

ISSUED BY: AKUMIN PTY LTD
ABN: 34 679 707 487

ADDRESS: AURORA PLACE, LEVEL 6, 88 PHILLIP STREET SYDNEY NSW 2000

PHONE: (02) 9904 2792

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INTRODUCTION

Akumin Pty Ltd is a subsidiary of Entireti Ltd, which operates a corporate group that specialises in licensing and advice business services to financial planning and finance broking practices and their clients.

At Akumin Pty Ltd ('Akumin'), we take our obligations under the Commonwealth Privacy Act ('Privacy Act') very seriously to protect your personal information. Under the Privacy Act, we are bound by the Australian Privacy Principles, and in this Privacy Policy, we describe how we intend to meet our privacy obligations.

The Akumin Privacy Policy applies to Akumin and its related bodies corporate, including the following organisations ('collectively, the Akumin Group'):

- Akumin Financial Planning Pty Ltd (ABN: 89 051 208 327)
- Hillross Financial Services Ltd (ABN: 77 003 323 055)
- Charter Financial Planning Ltd (ABN: 35 002 976 294)
- Jigsaw Support Services Pty Ltd (ABN: 21 005 799 977)

It also applies to practices who obtain services from the Akumin Group ('Principal Practices') including Authorised Representatives and Authorised Credit Representatives ('Representatives').

References to "our", "we", and "us" refer to the Akumin Group and our Representatives collectively.

PERSONAL INFORMATION

The Privacy Act sets out the information that it protects.

Personal information generally means information or an opinion about a person, where the person is identified or is reasonably identifiable.

Sensitive information means a person's health information, genetic information, certain biometric information and biometric templates. It also means certain personal information, being an opinion about a person's:

- racial or ethnic origin;
- political opinions;
- membership of a political association;
- religious beliefs or affiliations;
- philosophical beliefs;
- membership of a professional or trade association;
- membership of a trade union;
- sexual orientation or practices; or
- criminal record.

Where in this Privacy Policy we refer to personal information, unless the context requires otherwise that is a reference to both personal information and sensitive information.

PERSONAL INFORMATION COLLECTED AND HELD

We only collect and hold personal information that is relevant to, and reasonably necessary for, the services provided to you. In addition, we only collect sensitive information if you consent, or in specific circumstances set down in the Australian Privacy Principles.

The kind of information we will be likely to collect, and hold includes your name, address and contact details, tax file number, personal medical information, your date of birth and details about your financial circumstances, goals and strategies.

CONSEQUENCES OF NOT PROVIDING YOUR PERSONAL INFORMATION

You are not obliged to provide your personal information. However, if you decide not to give information needed to provide you with services, you may not be able to receive those services.

HOW YOUR PERSONAL INFORMATION COLLECTED AND HELD

We must collect personal information only by lawful and fair means. We will usually only collect your personal information directly from you, for example, in discussion with you, when you complete forms, or via email. We may collect your personal information from another person if you consent, if we are required or allowed by law to do so, or if it would be unreasonable or impracticable for us to have to collect it from you.

For example, it may be necessary to collect personal details from third parties, such as issuers or operators of financial products or financial services. However, we will endeavour to collect such information directly from you wherever practicable.

Given the nature of the services we provide, it may be necessary to collect information about third parties related to you, such as family members, in which case we assume you have their consent.

We may also receive your information by way of a referral from a third party so you can receive a service from us.

When we collect personal information about you, we will tell you why it is being collected, the organisations, or the types of organisations, to whom we usually disclose that kind of information, any law that requires the information to be collected, and the main consequences for you if the information (or part of the information) is not provided. We will also give you our contact details and tell you about how you can access the information.

The information we collect is stored electronically within Australia and the United States of America on secure servers and in financial planning related software. Our Representatives may also maintain hard copy files containing your information. All hard copy files are either stored in secure offices or destroyed securely.

Representatives may have bespoke arrangements which will be disclosed to you in documents such as letters of engagement, forms and/or their Financial Services and Credit Guide.

We will hold your personal information for the period necessary to provide services to you, and in accordance with our statutory obligations.

HOW YOUR PERSONAL INFORMATION IS USED AND DISCLOSED

Personal information is primarily collected so our Representatives can provide you with services you request. This is known as the “primary purpose” for collecting and holding personal information. The Akumin Group provides business and compliance related services to Representatives and will have access to and use your information as necessary to provide those services. For example, the Akumin Group provides Representatives with access to financial planning software where personal information is stored.

The Akumin Group may receive personal information if you are seeking a referral for services we provide, in which case we will give your details to the Representative.

We cannot use or disclose your personal information for any secondary purposes unless certain circumstances apply. We can use or disclose personal information for a secondary purpose where you give us your consent to do so, or where:

- the secondary purpose is related to the primary purpose (where the information is sensitive information, it must be directly related to the primary purpose); and
- you would reasonably expect us to use or disclose the information for the secondary purpose.

The types of secondary purposes for which we would ordinarily use or disclose your personal information include contacting you regarding other services that we believe may be of interest to you.

We may also use or disclose information where such use or disclosure is permitted by the Australian Privacy Principles. For example, where reasonably necessary to deal with unlawful activity or serious threats to life, health or safety.

Some primary and secondary purposes will require disclosure of your personal information to third parties. Some examples of when this would be required include for the purpose of providing you with services. The likely recipients would be the issuers or operators of financial products or financial services and providers of office and related services to us. We will require that any third parties to whom we disclose personal information will only use that information for the purposes for which we disclosed it to them and on the basis that they will comply with their privacy obligations.

In addition, the Akumin Group utilises the services of contractors, who are in the Philippines and India. From time to time, we may utilise services of third parties who are in other overseas countries.

Representatives may also disclose your personal information to overseas recipients not listed above to access their services, such as paraplanning or administration. If this is the case, the Representative will provide you with details, including the relevant countries and will only share your information if you consent. The Akumin Group has made reasonable steps to ensure that overseas recipients keep your personal information secure in accordance with the Privacy Act.

We may also use artificial intelligence (AI) powered tools as part of the services it provides to you. Where this is the case, we ensure that we meet our guiding principles of AI in respect to data security especially where client data may be present. Generally, the AI tools utilised by us do not hold or store client data permanently, but instead client data may be accessed temporarily and held in secure approved data centre whilst being processed. Further information can be provided to you upon request.

If your Representative moves to another Australian Financial Services Licensee (AFSL), we may provide your personal information to the other AFSL to enable your Representative to continue providing you with services. Similarly, if your Representative sells their business to another financial adviser or AFSL we may provide your personal information to them to enable them to provide you with services. In the event of either of these things occurring, we will notify you in advance and you will have the ability to opt out of this transition.

DATA QUALITY AND PROTECTION

We will take reasonable steps:

- to make sure all personal information we collect is accurate, complete and up-to-date at all times;
- to make sure all personal information we use or disclose is (having regard to the purpose of the use or disclosure) accurate, complete up-to-date and relevant at all times.

We will also take reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification and disclosure. Once your personal information is no longer required by us, we will take reasonable steps to destroy or permanently de-identify that personal information, except in circumstances where we are required by law to retain it.

ACCESS AND CORRECTION

If you think the personal information that we hold about you is not accurate, complete or up-to-date, you should let us know. We recommend you contact our Representative in the first instance. Also, please let us know any relevant changes to your personal circumstances as soon as possible.

We will take reasonable steps to correct information where you provide sufficient evidence or we are otherwise satisfied, having regard for the purpose for which the information is held, that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will also notify the correction to other parties to whom we have previously disclosed the information and if such a party refuses to make a correction, we will notify you of that refusal and how you can make a complaint.

If you require access to personal information we hold about you, please also contact our Representative in the first instance. We will generally allow access, unless certain exceptions apply under the Australian Privacy Principles – for example, if we reasonably consider providing access would pose a serious threat to the life, health or safety of any person, or providing access would be likely to prejudice action being taken by an enforcement body, or providing access would be unlawful.

Your request should specify the information to which you require access or which you wish to be corrected. We will keep a record of your request for and the manner in which it was dealt with.

We will not charge you for requesting access to, or correction of, your personal information. We may, however, charge you the costs associated with meeting your request for access, for example photocopying and postage costs.

We are required to respond to your request for access or correction within a reasonable period, of receipt of your request.

We will provide you with access in the manner you request, if it is reasonable and practicable to do so. If we cannot meet your request for access or correction, we will notify you by email and where reasonable we will give you our reason and take steps to provide you with access. We will also tell you about how you can complain about our decision.

ANONYMITY

You can contact us anonymously or by using a pseudonym. However, being unable to identify you will limit the services we can provide you and there may be specific cases where we are prevented by law from dealing with you unless we identify you.

DATA BREACH

Should a data breach occur, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) of the data breaches that are likely to result in serious harm within 30 days of the breach event.

The factors which might contribute to a reasonable person thinking “serious harm” might have occurred include:

- The sensitivity of the information;
- Whether the information was encrypted;
- Whether the information was in a secure file;
- How likely it is that the security could be breached; or
- The identity of the person who obtained the information, whether they intend to cause harm to the affected person and the nature of the harm.

COMPLAINTS AND FURTHER INFORMATION

If you would like further information about how we handle your personal information, please send us an email to info@akumin.com.au.

If you wish to make a complaint in relation to privacy, including a breach of the Australian Privacy Principles, you can let us know by putting your concerns in writing or by calling us. You can contact us at:

Complaints Officer (Akumin)

PO Box R1872

Royal Exchange NSW 1225

By email at complaints@akumin.com.au or by calling 1800 812 388.

We will investigate your complaint and respond to your concerns as quickly as possible and within 30 days.