

# Privacy Policy Statement

## *Our Commitment*

Alliance Investment & Retirement Services Pty Ltd (Alliance) is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Amendment (Private Sector) Act, 2000 sets out a number of National Privacy Principles (NPPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

Alliance believes that this Privacy Policy discloses how the personal information you provide to us and our representatives is collected, used, held, disclosed and disseminated.

Alliance is required to meet particular legislative and regulatory requirements. In order to provide comprehensive financial planning advice to you, we are required to collect certain personal information from you.

We encourage you to check our website regularly for any updates to our Privacy Policy.

## *Your Personal Information*

As a financial planning organisation we are subject to certain legislative and regulatory requirements (including s945A of the Corporations Act) which necessitate us to obtain personal information about you. Detailed below is some of the information we are expected to collect from you:

- your name, date of birth, tax file number, current addresses, telephone/mobile/fax numbers, e-mail address;
- information regarding your dependants and family commitments;
- your occupation, employment history details, family commitments, social security eligibility, health information or other information we may consider necessary;
- your financial needs and objectives;
- your assets and liabilities (current and future), income and expenses;
- your superannuation and insurance details;
- your social security entitlements; and
- your risk profile details.

## *How We Collect Personal Information*

Alliance collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- directly from you, when you provide information through a data collection form;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet;
- directly from your accountant and lawyer if authorised by you; and
- directly from fund managers, superannuation funds, life insurance companies, other product issuers and government agencies once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party.

### ***How We Use Your Personal Information***

The information in this document details how we comply with the Privacy Act including:

- What is the purpose?
- Who is my information disclosed to?
- What law requires collection?
- What are the consequences?

Primarily, your personal information is used in order to provide comprehensive and/or specific financial planning services to you.

From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain our database for those individuals not wanting direct marketing material.

If you provide inaccurate or incomplete information we may not be able to provide you with the advice or services you are seeking.

### ***When We Disclose Your Personal Information***

In line with modern business practices common to many financial institutions and to meet your specific needs we may disclose your personal information to the organisations described below.

As our Authorised Representatives are members of the Financial Planning Association of Australia (FPA), we are required to meet a level of professional standards. From time to time, we may need to provide the FPA with access to your personal information to ensure that we are meeting our compliance requirements.

The Corporations Act has provided the Australian Securities and Investments Commission (ASIC) with the authority to inspect certain personal information that is kept on our files about you.

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

For the purposes set out above, we may disclose your personal information to organisations outside Alliance. The organisations to which we disclose information may include:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service;
- compliance consultants to ensure that our representatives are meeting our compliance standards;
- mailing houses;
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers to maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems;
- government and regulatory authorities and other organisations, as required or authorised by law, for example, to government or regulatory bodies for the purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue;
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business;
- where you have given your consent including your legal advisers;
- a new owner of our business that will require the transfer of your personal information.

Our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Alliance.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. 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 the business or a portion of the business is sold, the purchaser will be provided with access to your information to ensure the purchaser can appropriately advise you and service your ongoing requirements. This information will be provided on the condition that it will only be used for the purposes intended.

### ***How We Store and Secure Your Personal Information***

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours.

Your personal information is also held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely offsite. Other measures taken are:

- Confidentiality requirements for our employees.
- Security measures for systems access eg firewall.
- Providing a discreet environment for confidential discussions.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

It is a legislative requirement that we keep all records for a period of at least 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

### ***Access & Correction***

You may at any time request access to your personal information and we will 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 endeavour to respond to any request for access within 14 – 30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Note that we need not provide access to personal information in some situations, for example where a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonably interfere with another person's privacy, or be a breach of the law. If we refuse access we will advise you of our reasons for doing so.

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 by any of the methods detailed below and provide to us evidence of the inaccuracy, incompleteness or outdatedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

### ***How to provide instructions to us***

You may instruct Alliance by telephone, email, fax, in person or in writing.

### ***Using Government Identifiers***

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number, driver's licence or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

### ***Complaints Resolutions***

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

### ***Our Website***

Alliance's website provides links to third party websites. The use of your information by these third party sites is not within the control of Alliance and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy stands, policies and procedures.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Our Website uses cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

### ***Spam Act***

Spam is a generic term used to describe electronic 'junk mail' - unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

Alliance complies with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, Alliance makes sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

### ***Internal Procedure for dealing with complaints***

The three key steps Alliance Investment & Retirement Services follows:

- Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about the person and that Alliance that is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

***Consented to such communications***

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is okay to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

***Comply with the law regarding viral messages***

Alliance ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have Consented to receiving Commercial Communications.

***Comply with the age sensitive content of commercial communication***

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, Alliance takes reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event

**Contact Details**

Privacy Officer:	Linda McDonough
Address:	Suite 11, Level 1, 22 Railway Road SUBIACO WA 6008
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