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PRIVACY POLICY

This Privacy Policy sets out the information handling policies of Roberts Bridges Pty Ltd, holder of Australian Financial Services Licensee (No 412816), and any of its related bodies corporate and Authorised Representatives (hereafter 'we' or 'our').

We are bound by the Australian Privacy Principles (APP) established under the Privacy Act 1988 and Privacy Amendment (Enhancing Privacy Protection) Act, 2012 and this document details our policy on the management of your information.

Contact details:

Privacy Officer: Renee Beck

Address:

Roberts Bridges Pty Ltd

c/- Sovren Pty Ltd

PO Box 537

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APP 1 We are committed to providing professional services and respecting the privacy of your information and to managing your information in an open and transparent way.

In order to deliver our services, it is necessary to collect personal information about you, which we may do by asking you directly, or with your consent or direction, by securing the information via 3rd parties including insurance companies, banking and other financial institutions, accountants, legal advisers and others including for example your previous financial adviser.

If you have any complaint or concern about our treatment of your personal information we request that you first contact us with an opportunity to address your complaint or concern directly. Thereafter, you may contact the Privacy regulator directly at www.oaic.gov.au.

APP 2 The Privacy Acts include provisions for conducting dealings anonymously, however in the provision of our financial services we are bound by other Acts, including the Anti-Money Laundering & Counter-Terrorism Financing Act, and the Corporations Act which require us to positively identify every person and entity prior to the provision of our services.

APP 3 To deliver our services it is necessary for us to collect and record “personal information”, which we define as information that identifies you and/or contains personal information about you such as your age, your income and employment status, your present financial circumstances, your financial goals and other objectives, as well as records of discussions of significance that we may have with you from time to time.

We will seek to obtain all personal information we believe necessary to provide our financial services and will make every effort to obtain only that personal information that we believe is necessary to provide our services to the extent required by law.

Should you decline to provide us with personal information that we request – as is your right – we may decline to provide you with our services if we believe the absence of the personal information may result in inappropriate advice.

Should you neglect to provide us with information, including timely changes to prior information that we have sought, the advice or services we have provided may be inadequate and/or inappropriate for you.

APP 4 We will not collect personal information from you that you have not knowingly provided to us or where you have authorised a 3rd party to provide that information to us. Where we do obtain unsolicited personal information about you that is not required for the purpose of delivering our services, we will remove the information from our records as promptly as possible.

APP 5

We will collect your personal information in physical meetings with you, over the telephone, through secure links via our website, or via email and will from time-to-time seek to update the personal information we have secured through one or more of those methods.

Where we collect personal information about you other than directly from you we will advise you of this fact and provide any other information to you about that collection as is determined relevant in the circumstances.

Where we collect non-personal information indirectly through cookies and clear gifs on our websites we will not advise you of this fact.

APP 6

We will use your personal information for the purpose of providing our services and related purposes such as:

- To verify your identity or transactions which you may have entered into with us, including registrations for events, seminars or webinars;
- To administer and manage the provision of our products and services;
- To respond to queries, complaints or to provide you with our general customer services;
- To comply with our risk management policies, other policies and procedures; or
- To train our staff.

We will not, however, use your personal information other than for:

- A purpose made known to you;
- A purpose you would reasonably expect;
- A purpose required or permitted by law; or
- A purpose otherwise authorised by you.

In order to manage and administer our services to you, it may be necessary for us to disclose your personal information to third parties, including:

- Financial institutions, such as banks
- Our representatives, such as 'para-planners' and other administrative persons
- Organisations undertaking compliance reviews/audits of our activities
- Under such circumstances and for these reasons, we will only disclose your personal information to these parties to enable them to undertake the specified services and we will not disclose your personal information to these parties for any other purpose without your consent.

APP 7 Where you have opted-in to receive correspondence from us, we may collect and hold information such as email addresses, mobile phone numbers (for SMS correspondence) IP addresses and other information volunteered to us through surveys, questionnaires and registrations, or through information you have volunteered through 'social platforms' (e.g. facebook, LinkedIn, Instagram, Pinterest, etc) which may in turn permit limited location and/or other non-personal identification. The information we collect is used to deliver focussed, general communications to you, to schedule or register your attendance at meetings with your planner, or your interest in events or to make other appointments, and generally to communicate and improve our services to you. You may always opt-out of receiving correspondence from us.

APP 8 We hold your personal information in a combination of paper-based files and digital storage facilities. Some of your data is thus held in undisclosed data centres distributed throughout the world and thus your personal information is transferred and stored in regions that may extend beyond Australian borders. We have generally exercised a preference with the data centre provider to store all data in a 'local' region, that we believe is at least substantially similar to the way in which the Australian Privacy Principles protect the information and where there are similar 'mechanisms' (e.g. laws, legal processes, observable property rights etc) available to individuals to enforce protection of the data.

APP 9 We do not use any government-issued identifiers (such as Tax File Numbers, Business or Company Registration number, Medicare, Centrelink, Drivers Licence or Passport numbers) for use as 'identifiers' within our systems. Instead we apply our own internally generated identifiers such as account numbers to identify you with your information within our system.

We do not generally disclose internally generated identifiers unless we are compelled to do so by a law agency, or where we have contracted an agency to assist us to deliver our services to you and in such instances the disclosure of the identifier is necessary for the agency to deliver their services to us.

APP 10 We will make regular effort, including contacting you reasonably frequently, to ensure the information we have collected remains relevant for the purposes of providing our services to you, that it is up-to-date and complete.

APP 11 We are committed to ensuring the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

At all times we will treat your personal information confidentially.

We strive to keep an absolute minimum of your personal information in paper-based files in our offices preferring instead to keep as much of your personal information and other data secure in undisclosed data centres distributed throughout the world.

Where your data and personal information is held digitally, it is encrypted and there exists multiple layers of 'redundancy' such that in the rare event where your data may be lost or corrupted, it can be restored.

All authorised users of your data require 'hard' passwords and where possible, multi-factor authentication, to access your digitally stored data.

In the event an administrator of the digital data system needs to access your data, access will not be granted without your permission and an audit 'trail' of the administrator's access to your data will be made available to you on request.

Your digitally stored data is kept secure from 'mining' by other organisations, including social platforms, for the purpose of directing advertising or marketing to you.

Should you cease to be a client, we are required by law to retain your personal information for no less than 7-years, after which it will be removed from our system without notice to you.

APP 12 You may request access to the personal information we hold at any time, by contacting us and so long as we judge your request to be reasonable, we will endeavour to provide the information to you, in its entirety, within a reasonable period of time by either:

- Supplying copies of the information; or
- Allowing you to view or inspect the information residing on our systems

Where we will refuse a request to provide you with access to your personal information is where:

- We believe the request to be unreasonable or vexatious;
- Providing access would prejudice negotiations we are entered into with you;
- It would be unlawful or would contravene a lawful direction not to provide the information to you
- We suspect the information may be used unlawfully

APP 13 If you become aware of, or believe, that any of the personal information we may hold about you is inaccurate, incomplete or outdated, you may contact us and provide to us evidence of the inaccuracy or incompleteness or outdatedness and we will, subject to agreeing that the information requires correcting, take reasonable steps to correct the information.

Should we believe that your personal information does not require correction, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled by us, that we make it apparent that the information is contested by you.