

## Privacy Policy

### The privacy of your personal information is important to us.

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 David Murray, CEO SGN Financial Pty Ltd – PO Box 9222, Brighton VIC 3186, Tel 0409 717 707.

### Your representative will ask you many questions. Why is so much information required?

We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. Under the following Australian laws, we may be authorised or required to collect your personal information:

- Corporations Act 2001,
- Australian Securities and Investment Commissions Act 2001,
- Anti-Money Laundering and Counter Terrorism Financing Act,
- Taxation Administration Act 1953, as those acts are amended and any associated regulations.
- From time to time other acts may require or authorise us to collect your personal information.

We are required to collect sufficient information to identify a person's needs, objectives and financial circumstances so that we can provide appropriate financial advice. This is likely to include things like your name, address, contact details and date of birth. It may also include goals and objectives, financial and health details where required to provide say insurance advice.

We will gather and record information by asking you numerous questions about you and possibly your family. We may also keep other financial information such as transaction histories and account balances. We endeavour to retain accurate, complete and up to date personal information so we will ask you to review your personal information from time to time. If the information you provide to us is incomplete or inaccurate this will impact on our analysis of your requirements and may result in advice that is not appropriate to your needs and circumstances. If this does occur, you will need to make your own assessment concerning the appropriateness of our advice.

At times, we may collect personal information from someone other than yourself, and you may not be aware that we collect or have collected this information.

### Access and correction

You may (subject to permitted exceptions) access and update your information by contacting us. You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law. We will give you reasons if we deny access though will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the

personal information is dependent to a large degree on the information you provide, and you should advise us if there are any errors in your personal information.

## Providing personal information

We may provide personal information to:

- organisations (who are bound by strict confidentiality) to whom we outsource certain functions, such as our auditors (in these circumstances, information will only be used for our purposes);
- other professionals, such as solicitors, accountants and stockbrokers when a referral is required;
- entities based overseas (see below for details);
- third parties when required to do so by law, e.g. legislation or Court Order.

## Overseas disclosure

Sometimes we need to provide personal information to or get personal information about you from persons located overseas. For example, we may outsource a function involved in the financial planning business to someone based overseas. Nevertheless, we will always disclose and collect your personal information in accordance with the Privacy Principles.

## Identifiers

Although in certain circumstances we are required to collect government identifiers such as tax file numbers, Medicare number 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.

## 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 and owned by either the SGN Financial Pty Ltd or 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 bound by internal information security policies and are required to keep information secure;
- 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.

## Dealing with us anonymously or using a pseudonym

The nature of the provision of financial services does not lend itself to treating customers with anonymity. All transactions require personal information about the individual for whom the transaction is being completed. In some instances, we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client. You can deal with us anonymously where it is lawful and practicable to do so.

## Marketing practices

Every now and then we might let you know about news, products and services that you might be interested in, via mail, email, SMS, telephone or online. We will engage in marketing unless you tell us otherwise. You can contact us at any time to update your marketing preferences.



## Sensitive information

We will not collect sensitive information about you, for example where information is provided by you for insurance or risk purposes, without your consent. Exceptions to this include where the information is required by law or for the establishment, exercise or defence of a legal claim.

## Privacy complaints

If you believe your privacy has been breached or you have a privacy complaint you should write to SGN Financial Pty Ltd by emailing [enquiries@sgnf.com.au](mailto:enquiries@sgnf.com.au), or contact David Murray, CEO SGN Financial Pty Ltd – PO Box 9222, Brighton VIC 3186, Tel 0409 717 707.

If SGN Financial Pty Ltd does not satisfactorily address your complaint you can escalate it to The Australian Financial Complaints Authority (AFCA).

**Writing to:** Australian Financial Complaints Authority

GPO Box 3

Melbourne VIC 3001

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Phone:** 1800 931 678

Or The Office of the Australian Information Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au)

**Disclaimer:** Unless otherwise expressly stated to the contrary this information is not designed for the purpose of providing personal financial or investment advice. Information provided is of a general nature only and does not take into account your particular investment objectives, financial situation or investment needs.

