

## Privacy Policy

As an accounting and investment advisory firm, we are subject to certain legislative and regulatory requirements that necessitate us obtaining and holding detailed information that personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive 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;
- Other information such as family commitments and social security eligibility.

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.

As we are required pursuant to the Corporations Act 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 discontinue our association with you, or not proceed to provide you with advice, 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 by way of an information collection questionnaire. 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 that you have requested including:

- The provision of financial advice to you;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- Provision of superannuation and taxation services and advice.

Except for retaining information received for the purposes detailed above, we will destroy or de-identify any unsolicited personal information received about you.

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 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 are obliged, pursuant to the Corporations Act, to maintain certain transaction records and make those records available for inspection by ASIC.

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 by any of the methods detailed overleaf, request not to receive such information and we will give effect to that request. We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to the advice and recommendations made by us.

In order to ensure that you receive a personal and tailored service, your personal information may be transferred to other employees of the organisation. It is a condition of our agreement with each of our employees that they adopt and adhere to this privacy policy. If you have any concerns in this regard, you should contact us by any of the methods detailed overleaf.

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

- Audit and accounting of self managed superannuation funds;
- Obtaining legal advice and/or accounting advice at your request;
- Seeking share recommendations from a stockbroker on your behalf;
- Obtaining life insurance or life insurance products on your behalf;
- Discussing issues with your accountant.

Except for reasons listed above, we will not disclose personal information to overseas recipients. We will take reasonable measures to ensure that overseas recipients do not breach Australian Privacy Principles.

Furthermore, your personal information will be maintained on a secure website. This facility has been chosen after extensive due diligence. As such, information may be accessible by a controlled number of individuals who are responsible for running the website. Strict controls are in place to restrict access to such information.

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. 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 files stored within our business premises which are protected by locks and a password system. Access to our premises is controlled by allowing only personnel with knowledge of the password access the premises at any time. All computer based information is protected through the use of passwords on each computer. Data is also held offsite on a secure website and backed up daily.

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 will be destroyed.

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) 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. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information that would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result. We will not provide you 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.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal. We will endeavour to ensure that, at all times, the personal information about you that we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information that 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 and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

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

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. 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 the Office of the Australian Information Commissioner who may investigate your complaint further. MKS Wealth Management abides by the National Privacy Principles established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012. A copy of the Australian Privacy Principles is available by contacting our office or visiting the Australian Information Commissioner's website.

You can contact our Privacy Officer, Matthew Smith by:

**Telephone:** (03) 9899 2671  
**Email:** contact@mkswealth.com.au  
**Mail:** PO Box 385, Mont Albert, VIC 3127