

This guide is designed to help you evaluate our service offer and covers key information about:

- What services and financial products we are authorised to recommend;
- The costs associated with our services;
- How we and our associates are remunerated;
- Any potential conflict of interest; and
- Our internal and external dispute resolution process and how you can access them.

Financial planning process

Upon offering financial advice we will provide you with an advice/disclosure document that will help you assess our recommendations to you and determine whether you wish to rely on our advice. Prior to giving you advice we will make reasonable enquiries about your current financial situation and future needs to ensure we provide appropriate advice aligned to your particular circumstances.

Your Financial Adviser is required by law to record and verify details about your objectives, financial situation and needs. You are entitled to share with us as much or as little as you choose, however, should you choose not to provide full disclosure, we will need to make you aware of the following:

- Where the service relates to financial products, we will warn you about possible consequences of the advice limitations so that you can make up your own mind if you will proceed; and
- Where this service relates to credit products, we are unable to provide assistance.

The advice/disclosure document will set out:

- Our personal advice and the reasoning which led to the advice;
- Fees and commissions we may receive; and
- Associations we have with financial product issuers or other parties which may have the potential to influence the advice we give you.

We will not provide credit assistance where we determine that a credit contract is unsuitable. A contract will be unsuitable if we establish:

- That you will be unable to comply with the obligations under that contract without substantial financial hardship; or
- The contract does not meet your financial and personal needs in accordance with your objectives.

We can provide you with a copy of our assessment for up to 7 years after you sought our advice. This assessment is provided

at no cost and can be accessed within 7 business days for all requests made within 2 years of our service agreement or advice document. For engagements outside of this period, we require 21 business days' notice. Copies of assessments are provided at no charge.

Agreeing the subject matter of the advice

To make sure there is a clear understanding of the services to be supplied to you we will listen to your instructions, your reasons for seeking advice, we will determine your needs and objectives, in order of priority and their importance to you. Once we have taken these factors into account we will discuss and agree the subject matter of our advice to you along with the cost of providing that advice. Our advice document will outline the subject matter of advice, clarifying what has been included and what has been excluded as agreed.

Where we recommend a particular financial product to you, we will give you information about that product by providing you with a Product Disclosure Statement. This will help you make an informed decision when considering the product.

If you do not wish to receive our advice, we may deal on your behalf by carrying out your instructions on an "execution only" basis. If you do not obtain advice, you face the risk that the financial product(s) you select will not fully take into account your objectives, financial situation or needs.

Who is responsible for the financial services provided?

Infocus Securities Australia Pty Ltd (Infocus) is responsible for the financial services provided by your Financial Adviser including authorising the distribution of this Financial Services/Credit Guide (FSG). Infocus holds an Australian Financial Services Licence and Australian Credit Licence No. 236523. The Infocus head office is located on Level 2, Corner Maroochydore Road and Evans Street, Maroochydore QLD 4558 and can be contacted on (07) 5458 9400 or by writing to PO Box 1856, Sunshine Plaza QLD 4558 or visiting www.infocus.com.au. Information about your Financial Adviser is detailed on the insert attached.

How can I give you instructions about services provided to me?

You can generally provide instructions to us either face to face, in writing, by telephone, fax or other agreed means such as e-mail. At the time, we will advise you which instructions must be provided in writing.

What kinds of Financial Services and Financial Products are Infocus authorised to provide me and what kinds of Financial Product(s) do those services relate to?

Infocus provides the following services:

- Advice
- Wealth creation
- Wealth preservation
- Gearing
- Retirement planning
- Estate planning
- Corporate & personal superannuation
- Debt reduction & mortgage management
- Self managed superannuation funds
- Life Insurance & Income Protection

Infocus provides advice on, and deals in the following Financial Products:

- Deposit and payment products, limited to:
 - Basic deposit products
 - Deposit products other than basic deposit products
- Debentures, stocks or bonds issued or proposed to be issued by a government
- Life products, including:
 - Investment life insurance products
 - Life risk insurance products
- Interests in managed investment portfolios, including:
 - Investor directed portfolio services
 - Retirement savings accounts
- Securities
- Superannuation
- Managed investment schemes
- Margin lending products

Infocus provides Credit Services, including:

- Assistance with mortgages, personal loans & credit cards

Please refer to the Fee/Brokerage/Commission Schedule which is attached to this Financial Services Guide, as this will explain any restrictions your Financial Adviser has in providing advice to you. This Financial Services Guide is complete when the Fee/Brokerage/Commission Schedule is attached.

Further advice

Where you are provided with further advice, this may be provided to you verbally and/or in writing as an advice document. An Advice Document will be in the form of a Record of Advice (RoA) or a Statement of Advice (SoA). Should you require additional copies of advice documents or a copy of a record of the verbal advice given, you may ask your Financial Adviser to provide you with a copy at any time within 7 years from the latest date advice was provided.

Does Infocus have any relationships or associations with Product Issuers?

Managing conflicts of interest

Infocus provides a comprehensive range of financial services. Our network of Financial Advisers bring specialist expertise to bear and apply this expertise to helping you understand and manage complexity.

Any recommendation will be based on an assessment of your personal circumstances, needs and objectives. In addition, all products approved for use by our Financial Advisers must first undergo a rigorous selection process. These factors underpin our advice but it is important for you to appreciate that our interests, associations, relationships and the benefits we receive – such as commissions, sponsorships or marketing allowances – may give rise to an actual or potential conflict of interest. We manage, and will clearly disclose any conflicts that we believe may influence our advice.

Related parties/entities

Infocus Wealth Management Limited is the parent company of Infocus Securities Australia Pty Ltd, Portfoliofocus Pty Ltd (Portfoliofocus), Portfolio Administration and Reporting Pty Ltd and Alpha Fund Managers Pty Ltd (Alpha). Alpha Fund Managers Pty Ltd operates as investment manager for the Alpha fund series of investments with Equity Trustees Ltd operating as the responsible entity.

Other relationships

Portfoliofocus and Portfoliofocus Administration and Reporting and/or Infocus provide services to product providers or act as the marketing entity for a number of providers including Australian Money Market Pty Ltd (Portfoliofocus Money Market), Praemium Australia Pty Ltd (Portfoliofocus Choices and Infocus Managed Accounts), SuperIQ Pty Ltd (Portfoliofocus SMSF), Oasis Asset Management Limited (Portfoliofocus Investment Service, Portfoliofocus Master Trust and Portfoliofocus Direct Share Trust) Avanteos Investments Limited (Ultimate Super and Pension Service, Ultimate Investment Service), HUB24 (Infocus Investment Hub and Infocus Super Hub), IOOF Pursuit Focus for Infocus, IOOF Pursuit Select for Infocus and Navigator Australia Limited (Portfoliofocus Premium and Portfoliofocus Essentials). Infocus Securities Australia Pty Ltd provides research services to Praemium Australia Pty Ltd through Portfoliofocus Choices.

In addition Infocus or its associated entities can receive various payments from financial institutions based on the average balance of all funds placed by Infocus Authorised Representatives in each relevant institution's investment or the value of insurance premiums. These payments include rebates, marketing arrangements etc from a number of preferred administrative platform/s or product providers. Payments can be received as a percentage of business placed/retained, profit share arrangement/s or an agreed dollar amount. Please note these payments are made by the product provider to Infocus and not charged to you.

Platform/Provider	Additional payment receivable if \$10,000 was invested or \$1,000 was paid as an administration fee/ service fee or insurance premium
Investment products	\$44 pa
Administration platform/ service	\$500 pa
Risk products	\$255 pa
Corporate super	\$27.50 per member pa

For example, the maximum additional payments we are entitled to receive are shown above. For example, if you had \$10,000 invested for a year in an investment product that paid an additional 0.30% pa, the annual payment to Infocus would be \$30 (0.30% of \$10,000) and this payment would be paid as long as you continue to hold that product.

These payments are received from AIA Australia Limited, Asgard Capital Management Ltd, Asteron, BT Portfolio Services, Colonial First State, Colonial Geared Investments, Commonwealth Bank of Australia, HUB24 Custodial Services Limited, IOOF Investment Management, Macquarie Investment Management, Macquarie Bank Limited, Macquarie Life Limited, MLC Limited, Oasis Asset Management, OnePath Funds Management, OnePath Custodians Pty Ltd, Praemium Australia Pty Ltd, Russell Investments Group, TAL Life Limited, SuperIQ Pty Ltd, Symetry Limited, UBS Global Asset Management (Australia) Ltd, Zurich Australia Limited and Alpha Fund Managers. From time to time these administrative platform/s and product providers may be removed according to ever changing services and products being made available to the industry and their competitive position.

Where these payments are shared with our Authorised Representatives, we will provide further details in your advice document.

In addition to the above payments, financial institutions may pay Infocus to attend the Infocus annual training conference or to sponsor other training days under an Alliance Partner Program (APP). These payments offset the costs associated with the delivery of training and support to our Authorised Representatives.

Infocus has the option of providing a buyer of first resort agreement to business owners of its offices. This provides the business owner with an option for sale of their financial planning practice to Infocus. The sale price is based on the practice's annual revenue with additional consideration provided for most Alliance Partner Program products.

How will I pay for the services provided?

You may pay us a fee. Alternatively, we may receive a payment called brokerage/commission, which is paid to us by the financial product issuer. We will give you a disclosure/advice document containing details of our fees and any payments made to us by a financial product issuer.

The attached Fee/Brokerage/Commission Schedule outlines the costs you may incur if you decide to receive personal financial advice from us.

What information is maintained in my file and can I examine my file?

We maintain a record of your personal profile including details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you. We are committed to implementing and promoting a privacy policy, ensuring the privacy and security of your personal information. Our privacy policy (available at www.infocus.com.au) sets out in detail our policies on the management of personal information. You can obtain a copy free of charge from any Infocus office or by contacting the Infocus Professional Standards Manager by telephone on (07) 5458 9400 or writing to PO Box 1856, Sunshine Plaza QLD 4558.

If you wish to review your file, please contact us and we will make your information available to you.

What should I do if I have a complaint?

If you have any concerns about the service provided to you, please contact the Infocus Professional Standards Manager on (07) 5458 9400 or put your complaint in writing and send it to the Professional Standards Manager, PO Box 1856, Sunshine Plaza QLD 4558. We will aim to resolve your complaint quickly and fairly. If the complaint cannot be resolved to your satisfaction within 45 days, you have the right to refer the matter to the Financial Ombudsman Service of which Infocus is a member. The Financial Ombudsman Service can be contacted by calling 1300 780 808 or in writing to GPO Box 3, Melbourne Vic 3001.

Infocus maintains Professional Indemnity (PI) Insurance which covers claims in relation to the conduct of Authorised Representatives who are no longer authorised by Infocus, but who were at the time of the relevant conduct.

Is Infocus a member of any associations?

Infocus is a corporate member of the Association of Financial Advisers Limited (AFA) and the Financial Services Council (FSC). As a member of these organisations, Infocus is required to adhere to the FSC and AFA's standards.

In addition, Infocus maintains and also requires its representatives to maintain registers for any alternative remuneration received, where such remuneration is material. The register is referred to as the 'Alternative Forms of Remuneration Register'. The register provides for the following:

- Details of alternative forms of remuneration received;
- It is maintained by fund managers, IDPS (platform) providers, representatives and licensees; and
- Registers are publicly available and will be provided upon request.

If you have any further questions about the financial services Infocus provides, please contact your Infocus Financial Adviser.

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The Pattinson Financial Services office:

Address: 2/11-13 Brookhollow Avenue,
Baulkham Hills NSW 2153
Postal Address: PO Box 6253
Baulkham Hills NSW 2153
Phone Number: (02) 8850 6888
Fax Number: (02) 8850 6407
Internet: www.pattinsonfs.com.au

Who is my Adviser?

Here at the Pattinson Financial Services office your advisers will be:

Ashley Pattinson Dip FS (FP), Ch LP
Senior Financial Adviser
Authorised Representative - No. 307484

Helen Savage B Bus (FP), Dip App Sc (Hons)
Financial Adviser
Authorised Representative - No. 1238006

Naimul Chowdhury Dip FS (FP)
Financial Adviser
Authorised Representative - No. 411454

Adviser Authorisation and Remuneration

The Pattinson Financial Services office is operated by Ashley Pattinson through Pattinson Financial Services Pty Ltd (ABN 17 121 851 376). Pattinson Financial Services Pty Ltd receives 100% of the fees and or commission, the licensee, Infocus Securities Australia Pty Ltd (Infocus) receives the balance, being 0%.

Pattinson Financial Services Pty Ltd is a corporate authorised representative (No. 307485) of Infocus. Ashley, Helen and Naimul are authorised representatives of Infocus and are authorised to provide the full range of financial services and products offered by Infocus, as outlined in the FSG Brochure provided to you with this insert except as follows.

Ashley and Helen are not authorised to provide advice in Securities, Margin Lending Products, Credit Services, including: assistance with mortgages, personal loans & credit cards.

Naimul is not authorised to provide advice in Securities, Credit Services, including: assistance with mortgages, personal loans & credit cards.

Ashley is remunerated by means of a salary. Further, as an associate of Pattinson Financial Services Pty Ltd, Ashley or his associates may receive other benefits from all fees and commissions that may be paid.

Helen and Naimul are remunerated by means of a salary and commission paid by Pattinson Financial Services Pty Ltd.

Privacy

Pattinson Financial Services may decide to share your information with entities that are located in, or have operations in other countries, specifically the Philippines. For full details of how we deal with your personal information please refer to our Privacy Policy which can be obtained from our website - www.pattinsonfs.com.au.

How Will I Pay for the Services Provided?

There are various ways that you may pay for the services we provide, including:

- **Professional Fees** - where you pay a fee to Infocus for all the services that we provide (including the Statement of Advice (SOA) and implementation and review of the advice). This may be charged by direct invoice, deductions from your investment products or a combination of both;
- **Brokerage/commissions** - where the investment product provider pays Infocus upon your initial investment (initial Fees & Charges) and/or regularly throughout the life of your investment (ongoing Fees & Charges); or
- **A combination of both** - where you pay for the cost of the SOA and a percentage for the product/investment placement, which may include initial Fees & Charges and/or ongoing Fees & Charges.

The percentage rates and dollar amounts shown in this FSG are inclusive of GST. All fees and commissions payable, both initial and ongoing, attracts GST of 10%.

Your fees will be discussed between you and your adviser before any recommendations are made and services provided to you. The agreed fees will be disclosed in the SOA.

Hourly Rates

Hourly rates are usually applied for the initial formulation of financial planning or salary sacrificing advice and strategies will be detailed in a Statement of Advice.

Hourly rates for the Pattinson Financial Services office of Infocus are:

- Senior Financial Adviser \$440.00 per hour
- Financial Adviser \$275.00 per hour
- Planning Assistant \$165.00 per hour
- Administrative Assistant \$110.00 per hour

Additional fees may also be incurred for the ongoing management of your Portfolio (please refer to the Ongoing Fees & Charges).

Professional Advice Fee

A typical cost for an initial advice would range from \$2,500 for a simple Statement of Advice up to \$10,000 for a more detailed and sophisticated Statement of Advice. The price will depend on the complexity of your situation and needs.

Initial Fees & Charges

A maximum* fees applicable for investment placement or superannuation rollovers' of up to 4.4% may be incurred.

Example

For example, if you invested \$75,000 and agreed to a fee of 4.4%, \$3,300 would be payable.

The initial Fees & Charges applicable to regular investments will be re-assessed at each review appointment.

**The maximum sliding scale of fees excludes any initial Fees & Charges payable in relation to tax effective/agricultural scheme is 11%. The initial Fees & Charges are paid by the product provider and is not an additional cost to the investor.*

Additional fees may also be incurred for the ongoing management of your Portfolio (please refer to the Ongoing Fees & Charges).

Ongoing Fees and Charges

The ongoing Fees & Charges can be made up of a combination of any or all of the following:

- A flat fee of between \$550 and \$6,600 per annum.
- Ongoing strategy management of up to 1.00% * (per annum) of funds under management.
- Ongoing portfolio management of up to 1.00% * (per annum) of funds under management.

Example

For example, if you invested \$75,000 and agreed to an ongoing flat fee of \$6,600 per annum plus an ongoing strategy management of 1% * (per annum) being \$750 and an ongoing portfolio management of 1% * (per annum) being \$750 a total ongoing fee of \$8,100 would be payable.

On occasion, hourly rates may be applied for specific advice needs or where there is a significant change required to your financial strategy (for example, when you retire or if you received a redundancy payment). In this case, the hourly rates above will apply.

If no ongoing fee is applied an hourly rate may be charged for further services provided.

Personal Insurance

Unless we advise you otherwise, we are remunerated by commission from the relevant insurer whenever you enter into an insurance policy arranged by us (including renewal and some variations).

The commission is a percentage of the insurer's base premium (that is the premium excluding stamp duty and any other government charges). The commission ranges between 0% and 135% in the first year and 0% and 40% per annum in subsequent years. The commission paid to us is utilised to cover our ongoing administration costs in relation to the insurances we recommend.

The commission is paid by the product provider and is not an additional charge to you.

Benefits from Product Issuers

Infocus and/or its related entities (e.g. Ultimate) may receive up to a maximum of 3.3% per annum of funds under advice and up to 27.5% of insurance premiums generated. This is in addition to any fees, commissions or other benefits from a product issuer on a monthly or quarterly basis.

Your SOA will disclose any benefits or fees received by Infocus and/or your adviser.

Referral Fees

A third party referrer may receive a referral fee or commission for introducing you to an Infocus office or we may receive your details as a referral from others. The payment of any fee for a referral, whether received or payable will not involve an additional cost to you. Any referral fees will be disclosed at the time of the referral and/or detailed in your Statement of Advice.

All of the above fees and commissions are inclusive of GST.

Note: This Fee Insert completes your Financial Services/Credit Guide.

Privacy Policy

Version No 9 201503

Our Commitment

We are part of the Infocus Wealth Management Group (the 'Group'). We value your trust, and aim to help you manage your financial needs and objectives to allow you to live the life you want to live. The protection of your personal information is a vital part of this relationship. It is supported by our dedication to keeping personal information confidential.

Personal information is information or opinion that allows others to identify you. It includes your name, age, gender, contact details, as well as your health and financial information.

We will act to protect your personal information in accordance with the Australian Privacy Principles. We only collect the personal information we reasonably require, in the course of our business of providing services, in accordance with this Privacy Policy by lawful, fair and non-intrusive means. We co-operate with police and other enforcement bodies as required or allowed by law.

We collect personal information to provide you with the products and services you request as well as information on other products and services offered by or through us. The law also requires us to collect and retain personal information. Personal information may be used and disclosed within the Group to administer our products and services, as well as for risk management purposes and, unless you tell us otherwise, to provide you with related marketing information.

You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please let us know so that we can correct it.

Further information and feedback

Further information and Feedback

The pages that follow set out more detailed information about our privacy and information handling practices. If you have any questions or would like further information on our Privacy Policy or information handling practices, please contact our Professional Standards team by

Phone: 07 5458 9400

Email: ProfessionalStandards@Infocus.com.au

Mail: PO Box 1856 Sunshine Plaza Qld 4558

Members of our Group

The Infocus Group includes Infocus Wealth Management Limited ABN 28 103 551 015 and its related bodies corporate. It also includes our Corporate Authorised Representatives and Authorised Representatives.

Members of the Group that have collected personal information are permitted by the Privacy Act to disclose personal information to other members of the Group. This enables the Group to have an integrated view of its clients. We only share information where this is relevant to the purpose as set out above.

Members of our Group and a brief description of the services they provide:

Subsidiaries

- Infocus Securities Australia Pty Ltd ABN 47 097 797 049 (Holds an Australian Financial Service License and an Australian Credit License No 236523)
- PATRON Financial Services Pty Ltd ABN 13 122 381 908 atf the PATRON Financial Trust ABN 32 307 788 137 trading as PATRON Financial Advice (PATRON) (Holds an Australian Financial Services Licence Number 307379)
- Alpha Fund Managers Pty Ltd ABN 37 124 085 883 (Investment Manager for the Alpha Fund Series)
- Commission Refunders Pty Ltd ABN 35 151 902 457 (Provides commission collection services)
- Portfoliofocus Pty Ltd ABN 49 098 278 589 (Marketing and promotional services)
- Portfolio Administration and Reporting Pty Ltd ABN 85 145 006 757 (Marketing and promotional services)
- Platformplus Pty Ltd ABN 46 103 551 533 (CRM and Service Management software)

Affiliated entities

Infocus Securities Australia Pty Ltd (Licensee) has authorised a number of corporate entities and individuals to provide financial and credit services on its behalf. This list changes from time to time and details of our current authorised entities is available on the Infocus website at

<http://www.infocus.com.au/offices/all> or just ask us.

Collection of your Information

What we collect and what we use it for

Personal information is information or opinion that allows others to identify you. It includes your name, age, gender and contact details. The kinds of personal information we collect and store will depend on what products and services you request from us. However, our ability to provide you with service and advice that meets your particular needs and objectives may entail us collecting information which may include any or all of the following:

- (a) Your contact details including names, address, phone and email address;
- (b) details of your financial needs and objectives and what hardship means to you;
- (c) personal details including your date of birth, associated entities, visa and residency status, private healthcare and smoking status;
- (d) your occupation, marital status, financial dependants and identification details such as copies of birth certificate or drivers licenses or other documentation;
- (e) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, general insurance, superannuation and taxation;

- (f) details of your investment preferences, past experience and aversion or tolerance to risk;
- (g) details of any professional advisers you engage with;
- (h) estate planning details;
- (i) information about your employer, your employment history including future, family commitments including dependents and social security eligibility;
- (j) your tax file number;
- (k) personal and family medical history and /or lifestyle pursuits; and
- (l) your agreement to grant access to a spouse or partner's information.

We will collect, maintain and use personal information both initially and ongoing which is necessary for us to adequately provide the services you have requested including:

- (a) preparation and provision of initial financial advice;
- (b) preparation and provision of ongoing financial advice;
- (c) placement of financial products including purchase, variation or redemption of investments;
- (d) provision of a financial service, such as actioning share buy/sell instructions;
- (e) provision of a financial service, such as purchase, variation or cancellation of insurance products;
- (f) set up and administration of a Self-Managed Super Fund;
- (g) providing assistance with ancillary services such as Centrelink;
- (h) providing assistance with the coordination of other providers or experts such as solicitors, accountants etc;
- (i) providing credit assistance such as assisting to establish, terminate or vary a loan contract; and
- (j) providing credit services by sourcing and recommending appropriate loan arrangements.

As well as providing us with information upon which to provide a customised solution to your particular needs and objectives, we are required under the Corporations Act 2001 and the National Consumer Credit Protection Act 2009 to collect and hold this information.

It is possible that additional information may be collected to allow assessment by insurance providers so they may accept your proposal and, if so, determine terms. This information is only collected where necessary and may include details of your sexual activities and/or personal pursuits.

In addition, we use your information to administer our client relationships.

How we collect information

We will not collect personal information about you except when you have knowingly provided that information to us or have authorised a third party to provide that information to us via their privacy controls. In most cases collection of your personal information will be via face to face interviews, over the telephone, email or by way of your completion of a financial fact find. From time to time, other service providers may provide us with your information for the purpose of our providing a service to you (referral). In this case we will contact you to determine if we can be of any assistance.

We may seek your express permission to collect information from other entities such as product providers, accountants, solicitors, etc where this information may not be currently available to you. If we were to obtain information that is not information that could have been provided or authorised for collection by you, we will de-identify and destroy this information unless it is unlawful to do so.

Identification documentation is required for collection by law under the Anti-Money Laundering and Counter Terrorism Financing Act 2006. In some instances, we are required to verify this documentation against other records. For instance, identification for Australian companies, trusts or registered co-operatives may need to be verified by a search of records held by regulatory bodies such as Australian Securities and Investments Commission, Australian Taxation Office etc.

Use and disclosure

We will not use or disclose personal information collected by us for any purpose other than:

(a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or

(b) where you have consented to such disclosure; or

(c) where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are obliged to maintain records which include personal information and make those records available for inspection by the Australian Securities and Investments Commission or other regulators under a relevant law. If we provide information for the purpose of law enforcement activities we will make a record of that provision.

If you chose not to provide your information

The effectiveness of our services is specifically dependent on information you provide and it being relevant, complete, accurate and up-to-date. Without this, our services may not meet your needs or may cause you to suffer unforeseen financial consequences.

If you elect not to provide us with your personal information as and when requested, we may not be able to provide you with financial planning service and/or advice. Similarly we may not be able to provide credit services or credit assistance.

Marketing

We may use personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however if you do not wish to receive such information you can request not to receive it. Simply contact us by any of the methods detailed below. There is no cost for this request but please allow 2 weeks for your request to be actioned.

In order to ensure that you receive a personally tailored service, your personal information will be made available to Infocus authorised representatives and staff for the purposes of assisting you as necessary.

It is a condition of our agreements with each of our authorised representatives (both personal and corporate) that they adopt and adhere to this Privacy Policy. You can be assured that all authorised representatives and their staff will maintain your information in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

Disclosing information to other parties

In order to provide our service, we may disclose your personal information to external parties as follows:

- (a) other entities who refer your business to us;
- (b) affiliated product and service providers as well as external service providers such as superannuation fund trustees, insurance providers, and product issuers for whom we act as agent (so that they may provide you with the product or service that you seek or in which you have an express interest);
- (c) auditors we appoint to ensure the integrity of our operations;
- (d) suppliers from whom we order goods and services on your behalf (so that those goods and services can be provided to you);
- (e) other persons acting on your behalf including your accountant, solicitor, executor, administrator, trustee, guardian or attorney;
- (f) if required or authorised to do so, regulatory bodies and government agencies;
- (g) medical assessment services where you have sought insurance for the purposes of underwriting your policy;
- (h) other organisations who in conjunction with us provide their products and services (so that they may provide their products and services to you); and
- (i) other Australian Financial Services Licensees or Authorised Representatives or their agents for the purpose of due diligence on one of our associated entities were they were to decide to sell all or part of their business. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer and your information will not be exchanged if you object to the transfer.

If we have used an example to describe when we might exchange personal information, the exchange of personal information may not be limited to those examples or examples of a similar kind.

We disclose personal information when we outsource certain functions, including paraplanning, telemarketing, bulk mailing, market research, direct marketing, and information technology support. We also seek expert help from time to time to help us improve our systems, products and services.

In all circumstances where personal information may become known to our contractors, agents, Australian Financial Services Licensees, Authorised Representatives or their agents and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents, other Australian Financial Services Licensees, Authorised Representatives or their agents and outsourced service providers are not able to use or disclose personal information for any purposes other than our own.

The Group takes its obligations to protect client information very seriously and we make every effort to deal only with parties who share and demonstrate the same attitude.

Sending personal information overseas

Although we don't send personal information overseas, you should be aware of the following:

your personal information may be accessed by our Group staff, representatives or agents in other countries, if that becomes necessary to deliver our services to you. This access is via secure internet connection or, in some instances by email;

from time to time, information may be loaded to the cloud for storage or access through programs such as Dropbox etc; and

it is possible that product and services providers we recommend may outsource functions using overseas contractors or companies that process these services using offshore resources. Where this is a concern to you, we suggest that you carefully read their privacy policy to determine the extent to which they send information overseas.

We allow access to relevant personal information for external organisations that help us provide services. These organisations are bound by confidentiality arrangements. From time to time we may use service providers whose staff accesses our data outside of Australia to provide services. Where this is the case, these service providers have committed to adhere to the Australia Privacy Principles. These service providers may be located in a number of countries however, we are not aware of any at this stage. We will update our policy if and when this situation changes.

Website and email

When you visit our website, details may be recorded about your visit, such as time and date, your computer IP address, pages accessed, time spent on page and type of browser. This information is used in an anonymous format for statistical purposes and as such cannot identify you individually. When you log into the client section of our site, we may use cookies to identify who you are, while you are logged in for the session. The cookie is unique to that session, and the data within the cookie is encrypted. You must have cookies enabled to be able to

use our site. Our website may contain links to other websites. When visiting these websites be sure to check the privacy policy as we are not responsible for privacy practices of those other parties.

Where you chose to communicate with us by email, we will store your email, name and address with any other contact or personal details you have provided on our database.

Identifiers

We will not adopt as our own any identifiers that you may provide to us such as TFNs, Centrelink, Medicare numbers etc. If you have provided us signed consent, we may hold your identifiers on file so that we can provide ongoing services to you. If you chose not to provide this consent we will not hold this information on file.

Accessing and correcting your information

Our goal is to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact us if you believe that the information we have about you is not complete, accurate and up-to-date. We may take steps to update information, for example, an account balance from your account service provider where you have provided us with access rights or an address or contact number from publically available information such as telephone directories or websites.

If you ask, we will tell you what personal information we hold about you within your client file, and what we do with it. On receipt of your request we will facilitate access to you by allowing an inspection of your client file in person, or by providing copies or an accurate summary of relevant documents, depending on what we believe is most appropriate in the circumstances. You can ask us to update or change information on your file at any time. Prior to providing this access we will require you to provide evidence of your identity. We may ask you to put your request in writing and any charge we make for providing access will be reasonable.

If for whatever reason we refuse to change information we hold on your file, we will arrange for a statement from you to be associated with the relevant information so that it can be included in any future use or disclose of that information should you wish to do so.

When we make reference to your client file we mean the following documents: Data collection forms; Written communications (such as letters and emails) from you to Infocus, and from Infocus to you; Statements of Advice; Records of Advice; Transaction letters; Signed authorities to implement advice; Investment, Superannuation and Personal Insurance applications or statements produced by the issuers of financial products; Fee invoices.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person or the health and safety of the public;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;

- Infocus has reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to its functions or activities has been, is being or may be engaged in and giving access would be likely to prejudice the taking of appropriate action in relation to the matter;
- providing access is likely to prejudice actions being conducted by an enforcement agency; or
- providing access would reveal evaluative information generated within Infocus in conjunction with a commercially sensitive decision making process.

In the event we refuse you access to your personal information, we will provide you with a written explanation for that refusal. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

Keeping your information secure

Your personal information is generally held in your client file and on our computer database. We will at all times seek to ensure that your personal information is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

Our security measures include, but are not limited to:

- educating our authorised representatives and staff as to their obligations with regard to your personal information;
- all hard copy files are stored in lockable cabinets/rooms;
- access to our premises is controlled by only allowing authorised personnel to access those locations where personal information is stored;
- all computer-based information is protected through the use of access passwords on each computer and screen saver passwords;
- client data is backed up each evening and stored securely off site;
- encrypting data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks;
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing; and
- providing secure storage for physical records.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in our secure storage facility for a period of 7 years in order to comply with legislative requirements. Where information we hold is identified as no longer needed for any purpose we ensure it is effectively and securely destroyed, for example, by shredding in the case of paper records and other means in the case of electronic records and equipment.

Contact Us

If you seek any further information from Infocus about this Statement or our privacy policy generally please contact our Privacy Officer at one of the reference points below:

Email: ProfessionalStandards@infocus.com.au

Address: Level 2, Cnr Maroochydore Road & Evans Street | **Maroochydore** QLD 4558

Postal: PO Box 1856 | **Sunshine Plaza** QLD 4558

Telephone: (07) 5458 9400

Facsimile: (07) 5443 1995

How to complain

We recognise that even in the best run organisations things can go wrong. If you have a complaint about privacy please tell us as we'd like the chance to fix the problem. We offer a free complaints resolution process for all our clients. Simply contact us.

To assist us help you, we ask you to follow the following three step process:

1. Gather all the supporting documents about the matter of the complaint. Think about the questions you want answered and decide what you want us to do.
2. Contact the relevant group member where your situation will be reviewed and if possible resolved straight away.
3. If at this stage the matter has not been resolved to your satisfaction, please contact the Professional Standards team using the contact points listed above. We will provide you with the contact details of the person who will investigate your complaint, answer your questions and do all they can to regain your confidence. We aim to resolve complaints within a few days, however some are more complex than others. We promise to provide our response within a maximum of 45 days.

If, after having raised the issue with us you are still dissatisfied with the outcome, you are able to escalate the complaint to an external dispute resolution scheme. Infocus is a member of the Financial Services Ombudsman Service who can be contacted by calling 1300 780 808 or by writing to GPO Box 3, Melbourne Vic 3001.