



Prosperity Wealth
Design | Protect | Empower | Nurture | Grow Management



PRIVACY POLICY 2022

Privacy Policy 2022

This Policy

This privacy policy outlines how Prosperity Wealth Management Pty Ltd, as trustee for the Hayward Family Trust, Trading as Prosperity Wealth Management ('we', 'us' or 'our') manage your personal information.

It also sets out generally what personal information we hold, for what purposes and how we collect, hold, use and disclose it.

The privacy of your personal information is important to us. We are required to comply with the Australian Privacy Principles, and we will comply with the Australian Privacy Principles as well as other applicable laws affecting your personal information.

Collecting Your Personal Information

Your personal information will be collected and held by us, as an authorised representative of Millennium3, an Australian Financial Services Licensee (**Licensee**), for:

- Providing you with the advisory services that you have requested;
- Managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- Completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- Protect our business and other clients from fraudulent or unlawful activity;
- To comply with relevant laws, regulations, and other legal obligations;
- To help us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested; and
- For any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers. You can email us at client.services@prosperitywealth.com.au or call us on our toll-free number, **1300 667 775**. If you receive an email from us, just click on the "*Unsubscribe*" hyperlink at the bottom of our emails, and we will process your request as soon as practicable.

Information We Collect

To enable your financial adviser to provide you with the financial advice you request that is suitable for your investment objectives, financial situation and particular needs, we need to obtain and hold personal information about you. This includes:

- Your name, contact details and date of birth;
- Employment details and history;
- Financial details, including information about your financial needs & objectives, your current financial circumstances, including your assets & liabilities, income, expenditure, insurance cover & superannuation details;
- Details of your investment preferences and risk tolerance;
- Family circumstances & social security eligibility; and
- Any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

If it is reasonable and practicable, we will only collect your personal data from you. Generally, your personal data will be collected when you meet with your adviser in person or provide your adviser with information over the telephone, or online, such as with our Wealth Central Client Portal, or with written material. We may need to collect personal information from third parties, such as your accountant or others we believe you have authorised to provide information to us.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

How Your Personal Information is Held

Your personal data is generally held in client files or a computer database. Your personal data may also be held in a secure archiving facility or cloud-based storage facility.

We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems such as 2 Factor Authentication and 128KB Encryption.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to providing the financial advice you requested. The types of service providers and other third parties that may be provided with your personal information are:

- Our Licensee, who provides us with our financial planning software and compliance support services;
- Other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service), such as fund managers who assist us in providing financial advice and paraplanners;
- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- A superannuation trustee or other product provider whom you have authorised to deduct advice-related costs from your superannuation or investment fund who has requested a copy of your Statement of Advice to satisfy their legal obligations;
- Organisations that assist in operating a financial planning business, such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- Your representatives or service providers, such as your accountant, solicitor, tax agent, stockbroker or bank;
- Organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures before any such sale or transfer;
- Government authorities and other organisations when required by law; and
- Organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- The primary purpose for which it was collected or a related secondary purpose;
- Where you have consented to the use or disclosure; or
- In other circumstances where Australian Privacy Principles authorise the use or disclosure, such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us. In this case, we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

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Organisations outside Australia

To provide you with our services, we may need to share your information with organisations outside Australia (for example, Information Technology providers, Paraplanning or virtual Administration providers) – these countries include:

India & Vietnam

We may also store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. Overseas organisations may be required to disclose the information we share under foreign law.

We will not send personal data to recipients outside of Australia unless:

- We have taken reasonable steps to ensure that the recipient does not breach the Privacy Act & Australian Privacy Principles;
- The recipient is subject to an information privacy scheme similar to the Privacy Act; or
- The individual has consented to the disclosure.

Accessing your Personal Information

You can gain access to the personal information that we hold. This is subject to exceptions allowed by law, such as where providing you with access would have an unreasonable impact on the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access, don't hesitate to contact us (see "Contacting Us and Privacy Issues" below).

Correcting Your Personal Information

We take reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date don't hesitate to contact us (see "Contacting Us and Privacy Issues" below) and let us know what information is incorrect.

If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information, we will provide you with the reasons for not doing so.

Contacting Us Regarding Privacy Issues

You can obtain further information on how we manage the personal information we hold, or you can raise any privacy issues with us, including a privacy complaint, by contacting us using the details below.

Les Hayward
Director & Principal Adviser, Prosperity Wealth Management Pty Ltd
Ph: 08 65557900 Email: les@prosperitywealth.com.au

We are committed to working with you to resolve a complaint involving your personal information. However, if you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

Office of the Australian Information Commissioner

www.oaic.gov.au/privacy
Phone: 1300 363 992
Email: enquiries@oaic.gov.au, or

Australian Financial Complaints Authority (AFCA)

Website: www.afca.org.au
Email: info@afca.org.au
Telephone: 1800 931 678 (free call)
In writing to: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution free to consumers. Time limits may apply to complaints lodged with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.