

Privacy Policy

The FinancialLink Group Holding Pty Ltd

This privacy policy applies to the services offered by The FinancialLink Group Pty Ltd (ABN 12 055 622 967, AFSL 240938) (“**TFLG**”), and its Authorised Representatives.

We respect the importance of your privacy. This Policy outlines how The FinancialLink Group manages the personal information it holds about you, our customer.

It is The FinancialLink Group’s policy to respect the confidentiality of information and the privacy of individuals. The FinancialLink Group is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act (1988) as amended via the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The FinancialLink Group Privacy Policy will be reviewed from time to time to take into account new laws, technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current The FinancialLink Group Privacy Policy.

Privacy Considerations

Keeping records about individuals is necessary and important. The information The FinancialLink Group receives from its clients is personal and confidential. Without this information however, it would be difficult to assess a customer’s needs. Both the general and common law impose confidentiality obligations on organisations such as The FinancialLink Group which in some respects are similar to those which exist with solicitor/client relationships. The FinancialLink Group supports these principles and has processes in place to respect them.

The legislation contains principles that include the following:

- Personal information must only be collected for a purpose which is lawful, and which directly relates to a function or activity of the collector;
- The collection of that personal information must be necessary for, or directly related to that purpose;
- The collector must tell the individual concerned of the purpose for which the information is being collected;
- If the collector intends to pass the information to another party, the person providing the information must be told this.
- Any information collected should be relevant, up-to-date where appropriate, and complete; and
- Once collected, the personal information must be protected by appropriate safeguards against loss, and also against unauthorised access, use, modification or disclosure to unauthorised or inappropriate persons, and other misuse.

The FinancialLink Group supports and abides by the following thirteen Australian Privacy Principles (**APP**) outlined in the Act.

PART 1: CONSIDERATION OF PERSONAL INFORMATION PRIVACY

APP 1: Open and transparent management of personal information

The FinancialLink Group have practices, procedures and systems to comply with the APP including a complaint process to deal with any complaints by individuals about The FinancialLink Group’s compliance with the APP.

APP 2: Anonymity and pseudonymity

You have the option of not identifying yourself or you may use a pseudonym where it is not required when entering transactions with The FinancialLink Group wherever it is lawful and practicable.

In most circumstances however, it would not be practicable to not identify yourself when receiving financial advice or transacting other business with The FinancialLink Group or any of its authorised representatives.

PART 2: COLLECTION OF PERSONAL INFORMATION

APP 3: Collecting of solicited personal information

The FinancialLink Group is committed to safeguarding your personal privacy. We recognise that you have a right to control 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, The FinancialLink Group will only collect and use your personal information contained within the Confidential Client Data Questionnaire and file notes for the purpose of providing you with the financial services discussed and communicated directly with you.

As The FinancialLink Group offers a variety of products and services, a number of them may be of interest to you. Any personal information we collect may be used to gauge your suitability for only the products or services that have been discussed with you. We will acquire your explicit permission before we use any personal information to gauge your suitability for any of our other products and services.

The FinancialLink Group will not collect or monitor any personal information about you without your consent. The only personal information we collect is what you tell us about yourself.

APP 4: Dealing with unsolicited personal information

Where The FinancialLink Group receives information that has not been solicited in accordance with APP 3 above or could have been solicited in accordance with APP 3, The FinancialLink Group will ensure the information is destroyed or de-identified.

APP 5: Notification of the collection of personal information

The FinancialLink Group provides identification and contact details through its various disclosure documents. The FinancialLink Group will also explain to you the purpose for collecting the information, the consequences if information is not collected, other entities requiring the information, your accessibility to your personal information, the complaints process and whether your information will be disclosed to overseas recipients.

PART 3: DEALING WITH PERSONAL INFORMATION

APP 6: Use and disclosure of personal information

We intend to use your information for the following purposes only:

- To fulfil our obligation under any contract and/or any other contract between you and The FinancialLink Group;
- To provide you with information about our products, services and/or special offers unless you explicitly request us not to;
- To ask you for your opinion or comments about our products and/or services. You may answer at your discretion; and
- To track general traffic patterns showing in usage of certain services that we offer, without identifying the usage patterns of any particular individual.

As The FinancialLink Group recognises the trust that you place in us when you give us your personal information, we will not use or disclose any information about you for other purposes without your consent, except for in exceptional cases as required by laws or where it is necessary to protect the rights or property of The FinancialLink Group, or any member of the public, or to lessen a serious threat to a person's health or safety.

APP 7: Direct Marketing

The FinancialLink Group will not use your personal information for direct marketing purposes without your Consent.

We may contact you by mail, telephone or at your email address, which you provide us in order to:

- Provide you with information which may be of interest about updates, new The FinancialLink Group products and other matters which may interest you; and
- To send you a newsletter.

You can opt out of any direct marketing.

If you are receiving communications from The FinancialLink Group and do not wish to receive this information any longer, you may remove your name from our list either by telephoning us on 1300 133 511, emailing us at enquiries@fllg.com.au or you may also write to us. Please address your correspondence to: The Compliance Manager, PO Box 5283, West End QLD 4101.

APP 8: Cross border disclosure

The FinancialLink Group will only transfer personal information about you to someone who is in a foreign country if:

- (a) We reasonably believe that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles; or
- (b) You consent to the transfer; or
- (c) The transfer is necessary for the conclusion or performance of a contract between you and the organisation, or for the implementation of pre-contractual measures taken in response to your request.

Your personal information will then only be transferred if we believe it to be for the benefit of you, or if it is impracticable to obtain the consent from you for that transfer and if so, if we believe that you would be likely to give consent.

We will take reasonable steps at all times to ensure that the information, which has been transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.

APP 9: Adoption, use or disclosure of Government identifiers

The FinancialLink Group does not use as a client identifier any number, code or other form of identifier used by any agency or other external entity (eg: your tax file number if collected). Similarly, we will not disclose any identifier assigned to an individual by an agency unless it is necessary for us to fulfil our obligations to that agency.

PART 4: INTEGRITY OF PERSONAL INFORMATION

APP 10: Quality of personal information

The FinancialLink Group will take all reasonable steps to ensure that your personal information is used and or disclosed in an accurate, complete and up-to-date manner. Naturally, this information will only be as accurate as our clients provide it to us.

APP 11: Security of personal information

The FinancialLink Group will also endeavour to take all reasonable steps to keep secure any information that we hold about you and to protect it from misuse and loss and from unauthorised access, modification or disclosure. Our employees and data processors are obliged to respect the confidentiality of any personal information held by The FinancialLink Group. We will take reasonable steps to destroy or permanently de-identify your personal information if it is no longer needed for any purpose for which the information was originally intended.

The FinancialLink Group provides links to certain industry related web sites outside The FinancialLink Group site. These linked sites are not under the control of The FinancialLink Group, and we are not responsible for the conduct of companies linked to our website. Before disclosing your personal information on any other web site, we advise you to examine the Terms and Conditions of those web sites.

As we cannot guarantee the security of communications over the Internet, we are not able to give absolute assurance that, if your personal information is provided to The FinancialLink Group via this medium, it will be secure at all times. The FinancialLink Group will not be held responsible for events arising from unauthorised access to your personal information.

PART 5: ACCESS TO, AND CORRECTION OF, PERSONAL INFORMATION

APP 12: Access to personal information

If at any time you want to know what information we hold about you, you are welcome to request your personal information by contacting us.

Under extreme circumstances we may not be able to provide you with access to your personal information. Where this is the case, we will write provide in writing, the reasons for this decision.

APP 13: Correction of personal information

If you want to change and correct personal information that is inaccurate or out of date, please let us know. To have personal information deleted, please let us know in the same manner, and we will take reasonable steps to delete your personal information unless we need to keep it for legal reasons.

What if you have a complaint?

If you consider that any action of The FinancialLink Group breaches this Privacy policy Statement or the Australian Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please forward it in writing to:

The Privacy Officer
The FinancialLink Group
PO Box 5283
West End QLD 4101

If you are not satisfied with our response to your complaint, you can phone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

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ACKNOWLEDGEMENT OF RECEIPT

Please retain pages 1 through 3 of this document with the Financial Services Guide provided by your adviser and return only this page acknowledging your receipt of this document.

I / We acknowledge receipt of the Financial Link Group Privacy Policy

Name:	<input type="text"/>	Name:	<input type="text"/>
Date:	<input type="text"/>	Date:	<input type="text"/>
Signature:	<input type="text"/>	Signature:	<input type="text"/>