detailed below.

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 effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

Data Quality

Suetonius Wealth Management will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up to date.

Data Security

Your personal information is generally held in your client file 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. All files are stored electronically and where possible paper files shredded in a secure shredder bin. In the event you cease to be a client of this organisation, any personal information which we hold about you will be securely maintained for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

Access to Information Collected

You may at any time, by contacting us request access to your personal information and we may provide you with access to that information. However, there are limited circumstances in which access to an individual's personal information will be allowed.

We will not provide you with access to your personal information if:

1. providing access would pose a serious threat to the life or health of a person;
2. providing access would have an unreasonable impact on the privacy of others;
3. the request for access is frivolous or vexatious;
4. the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
5. providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
6. providing access would be unlawful;

7. denying access is required or authorised by or under law;
8. 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.

If access to information is denied, Suetonius Wealth Management will provide reasons for the denial. All requests for access will be acknowledged within 14 days.

Correction of Information

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. Therefore, you are encouraged to contact us and advise of any change in your personal circumstances that may affect your dealings with Suetonius Wealth Management

Cookies

A "cookie" is a small text file that may be placed on a computer by a web server.

We do not use cookies on our website.

Complaints

Suetonius Wealth Management has in place facilities to properly consider and deal with any enquiries or complaints if you believe the privacy of your personal information has been compromised. Suetonius Wealth Management will respond to all complaints within seven days and aim to have them resolved within 45 days where possible. Where this is not possible, you will be contacted and advised when it is likely that your complaint will be resolved.

You are entitled to obtain access to the information which we hold about you as well as make a complaint by writing to the Privacy Officer at Suetonius Wealth Management, PO Box R808 Royal Exchange NSW 1225

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 Australian Information Commissioner (OAIC). You can contact the OAIC by:

- calling the hotline on 1300 363 992 or
- visiting the web site www.oaic.gov.au

Contacting us about Privacy

If you wish to contact us about the privacy related matters described above or find out more information about our privacy practices, please use the details below:

Privacy Officer
Suetonius Wealth Management
PO Box R808
Royal Exchange NSW 1225
Email: info@suetonius.com.au