



# **Privacy Policy**

### **Privacy Statement**

At Ethinvest Pty. Ltd. we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth). This Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

#### Information Collection

#### What information do we collect and how do we use it?

When we provide and implement financial advice, we ask you for the information we need to assess your financial situation, needs and objectives, formulate a strategy, and subsequently facilitate the strategy should you choose to proceed. This can include a broad range of information ranging from your name, address, contact details and age to other information about your personal affairs including details about health and wellbeing, assets, liabilities, insurances, tax file numbers, estate planning issues and any other information we feel may be critical to the development of financial advice tailored to your situation.

The information you provide to us may be passed on to other organisations so they may fulfil their part in the process. For example we may provide your personal details to an insurance company to obtain an accurate premium quote; or we may provide your personal details, including bank account details and tax file number, to a managed investment provider so they can establish an account in your name. We also provide your details to entities such as banks, brokers and our client management software provider where required as part of our implementation and/or management of your affairs. We do NOT provide information to third parties for anything other than the facilitation of our advice approved by you.

We also use your information to enable us to manage your ongoing requirements and our relationship with you, e.g. ensuring your investments remain in line with your needs and goals, or in

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the case of a super fund ensuring that it remains compliant with legislation. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

From time to time we will use your contact details to send you offers, updates, events, articles, newsletters or other information about products and services that we believe will be of interest or relevance to you. We may also send you regular updates by email or by post. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

We may also use your information internally to help us improve our services and help resolve any problems.

## What if you don't provide some information to us?

If you do not provide us with some or all of the information that we ask for, we may not be able to provide you with relevant advice.

## How do we hold and protect your information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you in secure electronic storage, and occasionally as hard-copy in locked storage. In some cases, your file may be archived and sent to an external data storage provider for a period of time. We only use storage providers in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by using encrypted, password protected electronic systems, hardware based electronic security equipment, and through restricting access to staff that require your information to fulfil their duties on your behalf. We maintain physical security over our paper and electronic data and premises by using locks and security systems.

#### Web Data

The following applies to the use of our website – www.ethinvest.com.au.

**Anonymous data** – We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address,

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the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

**Cookies** – In order to collect this anonymous data we use "cookies". Cookies are small pieces of information which are sent to your browser and stored on your computer's hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

There are links on our website which take you to external websites. You will need to look at the privacy policies of those websites for information on how and what data they use and collect.

## Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others. As detailed previously we will only disclose your information to service providers that are part of the process in facilitating the establishment, implementation and management of our financial advice. This includes contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers, client management service providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may also provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

We may disclose your information to recipients in overseas countries for the purpose of any direct investment in overseas assets – but only if the financial advice approved by you includes direct overseas investment. If the organisations are not regulated by laws which protect your information in a way that is similar to the Privacy Act, we will seek your consent before disclosing your information to them.

# How can you check, update or change the information we are holding?

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also

correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please write to Ethinvest at PO Box 692, Chatswood NSW 2057 or by email to info@ethinvest.com.au or by phone on (02) 9413 9558.

We do not charge for receiving a request for access to personal information or for complying with a correction request. We may charge reasonable expenses incurred in providing access to personal information where you require us to reconstruct data on the basis that you are unable source particular information externally and you require us to source this information for you.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

## How long will we keep your information?

We may be legally required to maintain some of your records for significant periods of time. However, once we believe information is no longer needed we may remove any identifying details or destroy the records entirely.

## What happens if you want to complain?

If you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to Ethinvest at PO Box 692, Chatswood NSW 2057 or by email to info@ethinvest.com.au or by phone on (02) 9413 9558.

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 45 days of you making the complaint.