

Privacy Policy

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1 Overview

Protecting our clients' privacy is very important to us. To ensure our compliance with the Privacy Act and as part of our commitment to ensuring the safety of your private and confidential information, we have established and implemented this Policy.

1.1 Introduction

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles (APPs), which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations like us in the private sector.

1.2 Policy Statement

The Policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the APPs.

1.3 Scope and Application of the Policy

Hazelwood Hall Pty Ltd, its subsidiaries and associates are referred to in the Policy as "HWH Pty Ltd", "us", "our", or "we".

This Policy applies to HWH Pty Ltd business activities carried on in Australia. In the event of any inconsistencies between the Policy requirements and HWH Pty Ltd 's statutory duties under Australian law, the latter shall prevail.

2 Definitions and Key Concepts

Australian law means an Act of the Commonwealth or of a State or Territory or regulations, or any other instrument, made under such an Act.

Australian Privacy Principle or APP means the Australian Privacy Principles set out in Schedule 1 of the Privacy Act.

Breach means an act or practice which is contrary to or inconsistent with the Privacy Act, including an APP.

Collect means to collect personal information, usually for inclusion in a record.

Consent means express consent or implied consent.

Health information means personal information about the health of an individual, an individual's expressed wishes about the future provision of health services to the individual, or a health service to be provided to an individual.

Holds means possession or control of a record that contains personal information.

Individual means a natural person.

Overseas recipient means a person who receives personal information us who is not in Australia or an external Territory, not us or a subsidiary or associate of us, and not the individual to whom the personal information relates.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- (a) whether the information or opinion is true or not; and
- (b) whether the information or opinion is recorded in a material form or not.

Policy means this Privacy Policy.

Privacy Act means the *Privacy Act 1988* (Cth).

Privacy Officer means the HWH Pty Ltd privacy officer, responsible for managing the business impacts of privacy laws and policies across the HWH Pty Ltd entities. Refer to section 4 of this Policy for contact details.

Reasonable Steps means the actions or efforts we undertake to comply with the Privacy Act and the APPs, which must be objectively reasonable in the circumstances.

Sensitive information means personal information about an individual's:

- racial or ethnic origin
- political, philosophical or religious beliefs or opinions
- memberships or affiliations
- sexual preferences or practices
- criminal record
- health or genetic information
- biometric information.

Solicit means to request personal information, or anything that includes personal information, from someone other than the individual.

Tax file number or TFN means a tax file number as defined in Part VA of the *Income Tax Assessment Act 1936* (Cth).

Trevor W Emmett & Associates means a registered business name of HWH Pty Ltd.

Use means to handle, manage, or undertake an activity with personal information in our effective control.

3. General Obligations

3.1 Collection

3.1.1 What information do we collect?

We will collect and hold your personal information for the purposes of:

- providing advice, products and services to you
- managing and administering the products and services
- letting you know about our other products and services

The type of information collected from you includes information that is necessary to operate your account or for us to provide advice to you. We may ask you to provide personal information such as your:

- name
- e-mail address
- residential and/or postal address
- date of birth
- telephone number

- occupation
- bank account details
- financial details
- employer
- tax file number (TFN).

This information is collected from application forms you have completed, your use of our online facilities or through ongoing communications with you.

We will not solicit any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. Third parties that we may need to collect information from include your financial adviser, product issuer, employer, accountant or solicitor.

There are specific circumstances in which we will ask for your consent to provide sensitive information such as:

- personal health information from you when you apply for insurance or from medical practitioners when you make a claim,
- income information from employers when you apply for additional insurance protection or salary
- continuance insurance
- details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993* {Cth}, to pay benefits in the event of your death.

We will inform you of any legal requirements for us to ask for information about you and the consequences of not giving us that requested information. For example, in addition to the personal information we will obtain from you, whenever you acquire a new product or service from us, we will require documents evidencing your identity. Such evidence may include a certified copy of your driver's licence, passport or birth certificate.

3.1.2 *What if you do not give us the information we request?*

You are not obligated to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or delay the processing of your application or claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact the taxation treatment of your account

For example, we are required to ask for your TFN when you become a member of one of our superannuation products. If you choose to not give us your TFN, you may be subject to higher tax charges on your superannuation and we may not be able to accept personal contributions.

3.2 *Use of information*

3.2.1 *How do we use the information that we collect from you?*

We use your personal information for the purpose for which it has been obtained. We collect your personal information so that we are able to act on your request, such as to:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits,
- report the investment performance of your account
- keep you up to date on other products and services offered by us

3.3 *Disclosure*

3.3.1 *Who do we give your information to?*

We may provide your information to other related companies within HWH Pty Ltd or external parties. Where personal information is disclosed, there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we may disclose your personal information include:

- organisations involved in providing, managing or administering our products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers, or mail houses,
- your financial advisor
- your employer (relates only to employer sponsored superannuation arrangements)
- funds {administrators or trustees) to which your benefit is to be transferred or rolled over
- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or any other person who may be entitled to receive your death benefit, or any person contacted to assist us to process that benefit
- financial institutions that hold accounts for you
- professional advisers appointed by us
- businesses that may have referred you to us {for example your Credit Union).

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

We will also disclose your information if you give your consent.

3.3.2 Will my information be disclosed overseas?

It is generally unlikely that we will disclose your personal information overseas. However, we may occasionally use third-party service providers or offshore outsourcing services to provide services to you. Depending on the circumstances, the relevant countries will vary such that it is not practicable to list them here. Any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient complies with the APPs. Where we may be transferring your personal information overseas, we will either inform you and seek your consent to the arrangement, or ensure that appropriate contractual measures are in place requiring the overseas entity to protect your personal information in accordance with our obligations under Australian privacy law.

3.4 Access and correction of information

3.4.1 Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested.

If you wish to access or correct your personal information, you may contact us through our offices or by writing to the Privacy Officer, whose contact details are set out in section 4 below.

3.5 Protection of the personal and sensitive information that we hold

3.5.1 How do we protect the security of your information

We have security systems, practices and procedures in place to safeguard your privacy. We may use cloud storage or third party servers to store the personal information we hold about you. These services are subject to regular audit and the people who handle your personal information have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

If you use the secure adviser, member or employer sections of our websites, we will verify your identity by your username and password. Once verified, you will have access to secured content.

3.4.2 Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact our Customer Service team. Refer to section 4 for our Customer Service contact details.

3.5.3 Cookies

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

3.6 Retention of your personal information

We are required by law to retain certain records of information for varying lengths of time and, in certain circumstances, permanently. Where your information is not required to be

retained under law, we will take reasonable steps to irrevocably destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

3.7 Notifiable Data Breaches

The Notifiable Data Breaches (NDB) Scheme under Part 111C of the Privacy Act 1988, established requirements for entities to respond to data breaches. Entities have data breach notification obligations when a data breach is likely to result in serious harm to any individuals whose personal information is involved in the breach.

The NDB Scheme introduced an obligation to notify individuals whose personal information is involved in a data breach. This notification must include recommendations about the steps individuals should take in response to the breach. The Australian Information Commissioner must also be notified of the eligible data breaches.

4 Roles and Responsibilities

The HWH Pty Ltd Board is ultimately responsible for overseeing the Policy.

The Privacy Officer is responsible for updating this Policy and for managing the business impacts of privacy laws and policies across the HWH Pty Ltd entities.

4.1 Contacting the Privacy Officer or Customer Service

You can contact the Privacy Officer by:

Mail: Privacy Officer
Hazelwood Hall Pty Ltd
17 Britten St,
Glen Iris VIC 3146

Or by email: admin@hazelwoodhall.com.au.

You can contact the Customer Service Department by telephoning **03 9885 3639**

4.2 Complaints

If you believe that we have breached the APPs by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out in section 4.1 above.

The Privacy Officer will respond to your complaint within 30 days of its receipt

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner.

You can lodge a written complaint with the Information Commissioner by:

- submitting an online or hard copy form which may be accessed through the Information Commissioner's website at www.oaic.gov.au or obtained from <https://forms.business.gov.au/aba/oaic/privacy-complaint-1>
- fax to 02 9284 9666
- email at enquiries@oaic.gov.au

5 Policy governance

5.1 Review and approval

Unless required earlier, this Policy is reviewed and updated annually by the Privacy Officer.

Material amendments to this Policy must be approved by the HWH Pty Ltd Board. Non-material amendments to the Policy may be approved by the Managing Director.

The most current version of the Policy is dated **10th September 2017**.

5.2 Policy Owner

This policy is owned by Hazelwood Hall Pty Ltd and cover all it entities being its registered business name Trevor W Emmett & Associates and its employees.

Questions about this policy should be directed to the Privacy Officer or to Customer Service. Refer to section 4 of this Policy for contact details.