



SFG Australia Limited and Subsidiaries

ABN 81 006 490 259

Privacy Policy

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1. SFG Privacy Policy

Your personal information (such as information that identifies you or can be used to identify you, including your name, date of birth and contact details) is protected by the Australian Privacy Act 1988 (Cth) (the Privacy Act).

This policy applies to the operations of SFG Australia Limited and its subsidiaries (**SFG**, **'we'**, **'us'**, **'our'**, the **'Company'** and the **'SFG Group'** of companies). This policy explains how we will use and manage your personal information. It also describes in general terms, how personal information is collected, the sorts of personal information held as well as the purposes for which it may be used and disclosed.

SFG will review and update this policy from time to time to make sure it remains appropriate should there be a material change to our business operations or law. We reserve the right to notify you by posting an updated version of the policy on our website. We will be governed by the most current SFG Privacy Policy regardless of whether or not we have given you specific notice of any change.

2. Your personal information is important to us

We are committed to being open and transparent in how we use and manage your personal information. We will comply with any laws introduced to strengthen protection for consumers' privacy. Where our documents ask for personal information, we will normally state the general purpose for its use and to whom it may be disclosed.

We respect your right to maintain your privacy, and we aim to let you choose how your personal information is collected and used. We know that providing personal information is an act of trust and we take that seriously. Unless you directly give us consent to do otherwise, we will only collect and use your personal information as set out in this policy.

3. The purposes for which we collect personal information

We collect personal information to provide you with appropriate products and services and to understand your needs. Unless we tell you otherwise, the personal information we hold is used mainly to facilitate the provision of services to you and to review your needs over time.

The reasons we may use your personal information include:

- to administer your account and provide services to you;
- to facilitate the provision of services to you;
- when we believe it necessary to provide you with a service which you have requested, such as a service partner managing your account;
- to review your product needs over time;
- to comply with the rules of any relevant service;
- to survey your opinions on products or services;
- to send you advertisements about products and services which we think you are likely to be interested in. You can contact us at any time if you no longer wish us to receive advertisements (see the Contact us section below);
- to provide you with a better website experience with content and advertising that is more relevant to your interests;
- to carry out, monitor and analyse our business, products or services;
- as part of the sale, merger or similar change to our business;
- to comply with any laws, rules or regulations;
- to prevent fraud or protect the rights, property or personal safety of another SFG client, a member of the public or SFG;
- in dealing with complaints; and
- to enforce our legal rights, including claim recovery activities and legal proceedings.

4. The kinds of personal information that we collect

SFG will not collect personal information about you without your consent. The only personal information we collect is what you tell us about yourself.

The type of information we collect will depend on the service or products you request, and may include (but is not limited to) your name, address, date of birth, contact details, gender, income, asset and liability details, tax and financial statements, employment details, financial position and your nationality. We may need to collect details including the length of time at your current address, number and ages of dependents, proof of earnings, medical and lifestyle information (e.g. for credit or insurance products).

We may also collect government identifier numbers such as Tax File Numbers (TFN) Australian Business Numbers (ABN) or Australian Company Numbers (ACN); Medicare numbers, passport citizenship or birth certificate numbers in administering the product or service or to verify your identity.

If you do not provide all or some personal information, we may not be able to provide you with the product or service you request.

5. How we collect personal information

We normally collect personal information directly from you through application forms, over the telephone, from our website, or in person. Where it is impractical or unreasonable to collect personal information directly from you, we will collect personal information from a third party (e.g. your partner or a family member, a financial adviser, lawyer, accountant, medical practitioner, government agency, public directories or public register). We collect information from third parties to provide you with a product or service or to assist us to locate or communicate with you.

6. Dealing with personal information

We may also disclose your personal information to related parties in the SFG group of companies and third parties as necessary to assist us in providing products and services to you or otherwise in going about our business. We may disclose your personal information to:

- providers of outsourced services such as unit registry providers, custodians, back office administrative service providers, printers, telemarketers and mail houses;
- financial institutions and their associated companies or service providers involved in processing transactions;
- providers of research and data analysis services, to support our systems, investment strategies and services;
- other organisations as part of the sale, merger or similar change to our business;
- representatives or agents acting on your behalf such as financial advisers or an advisory group (unless you otherwise notify us in writing, we will provide your investment details to your financial adviser or your advisory group), lawyers, accountants settlement agents, executors and administrators, trustees, guardians or attorneys;
- insurers, brokers and superannuation providers;
- our appointed auditors, accountants, investigators, medical practitioners and lawyers;
- your employer if you elect to have them contribute to a superannuation plan;
- any institution, court, agency or authority (including law enforcement authorities) to whom we are required to disclose information by law including, without limitation, anti-terrorism and anti-money laundering laws and regulations, and for the purpose of fighting crime and terrorism and the U.S. Foreign Account Tax Compliance Act;
- any of our group companies, offices or branches or any person or company working for us (including professional advisers or professional service organisations such as legal, audit and accounting service providers, technology and data processing companies and IT hosting providers); and
- any person or company that provides products or services to you in connection with your account.

Normally, we require that organisations outside the SFG group of companies who handle or obtain personal information as service providers to SFG acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Australian Privacy Principles (APP) and this Policy.

In providing services to you, we may from time to time engage an outsourced service provider in a country outside of Australia who we are required to disclose your personal information. Some of these service providers are located in Australia but have infrastructure and offices located in countries outside of Australia.

The countries and associated activities that we may directly disclose your personal information is set out in the table below.

Service requiring personal information to be disclosed to an overseas recipient	Country personal information may be disclosed to
SMSF Accounting and administration services	India
Receipt or payment of superannuation benefits	United Kingdom, New Zealand.
International share-broking	United States, Canada, New Zealand, Hong Kong, Singapore. United Kingdom and Japan and other European countries that SFG clients may wish to trade.

Generally we will require any outsourced service providers that we disclose your personal information to comply with the APPs.

Our documents will normally seek your consent to disclose your personal information outside of Australia where this is likely to occur. Where you provide your consent to disclose your personal information to recipients overseas and the overseas recipient handles the information in breach of the Privacy Act or the APPs, SFG will not be accountable under the Privacy Act and you will not be able to seek redress under the Privacy Act. You should also be aware that any overseas recipient of personal information may not be subject to any privacy obligations or any principles similar to the APPs and you may not be able to seek redress in the overseas jurisdiction or any privacy issues that may arise.

7. Sensitive information

Certain personal information is defined by the Privacy Act as sensitive information which requires that there be extra measures in place to protect that information. SFG will only collect sensitive information with your consent and only use and disclose sensitive information for the purposes for which it was provided, unless you agree otherwise, or the disclosure is allowed by law.

8. How do we keep personal information secure and current

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium.

SFG will endeavour to keep secure any information which we hold about you, and to keep this information accurate and up to date. Your information is stored as a paper file and/or on secure servers that are protected in controlled facilities located in Australia.

We require our employees and data processors to respect the confidentiality of any personal information held by SFG. Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure, so we cannot give an absolute assurance that the information you provide to us will be secure at all times. SFG shall not be responsible for events arising from unauthorised access to your personal information unless required by statute.

You can also play an important role in keeping your personal information secure, by maintaining the confidentiality of any password and accounts used on the SFG website.

We may need to maintain records for a significant period of time to fulfil our legal obligations. However, once we consider information is no longer needed, we may remove any details that identify you or we may securely destroy the records.

9. Accessing your personal information

If at any time you want to know exactly what personal information we hold about you, you are welcome to access your record by contacting contact the SFG Privacy Officer by emailing us at privacy@sfg.com.au. We may not always be able to give you access to the personal information that you have requested. We will not provide you with the information that you have requested where:

- the information reveals the personal information of another person; or

- the information reveals our commercially sensitive decision making process; or
- we are prevented by law from providing it to you; or
- the information relates to an existing or anticipated legal proceeding(s).

You may update or correct your personal information online (where this service is available) or by contacting us using the appropriate telephone number listed in the 'Contact us' section of this policy. If you wish to have your personal information deleted, please let us know and we will take all reasonable steps to delete it unless we need to keep it for legal reasons.

10. Anonymity

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you enquire about our products or services.

11. Privacy enquiries and complaints

If you have any further queries relating to our Privacy Policy, or you have Privacy complaint, please contact SFG Privacy Officer by emailing us at privacy@sfg.com.au. We will respond to your problem or complaint within 30 days of receipt of the complaint. If following our response you wish to take the complaint further, you may take your complaint to the Office of the Australian Information Commissioner.

If you are not satisfied with our response to your complaint you may contact the Financial Ombudsman Service (FOS) who can consider some privacy complaints involving providers of financial services. FOS has the discretion to exclude some complaints, for example where the complainant is not a retail client or where the complaint falls outside of its terms of reference. Privacy complaints relating to Shadforth Lending Services Pty Limited (ABN 31 107 323 204) may be made to the Credit Ombudsman Service (COS). Contact details for FOS and COSL are:

Financial Ombudsman Service GPO Box 3 Melbourne Victoria 3001 Phone 1300 780 808	Credit Ombudsman Service PO Box A252 South Sydney NSW 1235 Phone 1300 555 727
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Alternatively, if you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted at:

Office of Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Phone 1300 363 992
Website: www.oaic.gov.au

12. Contact us

You may contact us on the number below to update or correct your personal information.

Shadforth Financial Group	1300 308 440
Western Pacific	02 9250 1568
finHQ	1300 693 464
Mosaic Portfolio Advisers Limited	1300 693 464
Lachlan Partners	1800 643 641

Web supplement

13. Cookies

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. If you use our website, you should be aware that SFG uses cookies to make use of our website and services as convenient as possible. Cookies in and of themselves do not personally identify users, although they do identify a user's browser. Cookies are useful to estimate our number of members and determine overall traffic patterns through our website.

Cookies also are necessary for us to provide you with many of the services available on our website. If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to use some of SFG's services.

14. When we will contact you

We may contact you at the email or other address which you provide to us in order to:

- provide you with information about your investments;
- provide you with updated information about our website; and
- provide you with other information about our products and services which may interest you.

15. Advertising

We will not send you advertising information without first asking you whether you wish to have promotional information sent to you. If you are receiving promotional information about SFG and do not wish to receive this information any longer, you may remove your name from our list either by visiting our website and following the instructions on how to withdraw your information from that site (where that facility is available), or e-mailing us at privacy@sfg.com.au

We do not disclose information about you to advertisers. Instead, advertisers give us advertisements and tell us the kind of audience they wish to reach. SFG then takes the advertisement and displays it to users who are most likely to have an interest in the product or service.

16. Password and log-in security

If applicable for the purposes of accessing your accounts via the web, you will be supplied with a user name and password. You are responsible for the security of your password and log-in information. You take responsibility to ensure the confidentiality of this information. Please notify us immediately if there is any unauthorised use of your account by any other internet user or any other breach of security.

17. SFG and links to other websites

SFG provides links to websites outside of the SFG service. These linked sites are not under the control of SFG, and we are not responsible for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the Terms and Conditions of those websites.