

The privacy of your personal information is important to us at Parker Financial Services, Corporate Authorised Representative of Parker Wealth Management Pty Ltd (Australian Financial Services Licensee 519344, ABN 42 636 318 593) (**we, us, our**). We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and we are required to comply with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information and ensure the quality and security of your personal information. We will always seek to comply with the Australian Privacy Principles as well as other applicable laws affecting your personal and sensitive information.

### About this policy

This privacy policy outlines our policy on how we manage your personal information. It also sets out generally what sort of personal and sensitive information we hold, for what purposes and how we collect, hold, use and disclose that information.

### Collecting your personal information

Personal information is sensitive information that includes information about your religion, racial or ethnic origin, political opinions, criminal record and sexual orientation. It may also include health information and biometric information. Therefore, any references in this policy to personal information may also include sensitive information.

The collection of sensitive information is restricted by the Privacy Act. Generally, we only collect your personal and sensitive information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy. Additionally, sensitive information may also be obtained in relation to hardship circumstances and/or where we need to provide additional care to clients in vulnerable circumstances.

Your personal and sensitive information will be collected and held by Parker Financial Services, a corporate authorised representative of Parker Wealth Management Pty Ltd (Australian Financial Services Licensee), for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- protecting our business and other clients from fraudulent or unlawful activity;
- complying with relevant laws, regulations, fraud prevention and other legal obligations;
- helping us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested; and
- for any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers by contacting our office on 02 6267 0700, by emailing your adviser directly, or emailing us at [info@parkerfinancial.com.au](mailto:info@parkerfinancial.com.au). We will process your request as soon as practicable.

## What kinds of personal and sensitive information do we collect and hold?

To offer personalised advice tailored to you, your investment goals and financial needs, we may collect and hold personal and sensitive information about you, such as:

- your name, gender, contact details and date of birth;
- your tax residency and social security eligibility;
- your occupation, employer, employment history and educational qualifications;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- preferences or values in relation to financial products, investments, strategies and risk tolerance;
- Government identifiers such as your tax file number (TFN), Centrelink identifier, director identification number (DID), identification documents and photographs;
- details about members of your family, related entities, and their circumstances;
- any corporate or trustee relationships, where you are shareholder, beneficiary, settlor or controlling person under these entities, and/or memberships of professional or trade associations;
- your signature either in hard copy or digitally;
- records of our discussions (with your consent); and
- any other information that we consider necessary, such as identification information from your Power of Attorney (POA) or Enduring Power of Attorney (EPOA).

## How do we collect personal information?

If it is reasonable and practicable we will only collect your personal and sensitive information from you. Generally, your personal information will be collected when you meet with your adviser in person, where you provide your adviser with information over the telephone or supply us with written material or copies of documentation. We also collect information from you electronically, for instance, when you visit our website or if you send us electronic correspondence (see below "Do we collect personal information electronically?"). We may need to collect personal and sensitive information from third parties such as your accountant or superannuation provider. The information that we seek to collect about you will depend on the products or services that we provide.

Sometimes we collect personal or sensitive information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, accountant, mortgage broker, executor, administrator, guardian, trustee or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you; and
- insurers, re-insurers and health care providers.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

Throughout the term of our relationship, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

## Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications. Each time you visit our website, we collect information about your use of the website, which may include the following:

- the date and time of visits;
- which pages are viewed, navigation patterns and user interactions, including how users navigate through the site and interact with pages (for example, fields completed in forms and online requests submitted);
- location information and IP addresses; and
- information about the device used to visit our website.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience. One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent or retrieved by any other website. We won't ask you to supply personal information publicly via any social media platforms.

## Do I have to provide you my full information?

You have the right to remain anonymous and/or not to provide us your personal or sensitive information. However, we specialise in providing personal financial advice and developing strategies that consider your personal circumstances, objectives and needs. Where we do not have the necessary information to ensure our advice is in your best interests, for example if it is inaccurate or incomplete, we may not be able to provide you with advice and or services and the advice may not be appropriate. Where you provide limited information, we will make you aware of any limitations or risks we can identify given any limited advice we may provide.

## Tax file numbers (TFNs)

Taxation laws generally prohibit the collection, use and disclosure of TFNs. However, an investment body may be informed of a TFN by a person acting on behalf of another person. We may need to collect your TFN to administer and/or implement our recommendations in line with the information below. Upon completion of use, your TFN will be removed and/or redacted from our records. An alternative is for you to provide your TFN directly to the relevant body.

Investment and superannuation bodies generally ask for your TFN, for the following reasons:

- to administer and implement recommendations in line with taxation laws and relevant regulations;
- to avoid unnecessary taxation;
- to allow super funds to effectively process personal after-tax contributions; and
- to consolidate superannuation accounts.

You are not required to provide us or any other body with your TFN and it is not an offence to choose not to do so. However, if you do not quote your TFN or exemption status to authorised bodies (as applicable):

- your investment income and concessional super contributions may be taxed at the highest marginal rate plus Medicare levy;
- you may pay more tax on your super benefits than required (you may get a refund at the end of the financial year in your income tax assessment);
- your super fund may be required to reject your personal after-tax contributions;
- it may be difficult to find and consolidate your superannuation accounts.

You may be exempt from the TFN quotation requirements; typically, the following exemptions apply:

- persons receiving a qualifying pension/benefit;
- children under the age of 16;
- entities not required to lodge income tax returns; or
- non-residents.

## What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you as outlined in the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- your TFN, if you choose to provide it as specified in the Income Tax Assessment Act 1936 (Cth); and
- certain information in relation to your application if you have applied for insurance as required by the Insurance Contracts Act 1984 (Cth).

## Using and disclosing your personal information

Your personal and sensitive information may be disclosed for purposes related to the provision of the financial advice you have requested and internally to help us improve our services with you.

The types of service providers that may be provided with your personal and sensitive information are:

- other financial advisers and organisations involved in providing the financial advice you have requested such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, health care providers, the trustee of your superannuation fund (where this information is requested by them to satisfy their compliance requirements to deduct adviser service fees from your account), and product issuers in connection with the provision to you of the financial advice you have requested, including obtaining third party checks into whether you are eligible for the product or service;
- organisations that assist in operating a financial planning business such as those that provide administrative support, financial, accounting, audit and compliance, insurance, research, legal, technology, computer, IT and cyber and data security services, or other business services;
- your representatives or service providers such as your accountant, mortgage broker, property valuer, guarantors, (including prospective) family members, executor, administrator, guardian, trustee, attorney, solicitor, tax agent, stockbroker or bank;
- payment system operators (for example, merchants receiving credit card payments);
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- Government authorities, regulatory bodies, disciplinary panels, law enforcement agencies and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- communicating with you, managing or improving the product or services we provide you (such as invoicing or client surveys), assisting you with queries and requests, and obtaining feedback or managing complaints;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

## Organisations outside Australia

We may store your information in cloud or other types of networked or electronic systems. Electronic or networked systems can be accessed from various countries via an internet connection, so it's not always

practicable to know in which country your personal and sensitive information may be held. In order to provide you with our services, we may need to share your information with organisations outside Australia (for example, Information Technology providers), that store data in America and Singapore. If your information is stored in this way, disclosures may occur in countries other than those listed, see the Microsoft Data Centre Locations link below. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

We use resources and service providers that may have all or part of their operations overseas, store data overseas, access services overseas or utilise third parties who are overseas. Specifically, we have engaged the services of 5Elk in the Philippines, and Aptium Assist in Vietnam, to assist our local team in the provision of administrative and paraplanning services. Where we use the services of external organisations, we may disclose your personal and sensitive information via secure internet connection, in some instances via email, and our outsourced teams access most of the same secure systems detailed below, in the same way our local teams access these secure systems. Our outsourced teams are directly trained and managed by us, and those external organisations are bound by confidentiality arrangements.

Parker Wealth Management Pty Ltd maintains an Outsourcing Policy which governs the selection of service providers to ensure quality providers are selected and that their privacy policy aligns with our philosophy of protecting our clients' privacy.

Below, we provide a list below of our main third-party service providers, third-party applications or cloud base applications we may use, including links to their privacy policy and their data centre locations where available.

**Xplan** (Financial Planning Software, Customer Relationship Management, Portfolio Reporting and Cloud File Storage)

Privacy Policy: <https://www.iress.com/resources/legal/privacy/>

Data Protection Policy: <https://www.iress.com/resources/legal/data-protection/>

**my prosperity** (Client portal)

Privacy Policy: <https://www.myprosperity.com.au/privacy-policy-2>

**Microsoft** (Cloud File Storage and Business Applications)

Privacy Statement: <https://www.microsoft.com/en-us/privacy/privacystatement>

Data Centre Locations: <https://learn.microsoft.com/en-us/microsoft-365/enterprise/o365-data-locations?view=o365-worldwide>

**DocuSign** (Electronic Signature and Document Storage Application)

Privacy Policy: <https://www.docusign.com/privacy>

**Aptium Assist** (Administration and Paraplanning)

Privacy Policy: <https://aptium.co/privacy-policy.html>

**5Elk** (Administration)

Privacy Policy: <https://www.5elk.com/privacy-policy/>

**Fourth Line** (Advice compliance audits)

Privacy Policy: <https://fourth-line.com.au/privacy-policy-2/>

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

How do we protect the personal and/or sensitive information we hold?

Your personal information is generally held in client files or a computer database where we have taken reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. We have implemented security measures on all computers, programs and mobile devices accessing our IT systems and data backups. We have controlled access to our principal place of business, secure paper files, provide employee training and clauses in employee and contractor agreements regarding confidentiality and destroying and de-identifying data when it is no longer required or inadvertently provided by a third party. We will link personal information across business processes where practicable.

Unfortunately, the transmission and storage of any data, including your personal information, over the internet or within cloud-based storage systems may not be completely secure. Whilst we will endeavour to protect your personal information, it is possible that third parties, outside our control, may be able to access, obtain or intercept transmissions or private communications without our knowledge or consent.

As a result, we cannot ensure the security of data, and any transmissions or electronic communications between us knowing this risk. As we take reasonable steps to secure all computing devices used in connection with our website, software, system and services, we recommend you do the same and ensure any internet accessible storage or portable devices, such as your mobile phone are secure.

If you have reason to believe that your interaction with us is no longer secure, for example, if you fear the security of any account, please change your passwords and contact us immediately.

### What is a notifiable data breach?

The Privacy Act includes a Notifiable Data Breaches (NDB) scheme, which requires us to notify you and the Office of the Australian Information Commissioner (OAIC) of certain breaches likely to cause harm and recommend steps you can take to limit the impacts of a breach (for example, a password change).

If we believe there has been a data breach that impacts your personal and sensitive information and creates a likely risk of serious harm, we will notify you and the OAIC as soon as practicable and keep in close contact with you about the nature of the breach, the steps we are taking and what you can do to reduce the impacts to your privacy.

### Accessing your personal information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access we will provide you with the reasons for this decision. To request access please contact us (see "Contacting us and privacy issues" below).

### Correcting your personal information

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal and sensitive information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and provide us with evidence that it is not accurate, complete and up-to-date.

If we agree that the personal information requires correcting we will take reasonable steps to do so. If we do not correct your personal and sensitive information, we will provide you with the reasons for not correcting that information. If you ask us to add a statement to the information indicating that it is not accurate, complete, or up-to-date, we will take reasonable steps to comply with your request.

### How long do we keep your personal information?

We will generally keep your personal and/or sensitive information for as long as the law requires us to, or whilst you continue to be client of Parker Wealth Management Pty Ltd.

We also retain your personal information for at least seven years after you cease being a client. This is a legal requirement that allows us to demonstrate we have complied with relevant financial service laws and are able to respond to any questions or complaints.

We periodically review the information we no longer need and take steps to delete this.

### Who does the European Union General Data Protection Regulation (GDPR) apply to?

If you are a resident of, or a business 'established' in a country, that is a member of the European Union Economic Area (the EU and Norway, Lichtenstein and Iceland), you are entitled to additional protections provided by the GDPR, other than the protections already afforded to you under the Privacy Act.

In certain circumstances, this may include, but is not limited to, the right to:

- have your personal information erased;
- access your personal information in an electronic and portable format; and
- restrict, object or withdraw your consent to the processing of your personal information.

## Contacting us and privacy issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us using the details below. We are committed to resolving complaints within a fair and reasonable timeframe. Wherever possible, complaints will be resolved promptly at the first point of contact. Where this is not possible, we aim to resolve complaints within 30 days as explained fully in our Complaints Handling Policy, which is also accessible from our website, [www.parkerfinancial.com.au](http://www.parkerfinancial.com.au).

- The Compliance Manager
- [info@parkerfinancial.com.au](mailto:info@parkerfinancial.com.au)
- 02 6267 0700
- GPO Box 1369, Canberra ACT 2601

If you are unhappy with our response, there are other bodies you can go to including the Australian Financial Complaints Authority and/or the Office of the Australian Information Commissioner.

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal and sensitive information. The Commissioner can be contacted at:

### Office of the Australian Information Commissioner (OAIC)

- Website: [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- Phone: 1300 363 992
- In writing to: GPO Box 5218, Sydney NSW 2001

### Australian Financial Complaints Authority (AFCA)

- Website: [www.afca.org.au](http://www.afca.org.au)
- Email: [info@afca.org.au](mailto:info@afca.org.au)
- Phone: 1800 931 678 (free call)
- In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

## Changes to our Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy and we encourage you to review this policy periodically. While we seek to maintain the currency of the third-party links in this policy, third party privacy policies may change prior to our own review of our policy. We therefore encourage you to check any link is the most up-to-date privacy policy from any of our listed third-party providers. This Policy was last reviewed as per the version date recorded at the bottom of this Policy.

## Providing us other information

Please make anyone in which you have provided their personal information to us aware of this Privacy Policy. If you provide us another person's sensitive information, ensure you seek their consent and make them aware of this Policy. Where you have actively provided personal information about children under the age of 16, as their parent or guardian in this capacity, by providing us this information, you have given your consent for us to hold this information. Where you provide any information in this regard in the absence of the other parent or guardian, please seek their consent and make them aware of this Privacy Policy.

## Links to other sites

Where our website may provide links to other sites for you to access, you should be aware that these other sites are not subject to this Privacy Policy or our privacy standards and our procedures. You will need to contact the owner of any link directly to ascertain their privacy standards.

## Client consent

By asking us to assist with your financial needs, you consent to the collection and use of your personal and sensitive information you have provided us with, for the purposes described in this Privacy Policy.

If you do not agree with the terms of this Privacy Policy, please do not use our website or otherwise provide us with your personal and/or sensitive information.