



PRIVACY POLICY

Date created – 20 May 2019

When you trust us with your personal information, you expect us to protect it and keep it safe.

We are bound by the *Privacy Act 1988* (Cth) ('Privacy Act') and will protect your personal information in accordance with the *Australian Privacy Principles*. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

ABOUT THIS POLICY

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

WHAT IS PERSONAL INFORMATION?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

When you engage our services, we may ask for identification information. This information could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. If you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Throughout our engagement, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION?

The main reason we collect, use, hold and disclose personal information is to provide you with our advisory services. This includes:

- checking whether you are eligible for the product or service;
- assisting you where online applications are not completed;
- providing the product or service; and
- helping manage the product or service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

HOW DO WE COLLECT PERSONAL INFORMATION?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or if you send us electronic correspondence (see "Do we collect personal information electronically?").

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

WHAT LAWS REQUIRE OR AUTHORISE US TO COLLECT PERSONAL INFORMATION?

We are required or authorised to collect:

- certain identification information about you by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and *Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)*;
- your Tax File Number, if you choose to provide it, by the *Income Tax Assessment Act 1936 (Cth)*; and
- certain information in relation to your application if you have applied for an insurance as required by the *Insurance Contracts Act 1984 (Cth)*.

HOW DO WE HOLD PERSONAL INFORMATION?

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia and owned by us or external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may provide personal information about our clients to organisations outside UNICA Wealth Pty Ltd (UNICA Wealth). To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- paraplanning service providers;
- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments);
- other organisations, who jointly with us, provide products or services to you;
- financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;

- debt collectors;
- our, legal advisers or auditors;
- your representatives (including your legal adviser, accountant, mortgage broker, , executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- IT Service Providers;
- Our Licensee, Sterling Private Pty Ltd ("Sterling") and their related entities;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside UNICA Wealth where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

DO WE USE OR DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We may use your personal information to offer you services we believe may be relevant to you.

We do not provide your personal information to marketing companies for the purpose of promoting our services or services of another companies. If we believe that another company can provide relevant services to you, we will discuss this with you and provide an introduction upon your approval.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information, however we are always happy to discuss this with you at the time.

RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS – YOUR RIGHTS

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

The Financial Ombudsman Service (FOS) can consider most privacy complaints involving providers of financial services. FOS can be contacted at:

Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001
Phone: 1300 78 08 08
www.fos.org.au

Under the *Privacy Act* you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information. The Commissioner can be contacted at:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
www.oaic.gov.au

CONTACT US

You can contact us by:

- calling (03) 6294 0000
- emailing info@unicawealth.com.au
- visiting www.unicawealth.com.au
- writing to us at UNICA Wealth, Level 1, 160 Collins St, Hobart, TAS, 7000

CHANGES TO THE PRIVACY POLICY

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on www.unicawealth.com.au or by calling us on (03) 6294 0000

MEANING OF WORDS

We, us or our means:

- UNICA Wealth Pty Ltd (ABN 14 602 564 509)
- Sterling means Sterling Private Pty Ltd (ABN 40 120 395 904) and its related entities.