

Introduction

At Fluid Financial Planning we are committed to ensuring your privacy and the integrity of the personal information you provide to us. We believe that respecting your privacy is fundamental in maintaining the ongoing relationship we have with you. Under the Privacy Act, we are bound by the National Privacy Principles, and in this Privacy Policy we clearly outline how we intend to meet our privacy obligations.

Personal information

The Privacy Act sets out the information that it protects. Personal information refers to information or an opinion about a person, where the person's identity can be derived from the information or opinion.

Personal information collected

Fluid Financial Planning will collect information that is relevant to, and necessary for, the financial services provided to you. The information we will likely collect includes your name, address and contact details, your occupation, employer, tax file number, date of birth, and details about your financial circumstances, goals and strategies.

Consequences of not providing your personal information

You are not obliged to give us your personal information. However, should you decide to not disclose such information we may not be able to provide you with the services you have engaged us to provide.

How your personal information is collected

Usually we will only collect your personal information directly from you, via one-on-one interviews with you, via the internet, via our website or by the completion of data collection forms (including completing these forms in soft copy and on the internet).

It may be necessary for us to collect personal information from third parties, such as the issuers or operators of financial products or financial services.

Collection of sensitive information

In the event that we are required to collect sensitive information we will only do so with your prior consent (subject to some exceptions, for example where collection is required by law and or when the information is necessary for the establishment, exercise or defence of a legal claim).



In all instances, we will endeavor to first collect such information directly from you wherever possible.

Sensitive information is information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

When your personal information is collected we will fully disclose the reason why it is being collected, the organisations, or the types of organisations, to whom we usually disclose such information, any law that requires the information to be collected, and the primary consequences to you if the information (or part of the information) is not provided. We will also provide you with our contact details and explain to you how you can access your information.

We are also required by law to request certain information. For example, when you acquire a new product or service from us we will need to obtain certain document evidence such as a certified copy of your driver's licence, passport or birth certificate, to confirm your identity.

How your personal information is used

Your personal information is collected so that we can provide you with the financial services you have requested. This is known as the 'primary purpose' for collection of personal information

We will also use or disclose information where such use or disclosure is required by law or is necessary in relation to dealing with unlawful activity or threats to life, health or safety.

Some of the circumstances described above will require disclosure of your personal information to third parties.

We may provide your personal information to the following types of service providers:

- other advisers (including Authorised Representatives), paraplanners and organisations who work with us to provide the financial services you have requested;
- insurance providers, superannuation trustees, investment managers, banks and financial institutions and any product providers related to the financial services you have requested (and the associated services providers they use);
- organisations or individuals that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, doctor, medical professional, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business;
- relevant public, government or regulatory authorities, our legal representatives or other concerned parties,
- in special situations where we have reason to believe that disclosing your personal information is necessary to help identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users or anyone else who could be harmed by such activities; and
- where we are otherwise authorised or required by law to do so.

You need to refer to any external third parties own privacy policy to see their approach to handling your privacy. Fluid Financial Planning tries to ensure third parties abide by the same privacy rules where



possible, but, you acknowledge, that we are not responsible for the way these organisations collect, use, disclose or handle personal information you provide to them.

Marketing our products and services

We may use or disclose your personal information to let you know about, and develop, products and services from across the Group that might better serve your financial, e-commerce and lifestyle needs, newsletters, or promotions or other opportunities in which you may be interested. For example, we may do this after an initial marketing contact.

We may share your information with our service providers and other third parties so that they can provide you with products or services on our behalf or help us to provide you with the requested products or services including contacting you in relation to the products or services.

You can contact us at any time if you no longer wish us to send you marketing material, see our contact details on our website as follows www.fluidfinancialplanning.com.au/contact, call us on (02) 9922 4448 or email your adviser directly.

Data quality and protection

Fluid Financial Planning will take reasonable steps to ensure all personal information collected, used or disclosed is accurate, complete and up-to-date at all times. We will take reasonable steps to make sure this is the case. This way we can provide you with better service

Reasonable steps are taken to protect your personal information from misuse and loss, and from unauthorised access, modification and dissemination.

We store information in different ways, including in paper and electronic form.

We have tried where possible to encrypt the soft data that we store to further protect your information.

Once your personal information is no longer required by us, reasonable steps will be taken to destroy such personal information. However, please note that we are required to maintain personal information for a minimum period of 7 years as part of our record keeping obligations.

Data access and correction

If you believe your personal information to be inaccurate, incomplete or out-of-date, you should contact Fluid Financial Planning immediately and all reasonable steps will be taken to correct the information. Should there be any relevant change to your personal circumstances, please advise Fluid Financial Planning as soon as possible.

If you require access to your personal information please contact your financial advisor in writing.

Access to your personal information will generally be granted, unless certain exceptions apply. Your request should specify the information to which you require access. A record of your request for access will be kept, noting the outcome and the manner in which it was dealt with.

Factors affecting a right to access include:

- access would pose a serious threat to the life or health of any individual
- The case of spousal separation
- access would have an unreasonable impact on the privacy of others



- a frivolous or vexatious request
- the information relates to a commercially sensitive decision making process
- access would be unlawful
- access would prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security function or negotiations with you
- legal dispute resolution proceedings
- where a third party has given us health information about you in confidence
- denying access is required or authorised by or under law

We will give you reasons if we deny access.

If we are unable to satisfy your request for access or correction we will provide our reasons to you in writing.

We do not charge for requesting access to your personal information. We may, however, pass on any costs associated with meeting your request, such as photocopying and postage costs. All requests will be responded to within five business days of receipt of your request.

Disclosure and storage of personal information outside Australia

Personal information submitted by Fluid Financial Planning's customers and visitors to our website may be held on servers located in Australia or on the servers of computer software service providers and product providers with data centres in Australia, the United States of America, Europe and Asia.

We may transfer data outside of Australia to our service providers in order to obtain secure storage, back-up and data retrieval services. Secure storage means the information is encrypted when stored by our service providers and or is encrypted by Fluid Financial Planning before being stored and again encrypted by our service provider.

Our main computer service providers have data centres located in the United State, Singapore, Ireland, and Hong Kong. These are the main countries that your information may be disclosed to by Fluid Financial Planning but there also may be other countries from time to time.

Other third party service and product providers that we recommend to you (such as but not limited to fund managers, banks, insurance companies, accountants, solicitors and other financial institutions) may store your information overseas and you should refer to their privacy policies for further information. Be sure to check their Privacy Policy as we are not responsible for privacy policies or practices of these other third parties.

When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia except in rare cases (for example, where we are required by law to disclose your information overseas).

When you provide us with your personal information you give us your consent to store your personal information outside of Australia for the purposes described above.



Changes to our Privacy Policy

This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will publish any changes on our website. This Privacy Policy was last updated in March 2013.

Anonymity

You may contact us anonymously; however, such anonymity will hinder identification and will subsequently limit the services we can provide you.

Keeping us informed about your personal information

It is very important that we have the most current information about you. Without current information we may not be able to make appropriate recommendations or make adjustments to the products services and goals we have set in place for you.

As a result we ask that you update us about any changes in your personal information even if you think it is very small or irrelevant. We always welcome contact from our clients

To update your personal information please contact your financial adviser.

Complaints and further information

If you would like further information about how Fluid Financial Planning handles your personal information, or to make a complaint in relation to privacy, please contact us in writing at the following address:

Complaints Resolution Manager
Fluid Financial Planning Pty Ltd
Level 1, 5 Ridge Street
North Sydney NSW 2060

If we are unable to resolve your issue you may lodge a complaint with the Privacy Commissioner. You can contact the Privacy Commissioner by telephoning 1300 363 992 or by visiting the website www.privacy.gov.au

What about privacy and the internet?

This statement outlines some privacy issues specific to the fluidfinancialplanning.com.au website.

The Fluid Financial Planning website provides you some interactive tools designed to help you make an informed choice with certain financial and other decisions. Some of these tools include budget planners, debt reduction calculators, home loan comparison, key factsheets and superannuation calculators.

Fluid Financial Planning may collect personal information you enter when using the interactive tools on our website and or when you visit our website. Where these tools are provided by third party websites you should note they may also collect personal information and we recommend that you read their privacy policy when using these tools.



What is a Cookie and how do we use cookies?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on the Fluid Financial Planning website, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. Fluid Financial Planning may also use external service providers to track the traffic and usage on the website.

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Links to third party websites

The Fluid Financial Planning website may have links to external third party websites that may benefit the user.

External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to Fluid Financial Planning's privacy standards and procedures.

Website Analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from the Fluid Financial Planning website, anonymously surveying users of the sites.

The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites. You cannot be identified personally from this information and no personal information is stored about you.