

PRIVACY STATEMENT

VERSION 4.1.0



PRIVACY POLICY

Who we are

'We', 'us' and 'our' refer to HNW Planning Pty Limited (ACN 083 745 055, Australian Financial Services Licence 225216 and Australian Credit Licence 225216) and our related businesses, authorised representatives and credit representatives. 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.

You may be able to deal with us without identifying yourself (i.e. anonymously or by using a pseudonym) in certain circumstances, such as when you use our website or the websites of our representatives.

By visiting our websites, using any of our services or otherwise providing us with your personal information (or authorising it to be provided to us by someone else), you agree to your personal information being handled as set out in this Privacy Policy and our [Online Privacy Policy](#), and, where appropriate, as set out in our client agreement with you.

The Privacy Policy applies to all organisations within the Licensee and all subsidiary companies 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.

Revisions to this Privacy Policy

HNW Planning may update this Privacy Policy from time to time so please review it periodically for changes.

Your continued use of our website or services, requesting our assistance or the provision of further personal information to us (directly or via an authorised person) after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

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 and professional obligations, including verifying your identity, checking for conflicts of interest, undertaking anti-money laundering checks and other client needs analysis procedures
- 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 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.

In certain circumstances we may be required or permitted by law or a Court or a Tribunal order to collect certain personal information about you. For example, we may need to collect your name, residential address, date of birth, photo identification, business name (if any), directorship appointments (if any) and to comply with Anti-Money Laundering and Counter Terrorism and Anti-Bribery and Corruption legislation (e.g. in Australia the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth)) or professional conduct and practice rules or legislation in the areas in which we operate.

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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.

The personal information we hold about you may also include credit information. This is information which is used to assess your eligibility to be provided with finance and may include any finance that you have outstanding, your repayment history in respect of those loans, and any defaults. Usually, credit information is exchanged between credit and finance providers and credit reporting bodies.

If you are applying for finance we may also collect the ages and number of your dependants and cohabitants, the length of time at your current address, your employment details and proof of earnings and expenses.

How do we collect your personal information?

We may collect your personal information in various ways, including via telephone, our website, email or hardcopy and/or online forms. In most situations we collect your personal information directly from you.

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However, we may also collect information from third parties, such as:

- your insurer
- a company in which you are a shareholder or officeholder
- your employer
- your family members, legal guardian and/or anyone you have authorised to deal with us on your behalf, and/or
- from finance brokers, financial planners and other people such as accountants and solicitors.

On all occasions, personal information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

Who do we disclose your personal information to?

Your personal information may also be confidentially disclosed to other entities. Such entities generally include:

- Credit providers or other intermediaries in relation to your finance requirements
- Credit reporting bodies
- Government bodies, regulators, law enforcement agencies and any other parties where authorised or required by law
- Our suppliers, associates, service providers or contractors involved in providing, managing, auditing or administering your finance, superannuation, insurance, investment or other services offered by us (including, for example, call centre, professional standards bodies, stationery printing houses, mail houses, insurers, information technology, secure storage and archiving services, marketing agencies, and marketing research companies etc.)
- Any person who proposes to guarantee or has guaranteed repayment of any credit provided to you
- Mortgage insurers, brokers, originators and/or managers, financial consultants, accountants, solicitors or real estate agents if you have provided consent for such disclosure
- Entities connected with funding financial credit to you by means of an arrangement involving securitisation
- Any other entities identified at the time of collecting your personal information to which we are legally required to disclose your personal information
- to your employer, referees or identity verification services
- Third parties to enable them to contact you to offer their products and services or to determine if you would be interested in the products and services; and
- Any person considering acquiring or taking an interest in our business.

This is to your benefit, and helps us to provide the products and services you would expect from us. Before we disclose any of your personal information to any other organisation, we will take reasonable steps to ensure that:

- The organisation has the same commitment as us to the protection of your personal information; and
- You have consented to us doing so.

By consent, we mean approval in writing, orally, or implied from your dealings with us.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

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- (a) the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- (b) you have consented to us making the disclosure.

Do we disclose personal information overseas?

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside Australia. Where possible our contracts with these parties generally include an obligation for them to comply with Australian privacy law and this Privacy Policy.

How do we protect personal information?

We take reasonable steps to protect any personal information that we hold from misuse, interference and loss and from unauthorised access, alteration and disclosure. For example, we implement the following security measures:

- security procedures for access to our business premises
- security procedures within our offices
- IT security procedures including password protection, firewalls, intrusion detection and site monitoring, and
- mandatory confidentiality guidelines for all staff within the business.

However, data protection measures are never completely secure and, despite the measures we have put in place, we cannot guarantee the security of your personal information. You must take care to protect your personal information (for example, by protecting any usernames and passwords). You should notify us as soon as possible if you become aware of any security breaches.

Direct marketing

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company with whom we are associated.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on 02 4365 2554 or by emailing us at compliance@hwnexus.com.au. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. We take reasonable steps to ensure that the personal information we hold about you is accurate, complete and up-to-date. However, we also rely on you to advise us of any changes to your personal information.

Please contact us using the contact details below as soon as possible if there are any changes to your personal information or if you believe the personal information we hold about you is not accurate, complete or up-to-date so that we can update our records accordingly.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

Access to your personal information

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time.

We may charge a fee for our costs of retrieving and supplying the information to you.

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Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request. We may need to consult with other entities as part of our investigation.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you if we deny you access to the personal information we hold about you.

Using government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about interest rates or current promotional offers.

How safe and secure is your personal information that we hold?

We will take reasonable steps to protect your personal information by storing it in a secure environment. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

What to do if you have a complaint?

If you wish to make a complaint about a breach of this Privacy Policy you can contact us using the details below. You will need to provide us with sufficient details regarding your complaint together with any supporting evidence.

Our Privacy Officer will investigate the issue and determine the steps (if any) that we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the outcome of the investigation.

If you are not satisfied with our determination, you can contact us to discuss your concerns, or you may make a complaint with the Privacy Commissioner at www.oaic.gov.au.

Further information

You may request further information about the way we manage your personal information by contacting us.

Contact us

If you have a query relating to this Privacy Policy or wish to make a complaint, please contact us using the following details:

The Privacy Officer
HNW Planning
PO Box 3305, ERINA NSW 2500

or email the Privacy Officer at compliance@hwnexus.com.au.

This Privacy Policy was revised as at 20 June 2023.