

Privacy Policy

AUSTRALIAN PRIVACY PRINCIPLES

Arrow Financial Advice Pty Ltd (Arrow Financial Advice) abides by the Australian Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act, 2012.

Information Collected As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you.

On collecting information in the referral or engagement process, the organisation collecting the information becomes obliged to provide certain disclosures to the individual whose information is being collected and also become subject to certain obligations in respect of the subsequent use, disclosure and management of that information.

Failure to provide the personal information may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

As we are required pursuant to the Corporations Act (2001) to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with personal information, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally, collection of your personal information will be effected in either face to face interviews, over the telephone or via online means. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested, which may include:

- The preparation of your financial plan;
- The provision of financial planning advice to you;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- Other activities as directed by you.

The kinds of personal information required to be collected will depend upon the financial services and scope of personal financial advice provided, but may include the following;

- Date of birth, address and contact information;
- Copy of valid identification documents;
- Personal goals and objectives;
- Income and expenses;
- Details of existing financial products, if held.

USE AND DISCLOSURE OF INFORMATION COLLECTED

We will not use or disclose personal information collected by us for any purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonable expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. We may also be required by other regulators (such as the Privacy Commissioner) to provide records held. Each regulator is empowered under specific legislation to enable

enforcement and monitoring to occur; it would be under the relevant legislation that we would need to comply and provide the regulator with records held.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to the recommendations made by us and or complete transaction requests.

To ensure that records are maintained as required, we and our Authorised Representatives may backup electronic records. Some methods of remote storage include holding information in overseas locations. In addition Product Providers such as those detailed above may also have similar data protection policies. Please refer to their Australian Privacy Principles Privacy Policy for further details.

We may disclose your personal information to another financial planner during periods when this office is unmanned or closed so that you can be assured of receiving a continued service.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any agent or representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

In the event that a Authorised Representative of Arrow Financial Advice ceases to act on behalf of Arrow Financial Advice and moves to another Dealer Group, your personal information will be retained by Arrow Financial Advice and may also be retained by the Authorised Representative who will act under the new Dealer Group. Arrow Financial Advice will notify all clients affected by such a transfer. In providing bulk notifications to clients such as this, Arrow Financial Advice may

provide an external mailhouse with client details required to send the notification on our behalf.

We may disclose your personal information to external contractors for the following purposes:

- Strategy development
- Compliance monitoring

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor to whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

DATA QUALITY

Arrow Financial Advice will take reasonable steps to ensure that the personal information it collects, uses or discloses is accurate, complete and up to date.

DATA SECURITY

Your personal information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in a secure location and where practical are stored in lockable filing cabinets. In the event you cease to be a client of this organisation, any personal information which we

hold about you will be securely maintained for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

ACCESS TO INFORMATION COLLECTED

You may at any time, by contacting us request access to your personal information and we may provide you with access to that information. However, there are limited circumstances in which access to an individual's personal information will be allowed.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

If access to information is denied, Arrow Financial Advice will provide reasons for the denial. All requests for access will be acknowledged within 14 days.

CORRECTION OF INFORMATION

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. Therefore, you are encouraged to contact us and advise of any change in your personal circumstances that may affect your dealings with Arrow Financial Advice.

COMPLAINTS

Arrow Financial Advice has in place facilities to properly consider and deal with any enquiries or complaints if you believe the privacy of your personal information has been compromised. Arrow Financial Advice will respond to all complaints within seven days and aim to have them resolved within 45 days where possible. Where this is not possible, you will be contacted and advised when it is likely that your complaint will be resolved.

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 Privacy Commissioner who may investigate your complaint further.

WEBSITE

We do not use cookies on our website. Our website contains links to other websites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.