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WA Aged Care Financial Solutions
ABN 88 132 254 061*

PRIVACY POLICY

When you trust us with your personal information, you expect us to protect it and keep it safe

We are bound by the *Privacy Act 1988 (Cth)* ('Privacy Act') and will protect your personal information in accordance with the *Australian Privacy Principles*. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

About this policy

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

What kinds of personal information do we collect and hold?

When you apply for financial products or services you may be asked for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to, and if you choose to supply it. If you apply for insurance we may collect information about who is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act.

Generally, we only collect information necessary to provide you with a specific product or service and you consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide a client with financial products and services. This may include:

- checking whether you are eligible for a recommended financial product or service;
- assisting you complete an application for a financial product or service;
- providing you with a financial product or service; and
- helping you manage a financial product or service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, to prevent fraud, crime or other activity that may cause harm. We may also use your information to tell you about financial products or services we think may interest you.

How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a financial product or service, or talk to us in person or by phone.

We also collect information from you electronically, such as when you send us electronic correspondence (see “Do we collect personal information electronically?”).

We may also collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, and with your approval, we may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)*;
- your Tax File Number, if you choose to provide it, under the *Income Tax Assessment Act 1936* (Cth); and
- certain information in relation to your application if you have applied for an insurance policy under the *Insurance Contracts Act 1984* (Cth).

How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia or held with external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are required to keep information secure; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Who do we disclose your personal information to, and why?

We may provide personal information about our clients to other organisations. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform. Generally, we disclose personal information to organisations that help us with our business. They may include:

- our agents, contractors and external service providers (for example, technology service providers);
- paraplanning service providers;
- insurers, re-insurers and health care providers;
- payment systems operations (for example, merchants receiving card payments);
- organisations that provide financial products or services to you;
- financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;
- debt collectors;
- our legal advisers or auditors;

- your representatives (including your legal adviser, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- IT Service Providers;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others where;

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

Do we disclose personal information overseas?

We may disclose your personal information to a recipient which is located outside Australia. This may include:

- cloud based service providers; or
- any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

Do we use or disclose personal information for marketing?

We may use your personal information to offer you financial products and services we believe may interest you, but we will not do so if you tell us not to. We may offer you products and services by various means, including by mail, telephone, email, or other electronic means, such as through social media or targeted advertising through our websites.

We may also disclose your personal information to companies who assist us to market financial products and services to you.

If you don't want to receive marketing offers from us please contact us.

Access to and correction of personal information

You can request access to the personal information we hold about you and you can ask for corrections to be made.

There is no fee for requesting that your personal information is correct or for us to make corrections.

There are some circumstances in which we are not required to give you access to your personal information.

If we refuse to give you access to, or to correct your personal information, we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

Resolving your privacy concerns and complaints – your rights

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us or the *Australian Privacy Principles*, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving providers of financial services.

AFCA can be contacted at:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001
Phone: 1800 931 678
Email info@afca.org.au
www.afca.org.au

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
www.oaic.gov.au

Contact us

You can contact us by:

- calling 08 6272 0888
- emailing info@wealthform.com
- visiting www.wealthform.com
- writing to us at PO Box 2030, Churchlands, WA 6018

Changes to the Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on www.wealthform.com or by calling us on 08 6272 0888.

Meaning of words

We, us or **our** means:

Wealthform Pty Ltd ABN 88 132 254 061, trading as Wealthform Financial Services, and WA Aged Care Financial Solutions; and Moray Pty Ltd ABN 24 608 041 774 AFSL 480196.

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