

# PRIVACY POLICY

Fitzpatricks Private Wealth Pty Ltd (Fitzpatricks), is committed to ensuring the confidentiality and security of your personal information. This Policy outlines why we need to collect personal information and how we manage the personal information we collect about individuals including customers and potential customers.

'Fitzpatricks', 'we', 'us' or 'our' refers to all companies within the Fitzpatricks Group of companies and their representatives and authorised representatives.

## Australian Privacy Principles

Fitzpatricks maintains all personal information in accordance with the Australian Privacy Principles (APP) of the Privacy Amendment (Enhancing Privacy Protection) Act 2012. We are committed to being open with you about how we use your personal information.

## Why do we collect and hold personal information

Understanding and providing solutions to your financial needs is core to the activities of our business. Fitzpatricks will collect personal information from you to provide you with products or services. It may also be used to keep you informed about our range of products and services or to invite you to social events. You can opt out of receiving marketing information from us at any time (refer to 'Queries and Complaints'). The information provided may be used to administer and manage our products and services, including for training, audit or data analytic purposes or any other purposes authorised by you.

We will collect and record information that will assist us in complying with our legal obligations including taxation and anti-money laundering and counter-terrorism financing.

## The information we may collect

As a provider of financial services, we are subject to legislative and regulatory requirements which require us to obtain and hold detailed information which personally identifies you. The type of personal information we may collect can include (but is not limited to):

- Name and address
- Date of birth
- Contact details
- Bank account details
- Tax file numbers

We may also need to collect other personal information relating to your finances, assets and liabilities, current investments, income, marital status and gender to assist us in the provision of our services to you.

## Health information

We may collect health information to enable us to provide you with financial advice, financial products and insurance services. We will only disclose this information where it is necessary to assist you in applying for financial products, or when required by law.

## Source of information

Wherever practicable, we will collect information from you personally. We may also collect your personal information from external sources, for example, from other professional advisers, or our service providers.

## Use and Disclosure of Collected Information

The personal information we hold will be used for the provision of products and services to you, including financial advice and investment management services. In some instances, it may be necessary for us to disclose your personal information to third parties outside the Fitzpatricks Group. Unless you consent to this disclosure, we will not be able to provide you with our services. The types of organisations to whom we may disclose your personal information include, but are not limited to:

- Regulators such as Australian Transaction Reports and Analysis Centre (AUSTRAC), the Australian Securities and Investments Commission (ASIC), the Australian Tax Office (ATO) and the Australian Prudential Regulation Authority (APRA)
- Financial institutions for the provision of financial products such as investments, superannuation, and life insurance
- Organisations providing mailing services, maintenance of information technology services and printing standard documents and correspondence
- Organisations providing research, technical (tax, legal, etc) or paraplanning services
- Your adviser/s
- Companies within our group
- Organisations we may contract with to provide us with a service (such as software providers)
- To any party acquiring an interest in our business
- Where the Law requires or permits us to do so.

From time to time, we may use your personal contact details to send you information that we think will be of interest to you. You may instruct us not to send this information to you by contacting us either by phone or in writing (refer to 'Queries and Complaints').

For analytical and product development purposes we may anonymise your data.

## Data Quality

It is our aim to ensure the information we hold about you is accurate, complete and up to date. If you believe at any stage the information we hold is inaccurate, or incomplete in any way, please contact us and provide evidence of the inaccuracy. If the information we hold is wrong, we will correct it.

## Accessing Collected Information

If you wish to access the personal information we hold about you, please contact us. Fitzpatricks will always ask you to identify yourself to our satisfaction and provide us with a reason for requesting the

information. We will facilitate access to the information by discussing with you how you would like to receive access to the information and what manner would be most appropriate. You may ask us to correct any information we have to your satisfaction.

## **Data Security**

The security of your personal information is important to us. Your personal information is held in a combination of secure computer-based storage facilities and lockable filing cabinets or in a secure filing room. We use security procedures and update our technology to protect your information. Access to your personal information held by us is limited to protected it from misuse, loss, unauthorised access, modification or disclosure.

If our service providers have access to your personal information, we require them to have appropriate privacy policies and procedures to adequately protect your information.

We are required by law to keep your personal information for a certain period of time. When we no longer require the information for any purpose, we will destroy by secure means or permanently de-identify the information.

## **Identifiers**

We will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers, Medicare numbers etcetera.

## **Anonymity**

The nature of financial services does not lend itself to treating clients with anonymity. For us to provide you with a financial service we require personal information about the individual for whom the service is provided.

## **Transborder Data Flows**

Fitzpatricks will not send any personal information about you overseas unless you consent, or Fitzpatricks believes that the other country has privacy laws substantially like our own, or Fitzpatricks provides the information in other circumstances giving like protection. Fitzpatricks may also store your personal information on servers based overseas or in the "cloud" or other types of networked or electronic storage.

Some of the entities we share your information with may be, or have operations, outside Australia. Your information may be stored or accessed by parties in jurisdictions including; India, Malaysia, New Zealand, Philippines, United Kingdom, United States of America.

## **Cookies**

When you visit our website, details may be recorded about your visit, such as time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and contains information enabling Fitzpatricks' website to recognise your browser. If you do not wish to permit the use of cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

## Links to Third Party Websites

Fitzpatricks website may have links to external third-party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note that third party websites are not covered by our Policy and these websites are not subject to our privacy standards and procedures.

## Your rights if you are in the EU

As provided for in the General Data Protection Regulation, you have the right to access your data; to correct or rectify your data; to delete your data subject to applicable law; to have your data processed only in accordance with applicable law; to have copies of your data to be moved to another controller; to object to our processing your data otherwise than in accordance with the law; and to withdraw any consent to our processing your data at any time. Please email [professional.standards@ftz.com.au](mailto:professional.standards@ftz.com.au) to exercise any of those rights.

## Queries and Complaints

If you require further information about our privacy policy or wish to make a complaint about possible breaches of your privacy, you should direct your complaint to the attention of the Fitzpatricks Privacy Officer via email [professional.standards@ftz.com.au](mailto:professional.standards@ftz.com.au)

Alternatively, you may contact us by phone (02) 9248 8000.

It is our intention to use our best endeavours 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 ([enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)) who may investigate the complaint further.

## Review

From time to time it may be necessary for Fitzpatricks to review this statement. Fitzpatricks reserves the right to change this Policy at any time without notification.

Last updated 14th June 2019