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## OUR PRIVACY POLICY

Ballast Financial Planning Pty Ltd is a Corporate Authorised Representative of AD Advisory Services Pty Ltd (AFSL 237058) as such we follow guidelines as set out by them.

At AD Advisory Services Pty Ltd we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

### **What personal information do we collect, hold and how do we use it?**

When we advise you about your financial affairs we ask you for the information we need to understand your financial situation, needs and objectives. This can include a broad range of information ranging from your name, address, contact details and age to other information about your personal affairs including your assets, liabilities, financial situation and health. We provide any information needed to those with whom we deal with, on your behalf, to implement your financial, investment and insurance strategies and or manage your financial affairs.

We also use your information to enable us to manage your ongoing requirements, e.g. financial affairs, our related entities services and or our relationship with you, e.g. invoicing, additional services, client surveys etc. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

From time to time we will use your contact details to send you direct marketing communications including offers, updates, events, articles or newsletters that we think will be of interest to you. We may also send you regular updates by email or by post on financial, investment, insurance and finance matters. We always give you the option of electing not to receive these communications in the future. You can unsubscribe at any time by notifying us and we will no longer send this information to you.

We may also use your information internally and or share it with our related entities to help us improve and provide our services to you and help resolve any problems.

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

We can only fully advise you about your financial affairs if we have all the relevant information. If you do not provide us with some or all of the information that we ask for, we may not be able to advise or assist you.

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.

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

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

We hold the information we collect from you in our client files, on our internal computers and servers. Our information technology service providers may use external servers for offsite backup and we may keep external hard-drives stored offsite. In some cases, your file is archived and sent to an external data storage provider for a period of time.

We ensure that your information is safe by limiting access to your data to authorised personnel only with password login access to electronic files. We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

### **Web and Mobile Data**

We may collect personal and other information from you directly or via your use of our services on our web pages. We will only collect personal information which is reasonably necessary for, or directly related to, our functions or activities.

Our website may also contain links to the websites of third party providers of goods and services (**Third Party websites**). If you have accessed Third Party websites through our website and if those third parties collect information about you, we may also collect or have access to that information as part of our arrangements with those third parties.

Where you access a Third Party website from our website, cookie information, information about your preferences or other information you have provided about yourself may be shared between us and the third party.

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**Disclosure to overseas entities** – We do not generally disclose personal information obtained from cookies to overseas entities in the course of our activities.

**Anonymous data** – We may use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider may log your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

**Cookies** – In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. If you use only temporary cookies, insert “Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.” If you use permanent cookies, insert “They allow the website to recognise your computer when you return in the future”.

**Will we disclose the information we collect to anyone?**

We do not sell, trade, or rent your personal information to others. We may disclose your information to recipients in the United States of America for the purpose of required transaction notifications (E.g. Form W-8 BEN). We may also store your information in the ‘cloud’ for the purposes of data storage and file backups. These ‘cloud’ service providers may be in countries not regulated by laws, which protect your information in the way that is similar to the Privacy Act. If a recipient is not regulated by laws, which protect your information in a way that is similar to the Privacy Act, we will seek your consent before disclosing your information to them. We will not be accountable for any recipient’s breach of Australian privacy laws and you will not be able to seek redress under those laws.

We will disclose your information to any lenders or service providers that you choose to deal with and may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

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

If you wish to access or correct your personal information, please write to us and contact our Privacy Officer.

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant or out of date.

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

In some limited cases, 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?**

If you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer.

Your complaint will be considered by us through our internal complaints resolution process and we will try to respond with a decision within 45 days of you making the complaint.

**Your consent**

By asking us to assist with your financial affairs and needs or accessing our web pages, you consent to the collection and use of the information you have provided to us for the purposes described above.

**Tell us what you think**

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact us.