

# Privacy Policy

**Version 1:** 1 September 2020

Protecting our clients' privacy is very important to us. To ensure our compliance with the Privacy Act and as part of our commitment to ensuring the safety of your private and confidential information, we have established and implemented this policy.

The Privacy Act requires that we handle your personal information in accordance with a set of national principles known as the Australian Privacy Principles (APPs), which regulate collection, use, correction, disclosure and transfer of personal information about individuals by organisations like us in the private sector.

The policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the APPs.

## Collecting Your Personal Information

Your personal information will be collected and held by Flynn Sprake Financial Planning who is a corporate authorised representative of EMR Services Pty Ltd an Australian Financial Services Licensee, for the purposes of:

- Providing advice, products and services to you
- Managing and administering the products and services
- Letting you know about other products and services
- For any purpose for which you have given your consent

The type of information collected from you includes information that is necessary to operate your account or for us to provide advice to you. We may ask you to provide personal information such as your:

- Name
- Email address
- Residential and/or postal address
- Date of birth
- Telephone number
- Bank account details
- Financial details
- Tax file number (TFN)
- Occupation
- Employer
- Family circumstances
- Social security eligibility
- Your Investment preferences and risk tolerance
- Any other information that we consider necessary

If it is reasonable and practicable, we will only collect your personal information from you. Generally, this information will be collected when you meet with your adviser in person, over the phone or with written material. We may need to collect personal information from third parties such as your accountant, employer, product issuer or solicitor.

There are specific circumstances in which we will ask for your consent to provide sensitive information such as:

- personal health information from you when you apply for insurance or from medical practitioners when you make a claim
- income information from employers when you apply for additional insurance protection or salary continuance insurance
- details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993* (Cth), to pay benefits in the event of your death

We will inform you of any legal requirements for us to ask for information about you and the consequences of not giving us that requested information. For example, in addition to the personal information we will obtain from you, whenever you acquire a new product or service from us, we will require documents evidencing your identity. Such evidence may include a certified copy of your driver's licence, passport or birth certificate.

You are not obligated to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or delay the processing of your application or claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact the taxation treatment of your account.

### **How Your Personal Information is Held**

Your personal information is generally held in client files or a computer database. We will link personal information across business processes where practicable.

We take reasonable steps to ensure that the personal information we hold is protected from misuse and loss and from unauthorised access, modification and disclosure.

We will also take reasonable steps to destroy or permanently de-identify personal information we no longer need for any purpose for which it may be used or disclosed under the APPs.

### **Using and Disclosing Your Personal Information**

Where personal information is disclosed, there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we may disclose your personal information include:

- organisations involved in providing, managing or administering our products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers.
- funds administrators or trustees to which your benefit is to be transferred or rolled over
- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or any other person who may be entitled to receive your death benefit, or any person contacted to assist us to process that benefit
- financial institutions that hold accounts for you
- businesses that may have referred you to us

There are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

We may also disclose your information if you give your consent.

### **Organisations Outside Australia**

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

### **Accessing or Correcting Your Personal Information**

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested.

### **Contacting us and Privacy issue**

You can obtain further information on request about the way in which we manage personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us using the below details:

Marie Suthern  
admin@emrw.com.au  
02 6921 1999  
PO Box 383 WAGGA WAGGA NSW 2650

If you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

*Office of the Australia Information Officer*

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

OR

*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

In Writing to – GPO Box 3 MELBOURNE VIC 3001

\*The Australian Financial Complaints Authority or 'AFCA' is a new external dispute resolution (EDR) scheme to deal with complaints from consumers in the financial system. AFCA replaces the three existing EDR schemes of the Financial Ombudsman Service (FOS), the Credit and Investment Ombudsman (CIO) and Superannuation Complaints Tribunal (SCT) so that consumers have access to a single EDR scheme.