

Centrepont Alliance Limited Privacy Policy

Release Date | November 2021

Centrepoint Alliance Limited Privacy Policy

At Centrepoint Alliance Limited, we understand that the privacy of your information is important to you and we respect the confidentiality of the information that you provide to us. Protecting your information is an important part of maintaining trust between us and our clients and by handling information in a secure manner we build strong business relationships.

This document provides information and details about how we manage the personal information that we collect, hold, use and disclose about individuals.

The Centrepoint Alliance Privacy Policy applies to all organisations within Centrepoint Alliance Limited and all subsidiary companies ('the Centrepoint Group') which are set out at the end of this policy. We are bound by the Privacy Act and we manage and protect your personal information in accordance with the Australian Privacy Principles.

Why we collect and use personal information

We collect, hold, use and disclose personal information so we can provide you with financial and credit products, advice and service relevant to your needs. We may also collect, use and disclose your information for related purposes such as:

- Complying with our legal obligations, such as verifying your identity
- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Internal operations, such as record keeping, data analytics, auditing or training
- Promotion of other products and services that may be of interest to you

We also hold personal information about our shareholders. This is used to fulfil our legal obligations and to keep our shareholders informed about Centrepoint Alliance's business performance and the products and services we provide.

We collect, use, hold and sometimes disclose personal information about financial advisers, credit representatives and other people who we do business with (including employees) in order to administer and manage our business operations. This information is afforded the same standard of care as that of our clients.

What personal information we collect

We ask people for a range of personal information to assist us in providing relevant products and services. The information we collect could include (but is not limited to) your name, date of birth, contact details, financial information, employment details, residency and citizenship status. We may also collect the personal information of your family members where it is relevant to the advice being provided.

We may also collect sensitive information about your medical history and their health and lifestyle to provide financial advice about life insurance products.

In most instances, we collect personal information directly from that person when they:

- complete a financial product or credit product application form,
- complete an identification form,
- complete data collection documentation,
- interact with an online interactive tool, such as a budget planner,
- provide documentation to us, or
- when you communicate with us in person, over the telephone, fax, email, internet or by using other electronic devices.

Situations where we collect personal information from other people and organisations include (but are not limited to):

- a financial adviser,
- a mortgage broker or other credit representative,
- other professionals who act on your behalf, such as a lawyer or accountant,
- health professionals,
- other organisations, who jointly with us, provide products or services to you, and
- social media and publicly available sites.

It's your choice whether to provide your personal information. You have the right to not to provide personal information, including about your identity. However, in this case, your adviser will warn you about the possible consequences and how this may impact on the quality of the advice provided. Your adviser may also decline to provide advice if they feel they have insufficient information to proceed. In some instances, we will decline to provide services or advice if we feel we have insufficient information for the scope of the service or advice requested.

Further, in some circumstances the law requires us to obtain and verify details of photographic and non-photographic identification documents.

Cookies and other web technologies we use

Some personal information may be collected automatically, without your knowledge, whilst navigating through and interacting with the content of our websites. The electronic methods of collection we use include cookies, log files and web beacons.

Cookies are a small text or pixel file stored on your device that records information about your visit to our websites. We use cookies to improve your website experience, to serve you with relevant information and to manage your access to certain parts of our websites. You can choose if and how a cookie will be accepted by changing your browser settings; but please be aware that this may affect your access to some parts of our websites.

Web beacons are small pixel files that help us better manage content on our websites by allowing us to understand usage patterns, fix issues, and improve the products and services offered to you on our websites. Log files contain information about the devices and browsers used to access our websites and help us to diagnose problems, analyse trends, administer the site or mobile application.

The information we collect by these electronic means is generally not stored for long – they are temporary records – and can include device-specific data or log data such as your IP address, device screen size, device type, browser information, referring domain, pages visited, the date and time website pages were visited, and geographic location (country only).

Accessing and updating personal information

You can request access to personal information we hold. There may be a cost involved with locating, copying or sending you the information you request. The cost will be discussed and agreed with you at the time.

There may be circumstances where we refuse to provide you with the information you request, for example when the information is commercially sensitive. In these situations, we will inform you and provide an explanation as to why.

We will deal with requests for access to your personal information as soon as possible and aim to respond within 30 days. The time we require will depend on the type of information requested.

We will update your personal information if you contact us. In most cases, you can update your personal information over the phone, by contacting your adviser or broker or electronically.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may only be able to provide you with limited information or services. In many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

Who we share personal information with

From time to time we may share your personal information with other entities both within and outside of the Centrepont Group. This will vary according to the product or service involved, but could include:

- any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney
- financial product and service providers, including financial planning software providers and paraplanners
- for corporate superannuation members, your employer or your employer's financial adviser
- lenders and other credit providers
- other organisations within the Centrepont Group including related bodies corporate and advice firms we have authorised
- medical practitioners and health service providers, such as pathology services
- companies involved in the payments system including financial institutions, merchants and payment organisations
- organisations who assist us with certain business functions, such as auditors, compliance consultants, direct marketing, debt recovery and information and communication technology support
- our solicitors, our insurers, courts, tribunals and dispute resolution organisations
- other organisations who provide us with products and services so that they may provide their products and services to you or contact you on our behalf, and/or
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information to (for example, law enforcement agencies, Australian and international government and regulatory authorities).

We may also disclose your information to a third party where you have given your consent or where you would reasonably expect us to disclose your information to that third party.

We may also disclose the personal information we hold about our financial advisers and credit representatives to professional organisations, companies and consultants that we work with.

The only circumstances in which we would collect, use or disclose your government related identifiers is where we are required or authorised by law to do so. For example, we may be required to disclose your Tax File Number (TFN) to the Australian Taxation Office, a superannuation or retirement income product provider. Likewise, we may need to disclose your Medicare number to Centrelink in order to assess your social security eligibility. Drivers licence numbers and passport numbers may also be collected when we are required to verify your identity.

Personal information collected may also be used for direct marketing purposes to promote events, products or services that may be of relevance to you. Please contact us should you wish not to receive direct marketing.

Disclosure of personal information overseas

Some of the organisations to which we may disclose your personal information may be located outside of Australia including New Zealand, Japan, South Africa, USA, member states of the European Union, India, Vietnam, Thailand and the Philippines.

The most common example of when we share your personal information overseas is when we work with overseas service providers who prepare financial advice documents.

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place

Your adviser may enter into their own outsourcing arrangements to countries other than those detailed above. If so, your adviser will disclose these arrangements separately to you. All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act

Personal information is generally hosted on servers located in Australia. If you access our services from outside Australia, you consent to the transfer of your personal information to Australia, a jurisdiction that may not provide the same high level of protection we apply in Australia.

How we protect personal information

We strive to ensure that the personal information that you provide to us is stored safely and securely. We take a number of precautions to protect the personal information we hold about you from misuse, interference and loss, and from unauthorised access, modification or disclosure.

We have a range of practices and policies in place to protect personal information we hold, including:

- educating our staff and representatives about how to protect your personal information and updating them about cybersecurity developments, threats and scams,
- requiring our staff and representatives to use passwords when accessing our systems,
- where appropriate, using strict confidentiality arrangements restricting third parties' use or disclosure of personal information for any unauthorised purposes,
- employing physical and electronic means, including access controls (as required) to protect against unauthorised access to buildings,
- employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons, malware and viruses from entering our systems,
- some of the systems we use are on dedicated secure networks or transmit electronic data via encryption, and
- providing secure storage for physical records and securing paper files in locked cabinets and physical access restrictions.

Where personal information is no longer required, we take steps to de-identify or destroy the information in a secure manner.

Contacting us about privacy

If you have any privacy related questions or would like further information on Centrepoint Alliance privacy and information handling practices, please contact the Centrepoint Alliance Privacy Officer.

Mail Privacy Officer, Centrepoint Alliance
Level 13, Corporate Centre One
2 Corporate Court, Bundall QLD 4217

Phone 1300 557 598

Email privacy@cpal.com.au

Website www.centrepointalliance.com.au

Complaints about privacy

If you are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint, please contact the Centrepoint Alliance Claims Team on the information below:

Mail Claims Manager, Centrepoint Alliance
Level 13, Corporate Centre One
2 Corporate Court, Bundall QLD 4217

Phone 1800 653 244

Email complaints@cpal.com.au

Website www.centrepointalliance.com.au

We will acknowledge receipt of a complaint within 1 business day, however, where this is not possible, acknowledgement will be made as soon as practicable. We will then investigate the complaint and respond to you within 30 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution. If additional time is required, we will advise you in writing.

If you are not fully satisfied with our response, you can contact an external body. In cases of privacy related complaints, this is generally the **Office of the Australian Information Commissioner (OAIC)**. The contact details for OAIC are:

Mail GPO Box 5218 Sydney NSW 2001

Phone 1300 363 992

Email enquiries@oaic.gov.au

Online www.oaic.gov.au

You may also direct privacy complaints related to financial advice to the Australian Financial Complaints Authority (AFCA) The contact details for AFCA are:

Mail GPO Box 3, Melbourne VIC 3001

Phone 1800 931 678 (free of charge)

Email info@afca.org.au

Online www.afca.org.au

About this Policy

We may amend or update our Privacy Policy as required by law or as our business processes or technology changes. We will post the updated policy on our website – www.centrepoinalliance.com.au/privacy-policy/. We encourage you to check our website from time to time to view our current policy or contact us for a printed copy.

The Centrepoint Alliance Privacy Policy applies to the following organisations which are all part of the Centrepoint Group:

• Alliance Wealth Pty Ltd	ABN 93 161 647 007
• Associated Advisory Practices Pty Ltd	ABN 24 118 000 150
• Centrepoint Alliance Lending Pty Ltd	ABN 40 100 947 804
• Centrepoint Alliance Ltd	ABN 72 052 507 507
• Centrepoint Alliance Services Pty Ltd	ABN 37 101 213 816
• Centrepoint Services Pty Ltd	ABN 55 065 455 745
• Centrepoint Wealth Pty Ltd	ABN 63 074 949 429
• Clearview Financial Advice Pty Ltd	ABN 89 133 593 012
• De Run Securities Pty Ltd	ABN 52 084 086 984
• Enzumo Consulting Pty Ltd	ABN 54 603 675 636
• Enzumo Corporation Pty Ltd	ABN 19 100 876 435
• Investment Diversity Pty Ltd	ABN 21 096 137 156
• LaVista Licensee Solutions Pty Ltd	ABN 20 630 086 716
• Matrix Planning Solutions Pty Ltd	ABN 45 087 470 200
• Presidium Research and Investment Management Ltd	ABN 27 120 725 073
• Professional Accountants Pty Ltd	ABN 18 094 965 974
• Professional Investment Services Pty Ltd	ABN 11 074 608 558
• Ventura Investment Management Ltd	ABN 49 092 375 258
• Ventura Managed Account Portfolios	ARSN 601 085 410
• xseedwealth Pty Ltd	ABN 56 126 371 346

Centrepoint Alliance has a number of business partners and affiliates that have their own privacy policies. Please refer to those policies for how those organisations deal with privacy.