

# Adviser Services Hub

## Privacy Policy

This document outlines Adviser Services Hub (ASH) Pty Ltd policy on handling the personal information that we collect about individuals including customers, potential customers, business partners, and shareholders.

'ASH', 'we', 'us' or 'our' refers to the ASH group entities operating in Australia listed on page 4. We provide Licensing for superannuation, investment, administration and financial advice.

We are committed to protecting your privacy. When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with. At all times we will comply with the terms of this policy when handling your personal information. This policy answers the following questions about privacy at ASH:

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## **Why do we need your personal information?**

Protecting your personal information is important to us and we will only collect the information necessary to enable us to provide our products and/or services to you. We understand some information is more sensitive so we will be clear about why we are collecting it, what we intend to use it for and how we will protect it.

In this policy, personal information is any information that could identify you or be used to establish your identity.

We collect, hold, use and disclose personal information so we can establish, manage and administer the products and services provided by us, and comply with legal and regulatory obligations. We may also use and disclose your information for purposes related to those mentioned above, such as:

- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Enhancing our customer service and product options (see the section ‘Will my personal information be used for direct marketing?’)
- Internal operations, such as record keeping, data analytics, auditing or training.

## **Will my personal information be used for direct marketing?**

We use and disclose your personal information to keep you informed about the range of financial products and services we offer.

You can opt out of receiving direct marketing information from us at any time (see the section ‘How can you contact us about privacy?’).

## **What happens if I do not provide information that has been requested?**

It’s your choice whether to provide your personal information. However, if you don’t, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud. Where you are seeking financial advice, it may also affect our ability to properly analyse your personal circumstances.

## **What types of personal information do we collect?**

We may ask for a range of personal information, limited to what we need, to assist us in providing you with relevant financial products and services. The information we request could include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, health information, employment details, domicile and citizenship status.

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

Most of the personal information we collect will be directly from you. We gather this information either through application forms or other forms that you complete and submit to us (in writing and digitally), and by recording the information you provide via phone calls and interviews.

In some cases we might collect your personal information from external sources. Examples of the people, agencies or organisations that may provide us with information are:

- employers, when a new employee joins their superannuation plan
- parents or guardians in respect of children
- persons authorised by you (such as lawyers or accountants)
- other credit providers
- public sources of information (such as telephone directories)
- market research organisations (through surveys or telephone polls)
- third-party brokers (such as mortgage brokers)
- credit reporting bodies
- agencies such as the Australian Taxation Office

We only collect your information from external sources if it is impractical to collect it directly from you, or when we are permitted to do so.

## **Can you remain anonymous or use a pseudonym when dealing with us?**

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

## How do we protect your personal information?

Whether your personal information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet or other methods, we take steps to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats.

We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include training our staff and financial advisers who handle personal information on the importance of maintaining the confidentiality of personal information and the privacy of individuals.

When we don't need your personal information anymore we will delete, destroy or de-identify it.

In the unlikely event of a data breach we have measures in place to manage and respond to data breaches, which includes the notification to impacted individuals and data protection authorities, where required.

## Who do we share personal information with?

From time to time we may share your personal information with other entities both within and outside of ASH. The entities that we might share your personal information with vary according to the product or service involved, but could include:

- financial advisers authorised by ASH
- service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance or research services, some of whom may contact you on our behalf
- insurers, including reinsurance companies, and credit providers
- courts, tribunals and other dispute resolution bodies in the course of a dispute
- credit reporting or reference agencies
- employers contributing to or otherwise participating in our superannuation plans
- policy committees in our superannuation plans
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service)
- other financial services institutions – in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

## Do we send personal information to overseas recipients?

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might end up stored or accessed in overseas countries.

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

## How do we update your personal information?

We will update your personal information if you contact us. In most cases you can update your personal information over the phone or via our website.

We may update your personal information if we believe the personal information we hold is incomplete or out of date, we could seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

## How can you contact us about privacy?

You can call us on 1300 887 337, send an email to [admin@adviserserviceshub.com.au](mailto:admin@adviserserviceshub.com.au) or write to us at ASH Customer Service Centre Suite 2, 15 Forest Rd Hurstville 2220, to:

- seek more information about anything contained in this policy, or to request a printed copy of this policy
- update or correct your personal information
- opt out of receiving direct marketing material
- ask about accessing or correcting the personal information we hold about you; or
- make a privacy related complaint.

## How do you find out about your personal information we hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us (see how you can contact us about privacy). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time.

There are some situations where we are allowed to refuse or limit your access to information, for example when the information is commercially sensitive. If that happens, we'll write to you and let you know why.

There is no charge for making a request to access your personal information. However, in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

## How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed at the start of this section.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. We'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

## How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to The Responsible Manager by email to [admin@adviserserviceshub.com.au](mailto:admin@adviserserviceshub.com.au) or write to: The Responsible Manager, Suite 2, 15 Forest Rd Hurstville 2220

Alternatively you can contact an external body:

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner – call 1300 363 992 or find them online at [oaic.gov.au](http://oaic.gov.au).
- If your complaint is about the products and services we provide you can contact the Australian Financial Complaints Authority – call 1800 931 678, in writing to Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001 or online at [info@afca.org.au](mailto:info@afca.org.au). There may be a time limit for referring your complaint to AFCA. You should contact them or visit their website for more details.

## About this policy

This policy is effective as of 7 December 2020. We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy, or contact us for a printed copy.

This policy applies to the following entity Adviser Services Hub Pty Ltd