



# PRIVACY STATEMENT

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Steven Bemrose Version - 1.0.0





## PRIVACY CODE

1. HNW Planning Pty Ltd abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001. A summary of the National Privacy Principles is available on our website or by contacting our office.
2. 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 ("personal information"). 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, including:
  - Employment details and employment history;
  - Details of your financial needs and objectives;
  - Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
  - Details of your investment preferences and aversion or tolerance to risk;
  - Information about your employment history, employment circumstances, family commitments and social security eligibility;
  - Details of your personal, investment and business objectives in the near and longer terms
3. Failure to provide the personal information referred to above 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.
4. As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia 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 the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.
5. 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.
6. Generally collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.
7. 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 including:
  - The preparation of your financial plan;
  - The provision of financial planning advice to you as requested by you or from time to time as we believe appropriate;
  - Making securities and investment recommendations;
  - Reviewing your financial plan;
  - Reviewing your circumstance as it may vary over time;
  - Reviewing securities and investment recommendations;
  - The potential dissemination of information to a new Financial Services Licence in the event a representative changes to such a new licence in accordance to terms of his/her employment.

## PRIVACY CODE (cont)

8. 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 reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the National 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.

9. We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

10. 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 2 weeks for your request to be actioned.

11. We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

12. In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or 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 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.

13. 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 affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

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

15. 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. HNW Planning Pty Ltd • Australian Financial Services Licensee 225216

16. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained for a period of 7 years in order to comply with legislative and professional requirements, following which time the information may be destroyed. Such information will likely be stored in an electronic format.

17. You may at any time, by contacting us, request access to your personal information and we will reasonably provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

## PRIVACY CODE (cont.)

18. We will endeavour to ensure that, at all times, the personal information about you, which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or outdatedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

19. If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

20. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

21. If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact your adviser by any of the methods detailed below. Your complaint will be considered within 7 days and responded to. 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 our Compliance Manager directly, or the Office of the Privacy Commissioner who may investigate your complaint further.

### CONTACT DETAILS

Adviser: Steven Bemrose

Phone: 1300 340 060

Fax: 02 8003 9869

Email: [steve@smefinancialservices.com.au](mailto:steve@smefinancialservices.com.au)

### ADVISER ADDRESS

Platinum Building Suite 3.11

4 Ilya Ave

Erina NSW 2250

### CORPORATE AUTHORISED REPRESENTATIVE

SME Financial Services Group Pty Ltd <ATF The Sanctuary Trust>

Platinum Building Suite 3.11  
4 Ilya Ave

Erina NSW 2250

Phone: 1300 340 060

Fax: 02 8003 9869

Email: [steve@smefinancialservices.com.au](mailto:steve@smefinancialservices.com.au)

### CONTACT DETAILS (If not satisfied with the response of your adviser)

Compliance Manager: Bradley Turns

HNW Planning Pty Ltd

ABN: 42 083 745 055

Australian Financial Services Licence No: 225216

Email: [info@hnwplanning.com.au](mailto:info@hnwplanning.com.au)

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This Privacy Statement was last reviewed and modified on Thursday 29 March 2012.