

SGN FINANCIAL PRIVACY POLICY

At SGN Financial Pty Ltd ('SGN'), we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

SGN requires each Corporate Authorised Representative (CAR) to either adopt SGN's privacy policy as their own or have their own in place that meets privacy requirements. At all times, each CAR is responsible for ensuring they effectively manage, comply with, and meet privacy requirements.

What personal information do we collect and hold?

When you engage with us about our products or services we provide or the products and services we arrange with other providers (e.g. financial product issuers, insurers) and/or apply for any of these products or services, we may ask for personal information. We collect your information through client fact finds, application forms, website enquiry forms and when we speak to you by telephone. This can include a broad range of information but not limited to your name, age, gender, address and contact details, to information about your personal affairs. We may also collect your tax file number if we are authorised to do so and if you decide to provide it to us. If you apply for personal insurance, we may collect information about what is being insured, the beneficiaries and your health and financial situation, depending on the type of insurance.

The majority of time we will collect personal information directly from you, however we may also collect personal information about you from third parties. Where we collect personal information from third parties, it will generally be done with your consent through the completion of a Third-Party Authority form, however from time to time we may collect your information without your direct involvement. For example, if relevant we may collect personal information about you from:

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

The collection of sensitive information is restricted by the Privacy Act. However, in some cases it may be necessary for us to collect sensitive information to provide you a specific product or service and you have 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.

Consumer Data Rights ('CDR') and Privacy

Under the CDR regime, banks, energy companies and telecommunications companies, among others, are 'data holders'. These data holders may, on request, share consumer data (such as detailed financial transactions, spending habits) with accredited data recipients (e.g. fintech companies and comparison services). Financial advisers are not 'accredited data recipients' under the regime. However, they are 'trusted advisers'. This means a consumer may consent to an accredited data recipient sharing their CDR data with the adviser.

While financial advisers themselves, as trusted advisers, are not required to obtain consumer consent or provide any

particular disclosures under the CDR regime, it is important to recognise that existing obligations under the Privacy Act relating to the collection, use and disclosure of personal information still apply, as well as other regulatory obligations.

As some CDR data can be highly sensitive and could be detrimental to clients if it were to fall into the wrong hands or be used for other purposes, SGN requires its practices and advisers to use particular care around the collection, storage, use and disclosure of such data. As a licensee, we recommend that practices regularly monitor, supervise and review the use of CDR data.

How do we use your information?

We use your personal information to help us make recommendations about your financial affairs, report to you on your investments, invoice you for our services and keep you informed about our products and services and to satisfy certain legislative and regulatory requirements.

We will only disclose or use your personal information for the purposes for which it was disclosed to us, or related purposes which would reasonably be expected without your permission, or to comply with legal or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business.

We also use your personal information to manage your ongoing requirements and our relationship with you, e.g. ongoing service arrangements. This includes contacting you by mail, telephone or electronically (unless you tell us you do not wish to receive electronic communications).

From time to time we will use your contact details to send you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. We may also send you regular updates by email or by post. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

What if you don't provide information to us?

If you do not provide us with some or all the information that we ask for, we may not be able to effectively provide personalised financial advice to you or provide financial products.

You can contact us without using your name or by using a pseudonym. However, we may need your name or contact details to respond to you. 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.

Web and mobile data

Personal data - We do not collect personal data or information via our website or mobile technology or third party tools.

Other data - We may use technology such as cookies, beacons, tags, scripts and tracking pixels to collect, store and use anonymous data about how you use our website / mobile technology. This includes your server address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data is used to increase functionality and can also enable us to display information and content that is tailored to our understanding of your interests. This information alone cannot be used to discover your identity.

How do we store and protect your personal information?

We strive to maintain the relevance, accuracy and completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for

the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.

When your file is archived, it is sent to an external data storage provider for a period of time. We only use storage providers in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by employing a number of controls such as password-restricted access, two-factor authentication for critical applications, anti-malware and anti-virus software, using up to date software and implementing security patches. We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

Will we disclose your personal information to anyone?

We do not sell, trade, or rent your personal information to others. We may disclose your information to organisations outside SGN. 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.

We may also need to provide your information to contractors who provide services to us, such as:

- financial services organisations (i.e. banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers);
- paraplanning service providers;
- insurers and health care providers;
- payment systems operators (i.e. merchants receiving card payments); other organisations, who jointly with us, provide products or services to you;
- debt collectors;
- our legal advisers or auditors;
- our agents, contractors and external service providers (i.e. technology service providers and mailing houses);
- 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.

We will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may provide your information to others if we are required to do so by law or under some other unusual circumstances which the Privacy Act permits.

How can you check, update or change the information we are holding?

You may ask us for access to your personal information and to correct it at any time.

Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or complying with a correction request.

To access or correct your personal information, please write to your adviser and/or Privacy Officer.

We may charge you for our reasonable expenses incurred in providing you with access to your information such as photocopying, delivery or accessing costs of information stored off site and postage.

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

What happens if you want to complain?

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer at:

Email: enquiries@sgnf.com.au

Writing to: David Murray, CEO
SGN Financial Pty Ltd
PO Box 9222
Brighton VIC 3186

Phone: 0409 717 707

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

If we do 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

Phone: 1800 931 678

Website: www.afca.org.au

Or The Office of the Australian Information Commissioner at www.oaic.gov.au

Your consent

By asking us to assist with your financial planning and related needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

Updating this policy

This Privacy Policy was prepared on 24th April 2023. We may update it at any time. The current new version will be published on our website.