

Chesterfields Financial Services Pty Ltd Privacy Policy

The privacy of your personal information has always been important to us at Chesterfields Financial Services P/L. (The Company). We are bound by The Australian Privacy Principles, (NPP) set out in The Privacy Amendment (Enhancing Privacy Protection) Act 2012 that governs confidential information that you provide to us. We are committed to supporting this and any other applicable laws affecting your personal information, including the AML/CTF Act 2006.

This privacy policy outlines Chesterfields Financial Services P/L policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

Collecting Your Personal Information

Your personal information will be collected and held by Chesterfields Financial Services P/L for the purpose of providing you with the financial services you require. It will be used for the purposes of:

- Providing you with the financial services that you have requested;
- Meeting the AML/CTF identification and verification requirements;
- Managing our relationship with you(including providing up to date records)
- Contacting you about financial products and services in which you may be interested.
- Updating your records

To enable your financial adviser to provide you with financial services that are appropriate for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth, and those of your partner/dependant;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- information required under the AML/CTF Act 2006
- family circumstances and social security eligibility; and
- other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

Quality of Data

If it is reasonable and practicable we will only collect your personal information from you. Generally your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or via written material, email letter or fax. We may need to collect personal information from third parties such as your accountant. We will ask you to sign an authority to collect this data. The Corporations Act require us to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to you. If you elect not to provide this information it may affect the appropriateness and adequacy of our advice, and expose you to higher risks in respect of the recommendations made.

How Your Personal Information is Held

Your personal information is generally held in hard copy or network client files on a computer database. Your personal information may also be held in a secure archiving facility. We will take reasonable steps to ensure that the personal information that we hold is protected from misuse and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having a secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision to you of the financial services you have requested. The types of third parties that may be provided with your personal information are:

- Any other financial advisers, brokers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, broker, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer; (at your instruction)
- government authorities and other organisations when required by law; and
- other organisations that you have consented to your personal information being disclosed to.

Your personal information may also be used in connection with such purposes. We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a purpose that is related to the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or

- *in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.*
- *We may also use the information collected from you to provide you with direct marketing such as articles that may be of interest to you. Should you not wish to receive such information please advise us via the “contacting us” section of this policy.*

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles. We may also acquire information from external parties relating to the services you have authorised us to provide. (Accountant if advising on Mortgages, loans etc)

We will otherwise not transfer your personal information outside Australia or use, sell or disclose your personal information without your consent, unless permitted to do so under the Privacy Act or required to by law.

Accessing your Personal Information

You can gain access to your personal information that we hold upon request. This is subject to exceptions allowed by law. If we deny a request for access we will provide you with the reasons for this decision. To request access please contact us (see “Contacting us and Privacy Issues” below).

Correcting Your Personal Information

We endeavour to take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see “Contacting us and Privacy Issues” below) and provide us with evidence that it is not accurate, complete and up-to-date.

If we agree that the personal information requires correcting we will take all reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not doing so. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

Identifiers (Tax File numbers)

In some circumstances we are required to collect government identifiers, for example your tax file number. We will not use or disclose this information other than when required to do so by law or when consented to by you.

Sensitive Information

Without your consent for instance where information is provided by you for insurance or risk purposes, we will not collect sensitive information about you. Exceptions to this include where the information is required by law, or for the establishment exercise or defence of a legal claim.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us by contacting us on 08 9486 8226.

If you wish to complain about any breach or potential breach of the privacy policy or the Australian Privacy Principles, You should contact the Complaints Manager at Chesterfields. You may also contact the Office of the Australian Information Commissioner who may investigate your concern further.

Disclaimer

In providing financial services to you, we have relied on information supplied to us, which, where reasonable, we have assumed to be correct. Whilst all reasonable efforts have been made to substantiate such information, no responsibility can be accepted if the Information is incorrect or inaccurate.