

## Privacy Policy

### Privacy at Carnbrea & Co

Carnbrea is the holder of an Australian Financial Services Licence (No. 233763) and specialises in professional financial planning, advice and implementation services.

We respect your privacy and are committed to handling your personal information in an open and transparent way. Accordingly, Carnbrea have developed this Privacy Policy that outlines our approach to handling your personal information and the way Carnbrea collects, holds, verifies, accesses, uses and discloses information about you.

We are bound by, and committed to supporting, the Privacy Act and the Australian Privacy Principles from 12 March 2014 (and the National Privacy Principles up to that date) that guide us in the responsible handling of your personal information.

Key information is set out below. If you need more information or clarification, please ask us.

### Personal information we collect about you

As a professional financial planning organisation our ability to provide you with a comprehensive and appropriate advisory service is dependent on us collecting personal information about you. We collect and hold the following kinds of information about you:

- your name, address and contact details
- your date of birth, age
- your financial needs and objectives (including your retirement plans)
- your employment details and employment history
- details of your current financial circumstances, including your assets and liabilities, income, expenditure, insurance cover and superannuation
- details of your investment preferences and aversion or tolerance to risk
- information about your family commitments and social security eligibility, and
- other details of your personal circumstances that may affect the advice we provide to you and that you consent to supplying and is therefore reasonably necessary for us to provide you with that advice.

We collect most personal information about you, directly from your or (if that is unreasonable or impractical) from a third party you have authorised to provide that information to us. Generally, your personal information will be collected in either meeting with our advisers or via completing a data collection form. We may also collect information from you via the telephone, mail, fax or e-mail. From time to time additional and/or updated personal information may be collected through one or more of these methods.

We hold this information in a combination of electronic formats and in paper form.

We destroy or de-identify personal information about you we collect but that we have not asked you (or a third party) to provide ("unsolicited personal information") if we decide that we could not have collected it even if we had asked for it.

**You may choose not to provide us with your personal information.**

Depending on the nature and quality of the information you choose to withhold, we may not be able to provide you with advice or implement strategies entirely appropriate to your financial needs and objectives.

**How we use your personal information**

Our business is to understand and meet your needs for a wide range of financial advice and dealing services in accordance with our Ongoing Service Agreement or any other client agreement with you. We use your personal information for these purposes and to comply with our regulatory obligations, including (but are not limited to):

- assessment of your risk tolerance, financial needs, objectives and personal circumstances to determine appropriate financial strategies and investment recommendations and otherwise provide you with personal financial advice
- dealing in financial products on your behalf including:
  - investment products and services such as managed investment funds and investor directed portfolio services
  - superannuation products, such as superannuation funds, investments for superannuation funds and investment insurance policies
  - life insurance products, such as insurance for your life, permanent disability and income replacement.

From time to time, we may also use or disclose the personal information collected from you for marketing communications activities reasonably related to the services we provide, such as providing investment articles that may be of interest to you.

We respect your choice to opt out of these activities. Should you decide you do not wish to receive any marketing or promotional material from us at any time, please let us know by writing to the Privacy Officer at 9 Queen St, Melbourne VIC 3000 or call us on (03) 9111 0888. Please allow 2 weeks for your request to be actioned.

**Disclosure of your personal information to outside parties**

Carnbrea may disclose your personal information to other entities, bodies or persons that assist us to administer your investments or provide you with products and services you have asked to receive. These include our internal and external service providers such as platform administrators, legal advisers, accountants, fund managers and product issuers. We will only provide these organisations with the information they need to deliver the relevant product or service.

Carnbrea may also disclose your personal information to other parties when required by law (for example to the Australian Taxation Office) or where necessary to protect our interests.

It is likely that some of the above disclosure of your personal information to outside parties will be to overseas recipients. It is not practicable to identify at this time the countries in which those recipients are likely to be located.

We will also disclose your personal information if you give your consent for us to do so.

Except as set out above, we do not use your personal information for marketing purposes without your specific consent, or sell mailing lists.

**Security of your personal information**

We are committed to protecting your personal information held, either physically or electronically, from misuse, loss, unauthorised access, modification or disclosure. We have taken reasonable steps to secure your personal information.

**Access to your personal information.**

You can access the personal information we hold about you by contacting our Privacy Officer by any of the methods listed below. In normal circumstances we will give you full access to your information within a reasonable period of when the request is made. The time we require to give you access will depend on the type of information requested. However, there may be reasons to deny access, such as when your request may unreasonably impact upon another person's right to privacy. If your access is denied, we will provide you with the reason (unless, in view of the grounds for the refusal it would be unreasonable to do so) and the mechanisms available to complain about the refusal.

Where access is provided, we will require you to provide evidence of your identity and we may charge a fee based on the time spent retrieving, collating and producing the information. This fee will be disclosed to you at the time of your request.

### **Updating or correcting your personal information**

Carnbrea takes all reasonable steps to ensure that all information we hold is as accurate and up to date as possible. If you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete, irrelevant or outdated, you may contact our Privacy Officer by any of the methods listed below and ask for your personal information to be corrected. Unless we disagree with you about the accuracy, relevance, currency or completeness of a record, we will generally make the correction on request, (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on your file so as to ensure those objections are apparent to future users of the information.

### **What to do if you have a question or complaint**

If you require more information about the way Carnbrea manages personal information or wish to make a complaint about a breach of your privacy, you should contact the Privacy Officer by any of the methods listed. Your complaint will be considered and responded to within 21 days.

If you are not satisfied with our response to your complaint, you can email or write to the Office of the Australian Information Commissioner or call the OAIC enquiries line on 1300 363 992 to discuss your concerns.

You can obtain a copy of this Privacy Policy at any time free of charge by calling, emailing or writing to the Privacy Officer. We will send you an electronic or paper copy depending on your needs.

Carnbrea's Privacy Officer may be contacted by:

Telephone: (03) 9111 0888

Email [enquiries@carnbrea.com.au](mailto:enquiries@carnbrea.com.au)

Mail: Carnbrea & Co Limited  
9 Queen Street  
Melbourne  
VIC 3000

### **Will this privacy policy change?**

From time to time, it may be necessary for us to review and revise the policy. We reserve the right to change the policy at any time and may notify you of the change in writing.

This document has been prepared and issued by Carnbrea & Co Limited ABN 33 004 739 655 ('Carnbrea'), Australian Financial Services Licence No 233763.