

Privacy Policy

Phoenix Wealth Management Pty Ltd ("PWM") is committed to protecting your privacy and the confidentiality of your personal information. As an entity that collects and maintains personal information about its clients, PWM is subject to the Privacy Act 1988 (*Cwlth*) and associated regulations, including the Australian Privacy Principles. To ensure you are appropriately informed in respect of how PWM will manage and handle your personal information PWM makes available this Privacy Policy.

A hard copy can be obtained by contacting PWM's Director (see below for contact details).

Why do we collect your personal information?

PWM collects the personal information that we believe is necessary to deliver our services or products, or otherwise for our business functions or activities. Most of this information we are required to obtain in order to satisfy legal or regulatory requirements. For instance, we are required to confirm your identity for the purposes of the Anti-Money Laundering and Counter Terrorism Financing Act.

What information do we collect?

We collect information about you when you use our products or services or deal with us. Generally speaking, the types of personal information we collect include your name, date of birth, address, telephone number, email address, financial information including your Tax File Number (if you choose to provide it), other contact or identification details and, in some cases, information necessary to make or receive payments to or from you or necessary to effect transactions in financial products on your behalf.

There may be occasions where we receive or need to source personal information about you from third parties such as:

- Credit reporting bodies (e.g., when we obtain a credit report);
- Banks and financial institutions (e.g. opinions about your creditworthiness);
- Publicly available sources of information (e.g. financial product registries);
- Your representative or agent; or
- Government agencies.

In certain limited situations, PWM may collect sensitive information from you. Sensitive information includes race, political or religious beliefs, sexual preferences, criminal convictions, membership of professional or trade associations or unions and health information. PWM generally only collects sensitive information if it is required by laws or regulation. In the event that you provide PWM with any unsolicited personal information of a kind which we would not normally collect and would not be entitled to collect, PWM will destroy or permanently de-identify this information.

Personal information about third parties

If at any time you supply us with personal information about another person, you should ensure that you are authorised to do so and you must agree to inform that person who we are, the purpose for which we will use and disclose their personal information and that they may gain access to it should we hold that information. You acknowledge that we may be required to, or wish to, contact the person whose personal information was provided in order to confirm its accuracy.

PWM will maintain the information and handle it in accordance with this Policy and applicable privacy laws.

How do we collect personal information?

Personal information about you will usually be collected by the PWM Director during face-to-face interviews and meetings, telephone calls, discussions relating to service arrangements or by means of our client account opening procedures.

You acknowledge that we may also collect personal information from your agent where they have introduced you to us or have arranged for PWM to provide certain services to you, subject to the terms of this Policy.

Use and disclosure of personal information

PWM will generally only use your personal information in relation to the provision of financial products or services to you. If considered appropriate we may also use your personal information for internal communication purposes such as sending you research and notifying you of new products and services unless you have notified us that you do not wish to receive such communications.

You authorise PWM to disclose necessary information to related companies, affiliates and any agents or contractors who provide services to us in connection with the provision

of the products or services. PWM will only enter these types of arrangements or disclose such information where we reasonably believe that the relevant party will only use your personal information for the specific purpose for which we supply it to them.

Subject to what is permitted at law, the types of third parties we may disclose your personal information may include:

- Our agents, contractors, insurers, auditors and external advisers we engage from time to time to carry out, or advise on, our functions and activities;
- Any person or organisation that introduces you to us;
- Regulatory bodies, government agencies, law enforcement bodies and courts;
- Debt collection agencies and credit reference agencies;
- Underwriters, corporate advisers or issue managers where you are applying for financial products in a corporate action, initial public offering or other new issue;
- Other product providers and financial institutions;
- Insurers and reinsurers and their claims agents and assessors; and
- Any person to the extent necessary, in our view, in order to act on the instructions you give to us.

How do we keep your information safe?

PWM stores your information in a combination of computer storage facilities, paper-based files and other records. PWM will take reasonable steps to protect your information from loss, misuse, unauthorised access or unapproved disclosure. Access to and use of personal information within PWM is appropriately limited to prevent misuse or unlawful disclosure of the information.

If other organisations provide support services, to the extent reasonably practicable, we require them to appropriately safeguard the privacy of the information provided to them.

We take reasonable steps to destroy or permanently de-identify any personal information after we no longer need to hold or use that information to deliver our services or products, for our business functions or activities or to comply with any legal or regulatory requirements.

How you can access your information

You can contact us to request access to your information. In normal circumstances, once your identity has been verified, we will give you full access to your information. However, there may be some legal or administrative reasons to deny access. If access is denied, we will provide a reason why.

The obligation to provide you access only extends to information supplied to us by you and does not extend to PWM's own records created by PWM in our dealings with you.

How you can correct your information

If you believe the personal information that PWM holds is inaccurate, incomplete or out of date and PWM agrees, the information will be amended. We will also take such steps (if any) as are reasonable in the circumstances to give notification of this correction to any third parties to whom it has been previously disclosed by PWM.

If we disagree with you about the accuracy, completeness or currency of the information, then we will inform you in writing of our reasons for this refusal (except to the extent it would be unreasonable to do so) and inform you of any appropriate complaint avenues. You should keep PWM informed of any changes to your personal information by notifying your adviser in writing. We also ask that you promptly advise us of changes to the personal information you have supplied.

Visiting PWM's website

If you visit the PWM website to browse, read or download information, our system may log these activities. These website logs are not personally identifiable and PWM makes no attempt to link them with the individuals who browse the website.

If you visit the PWM website to log into our secure areas, such as the Client Login, any personal information you access will be subject to password protection and you should not divulge your password to any other person. You should ensure that you change your password regularly. You should not access your PWM account from a shared computer. You should also avoid using a public domain email address (such as Gmail) when communicating with PWM and ensure that no 'mail rules' have been set up on your account to divert legitimate PWM correspondence. To further protect your personal information, your login time will automatically expire after a certain period.

PWM cannot guarantee or accept responsibility for the privacy practices or the content of websites to which we provide links.

Identifiers

Each PWM client account is identified by a unique client account name, which you should keep confidential. We will not adopt as an account identifier information that you may have supplied to us such as Tax File Numbers and Medicare numbers.

Complaints resolution

We are committed to providing our clients a fair and reasonable system for handling privacy issues. If you have any concerns about our privacy policy, please contact the Director in writing (see below for contact details).

We will seek to address any concerns that you may have through our complaints managing procedures, but if you wish to take matters further you may refer your concerns to the Office of the Australian Information Commissioner (“OAIC”) (website www.oaic.gov.au).

If you are not satisfied with how we manage your complaint or our decision after you’ve gone through our internal dispute resolution process, the Australian Financial Complaints Authority (“AFCA”) can consider certain privacy complaints involving financial services providers.

Contact

Email: info@phoenixwealth.com.au

Mail: The Director

Phoenix Wealth Management Pty Ltd

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