

Privacy Policy

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CAPITAL PARTNERS CONSULTING PTY LTD
TRADING AS CAPITAL PARTNERS PRIVATE WEALTH ADVISERS
ABN 27 086 670 788 | AFSL 227148

CP LIFE RISKS PTY LTD
TRADING AS CAPITAL PARTNERS RISK INSURANCE ADVISERS
ACN 167 092 819 | AR 457361

10TH JUNE 2020



**Capital
Partners**

Privacy Policy

Capital Partners Consulting Pty Ltd (“Capital Partners”) recognises the sensitive nature of personal information and we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth).

Capital Partners means:

Our financial advisers, Capital Partners Consulting Pty Ltd, ABN 27 086 670 788, AFSL Number 227148, trading as Capital Partners Private Wealth Advisers

Our insurance advisers, CP Life Risks Pty Ltd trading as Capital Partners Risk Insurance Advisers, ABN 87 547 909 844, a corporate authorised representative 457361 of Capital Partners Consulting Pty Ltd.

This Privacy Policy describes our current policies and practices in relation to the collection, storage, use and disclosure of your personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website (<https://www.capital-partners.com.au/privacy-policy/>) or by contacting us.

What information do we collect?

‘Personal information’ means any details about you which can be used to identify you.

We collect your personal information to provide you with financial planning and insurance advice. This can include a broad range of information including your:

- Name, address, contract details, date and place of birth, gender
- Personal affairs including employment details, marital status, dependants (e.g. names, date of birth, school details)
- Financial circumstances including your assets and liabilities and superannuation, income and expenses, tax residency and tax returns and tax file number
- Insurance records e.g. policies and coverage, quotes and claims
- Identity documents e.g. copies of your Drivers Licence, Passport or Birth Certificate
- Legal documents e.g. trust deeds, land titles, wills, loan statements

We may also collect information about your health to advise you about insurance or estate planning. We may disclose your health information to insurers when arranging insurance for you or when handling your claim for you.

How do we collect your information?

Generally, we collect your personal information directly from you when you meet with us, when you give us your information and documentation or complete a personal summary, when you complete an application for a product, through our website when you fill out online forms or when we handle your insurance claim for you.

If you provide personal information to any of our businesses, our other businesses may have access to it e.g. Capital Partners Private Wealth Advisers may collect your personal information when advising you on investments, and Capital Partners Risk Insurance Advisers may access that information when advising you on insurance.

We may also collect your personal information from third parties such as:

- Your advisers e.g. accountants or lawyers or other industry professionals
- Product providers e.g. companies you invest with, superannuation fund trustees, insurers, your bank, as well as persons acting on your behalf like guardians and persons holding power of attorney
- Another person where you are covered under an insurance policy that covers more than one person or is taken out by someone you know
- People who refer you to us, which is generally limited to your name and contact information
- Other organisations, service providers (including software providers like marketing software and IT services) or business partners who work with us to provide you with products or services along with us
- Social media – when you connect with us on social media, we may collect your information from your profile

The purposes for which we manage your personal information

The main purposes for which we collect, store, use and disclose your personal information is to provide you with financial planning and insurance advice.

Other purposes include to:

- Provide you with information about products or services or news including by email, sms or mail. You may opt out of this at any time by getting in contact with us
- Verify your identity which we are required to do by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
- Manage your ongoing requirements or ongoing relationship with you
- Perform internal functions such as administration, accounting and meet information technology system requirements
- Refer you to other people
- Comply with legal and regulatory requirements, and prevent fraud or crime
- Help us improve our services, resolve problems, develop our products and shape our marketing strategy

Who do we disclose your information to?

We may share your information in our group as explained above in 'How do we collect your information.'

We may also disclose your information to:

- Insurers e.g. who you request us to arrange insurance with or handle a claim with, and this could include information about your health
- Product providers e.g. organisations who you ask us to arrange investments with or through, or companies you are already invested with, superannuation fund trustees, and this could include your tax file number
- Your advisers e.g. accountants or lawyers or other industry professionals
- Your bank, and persons acting on your behalf like guardians and persons holding power of attorney
- People who assist us to provide our services, including financial intermediaries from whom we obtain quotations, software providers, IT services and hosting and data security services, cloud storage providers, marketing and communication

services, administration and paraplanning services, compliance consultants and auditors, and people who help us with claims like assessors and investigators

- Other people whom we consider may provide services or products you would find useful
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event
- Regulatory bodies and government agencies e.g. ASIC or AUSTRAC, law enforcement bodies and dispute resolution bodies e.g. the Australian Financial Services Complaints Authority
- People who refer you to us

We do not sell, trade, or rent your personal information to others.

Will we disclose your information overseas?

Our preference is to use service providers that store information in Australia. Our servers are onsite in Australia and our data is backed up to an Australian cloud provider.

However we may disclose your information to service providers who are located overseas. Some of our software providers and marketing service providers are located in the USA or have data centres in the USA or Europe. We also use a transcription service who is in the USA.

What if you don't provide some information to us?

Appropriate advice may not be able to be given without complete, accurate and thorough information relating to your financial circumstances, needs and objectives.

By providing insufficient or incomplete information, you risk making a financial commitment that may not be appropriate to your needs. If any of the information you have given us is incorrect or has changed you need to notify us immediately. We also can't advise you unless you give us sufficient personal information for us to verify your identity.

Government Identifiers

We collect, use, store and disclose government identifiers such as your Driver's Licence Number or Passport Number in order to identify you for anti-money laundering and counter-terrorism financing purposes. We also collect, use, store and disclose your Tax File Number in order to provide you with financial advice e.g. to review your tax return, and implement our recommendations. We store these government identifiers in a secure

manner and we do not adopt these identifiers as a way for us to identify you.

How do we store and protect your information?

- We securely store your personal information in paper-based records in our offices, in our database in our office which is backed up to a third party cloud provider and in the software systems that we use to provide our services.

We keep your information safe by:

- Physical security measures in our office including video surveillance and restricting access to our servers
- Background and criminal history checks on employees
- Cyber security measures including multi-factor authentication on software we use, end point protection and firewalls, and segmenting our network

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

If you wish to access or correct your personal information please let your adviser know or you can write to:

Complaints Officer
Capital Partners
PO Box 163
West Perth WA 6872

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete. We may charge for providing access to personal information.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. For example, we may do this if giving access is unlawful or if giving access would have an unreasonable impact on the privacy of other people and if we can't redact their information. 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?

If you have any concerns around how we manage your personal information or about whether we have complied

with the Privacy Act or the Australian Privacy Principles, we encourage you to tell us. You can contact your adviser (6163 6100) or write to:

Complaints Officer
Capital Partners
PO Box 163
West Perth WA 6872

Your concerns will be reviewed through our internal complaints resolution process. We will acknowledge receipt on your complaint within 48 hours and advise a timeframe for response, no longer than 45 days.

It is our intention to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate further. OAIC's website is www.oaic.gov.au, and can be contacted by email on enquiries@oaic.gov.au, by phone on 1300 363 992, or in writing to:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
West Perth WA 6872

Alternatively, if an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers. AFCA's website is www.afca.org.au, and can be contacted by email on info@afca.org.au, by phone on 1800 931 678 (free call), or in writing to:

Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Web Data

Analytics data - We use technology to collect anonymous information about the use of our website, for example we use different services to aggregate data on the pages and links users visit, and to aggregate users' location data, as well to log users' server addresses, the date and time of visits, and the type of browser used. It does not identify you personally and we only use this information to improve the content and functionality of our website, to better understand our visitor traffic and to improve our services and for marketing.

Marketing analytics - We also use technology to analyse how users engage with our marketing communications e.g. how users engage with our emails. We may

aggregate this information or we could identify how specific users engage with our emails.

Cookies - In order to collect this anonymous data we may use "cookies". Cookies are small pieces of information which are sent to your browser and stored on your computer's hard drive. Sometimes the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it.

When you are identifiable – We may use a service which allows us to identify when the same IP address visits our website and to understand its activity on our website like downloading our brochures or viewing our pages. You are only identifiable to us if you provide us with your personal information through our website e.g. by completing a 'contact us' form. Your activity on our website will then no longer be anonymous because we have associated you from the information you gave us, with your IP address used to access our site.

We can then associate your activity on our website with you. If you request to connect with us on social media, we may also be able to identify your IP address, and from then on your activity on our website will no longer be anonymous.

Clients in the European Union

If the European Union's General Data Protection Right applies to you, you have the right to:

- Request access your personal information and to ask us to correct or erase it, subject to exceptions allowed by law
- Ask us to restrict the way we manage your personal information (for example if you dispute the correctness of the information)
- Request that we transfer your data to another entity
- Object to us managing your personal information at any time (e.g., you can withdraw any consent you have given us to manage your personal information). This does not invalidate the legality of our management of your personal information before your consent is withdrawn).

We are legally permitted to manage your personal information because you have agreed that we may do so, and we need to do so in order to provide our services, as well to verify your identity under the AML-CTF Act as said above.

We keep your personal information only for as long as is reasonably necessary for the purpose for which it was collected, which is generally up to 10 years after you cease to be a client to comply with legal requirements and to ensure clarification of any questions after the end of our relationship.

If you have a complaint that is not resolved by us, you may refer your complaint to the European Data Protection Supervisor: https://edps.europa.eu/node/75_en

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