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## SOVEREIGN PRIVACY POLICY

At Sovereign Financial Group, we are committed to protecting your privacy in accordance with *the Privacy Act 1988* (Cth) (**Privacy Act**). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

### What personal information do we collect and hold?

The types of personal information we collect from you depends on the circumstances in which the information is collected.

When we engage you as a Financial Services client, we ask you for the information we need to provide personal financial advice and implement appropriate investment recommendations. We collect your information through our Client Fact Find. This can include a broad range of information from your name, address, contact details and age to information about your personal affairs including marital status, details of your dependents etc.

We may also collect your information from our related entities being Sovereign Taxation Pty Ltd and Sovereign Lending Pty Ltd.

If you apply for employment with us, we may also collect information for the purpose of considering your application, including your qualifications and resumé as well as reference information from your nominated referees. If you are employed by us, we may collect additional information for employment-related purposes.

If you are an individual contractor to us, we may also collect information relevant to your engagement with us including your qualifications, work history, resumé, reference information from your nominated referees, bank details, feedback from supervisors and training records.

We only collect sensitive information such as country of birth, nationality with your consent and generally only if it is necessary for us to do so (including to provide to fund managers for their AML/CTF obligations). If you do provide us with sensitive information for any reason, you consent to us collecting that information and using and disclosing it for the purpose we collected it, or as permitted by the Privacy Act and other relevant laws.

In addition, we may also collect personal information as otherwise permitted or required by law.

### **How do we collect your personal information?**

We collect personal information in a number of ways. The most common ways we collect your personal information are:

- directly from you when you provide it to us or our agents or contractors (for example, when you meet with an advisor for financial advice);
- when you visit our offices;
- from publicly available sources;
- from third parties (for example, from referees if you apply for a position as an employee or contractor with us).

### **How do we use your information?**

The purposes for which we use and disclose your personal information will depend on the circumstances in which we collect it.

Whenever practical we endeavour to inform you why we are collecting your personal information. We may provide you with these details in writing, through privacy notices and collection statements.

We may use or disclose your personal information:

- for the purposes for which we collected it (and related purposes (or, in the case of sensitive information, directly related purposes) which would be reasonably expected by you);
- for other purposes to which you have consented; and
- as otherwise permitted or required by law.

For example, we use personal information about our clients to understand their financial situation, formulate our professional advice and recommendations, manage your ongoing requirements and in connection with our business operations.

We may collect, use and disclose personal information about our employees and contractors (including any prospective employees or contractors) for work-related purposes (e.g. conducting reference checks, processing pay and other benefits, and monitoring your performance).

From time to time we will use your contact details to send you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest 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.

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

If you do not provide us with some or all the information that we ask for, we may not be able to do provide you with the products and services requested or allow you to participate in activities that depend on the collection of that information (including attending our offices).

You can contact us without using your name or by using a pseudonym. However we may need your name or contact details to respond to you or provide certain products or services.

### **Web and mobile data**

Personal data – We collect and store all the personal data that you supply to us on our financial planning software Xplan. This includes but is not limited to, copies of your identification, TFN/s etc. This information is only for the purposes of providing appropriate financial advice and being able to implement financial transactions that you consent to, on your behalf.

### **How do we store and protect your personal information?**

We strive to maintain the relevance, accuracy and 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 reporting or document retention requirements.

We hold the information we collect from you on our Financial Planning Software; Xplan and a small amount of paperwork on your hard file in our office. When your file is archived it is stored on Xplan under the archived category.

We ensure that your information is safe by utilizing the most up to date technology, ensuring IRESS (the owner of Xplan) maintains strict data security and all our users have unique login access codes and passwords which are immediately terminated upon any employee ceasing with the business.

We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

### **Will we disclose your personal information to anyone?**

We do not sell, trade, or rent your personal information to others. We will disclose your information to Sovereign Taxation Pty Ltd and Sovereign Lending Pty Ltd if you wish to engage in their services.

We may also need to provide your information to the following types of third parties (depending on the purposes for which we have collected your personal information):

- our employees;
- our selected corporate clients (e.g. for the purpose of ensuring our employees are compliant with customers' work, health and safety obligations);
- our contractors and other third parties that provide goods and services to us, including:
  - website and data hosting providers, document storage providers, centralised information system operators, anti-fraud and risk centres;
  - companies that evaluate service quality and customer satisfaction, marketing and

- profiling service providers and direct mailing service providers;
- companies that provide financial and accounting software;
- payment system operators, banks, financial intermediaries, credit institutions, other financing entities, insurance companies;
- credit collection and dispute management service providers;
- our accountants, insurers, lawyers, auditors and other professional advisers and agents;
- if you are an individual contractor to us or a prospective employee, to our related companies and HR related service providers (e.g. for outsourced payroll processing);
- any third parties to whom you have directed or permitted us to disclose your personal information (e.g. referees);
- in the unlikely event that we or our assets may be acquired or considered for acquisition by a third party, that third party and its advisors;
- third parties that require the information for law enforcement or to prevent a serious threat to public safety; and
- otherwise as permitted or required by law.

Where we disclose your personal information to third parties we will use reasonable efforts to ensure that such third parties only use your personal information as reasonably required for the purpose we disclosed it to them and in a manner consistent with the Privacy Principles under the Privacy Act.

We will not disclose your information to overseas recipients.

### **Links, cookies and use of our websites and applications**

Our website may contain links to other sites. This Privacy Policy applies to our website and not any linked sites which are not operated or controlled by us. We encourage you to read the privacy policies of each website that collects your personal information.

When you interact with our website or mobile applications, we may collect information by automated means, such as through the use of cookies. Cookies are small text files that are stored on your browser or device by websites, our mobile application, online media, and advertisements. We may use cookies and other similar technologies for a number of purposes, including to analyse site traffic and trends, and to generally understand the online behaviours and interests of people who interact with our services.

To the extent that information collected through “cookies” and similar technology constitutes personal information, we will handle such information in accordance with this Privacy Policy.

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

You may ask us for access to your personal information and to correct it at any time.

Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or complying with a correction request.

To access or correct your personal information, please write to Andrew Lawler, Privacy Officer, Locked Bag 35010, Collins Street West Vic 8007.

We do not charge for providing access to personal information.

In some limited situations, 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.

### **What happens if you want to complain?**

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer, Andrew Lawler, [andrew@sovereignfinancial.com.au](mailto:andrew@sovereignfinancial.com.au). Andrew can also be contacted on 03 9629 9223.

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

If you are not satisfied with the outcome of our assessment of your complaint, you may wish to contact the Office of the Australian Information Commissioner.

### **Updating this policy**

This Privacy Policy was prepared on 11 November 2021. We may update it at any time. The new version will be published on our website.

#### **SOVEREIGN FINANCIAL GROUP PTY LTD**

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Sovereign Financial is an FPA Professional Practice

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**PROFESSIONAL PRACTICE**  
FINANCIAL PLANNING ASSOCIATION of AUSTRALIA