



»» **We take your privacy
seriously at Collins SBA**

RESPECTING YOUR PRIVACY AND THE LAW

Collins SBA



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Collins SBA is committed to ensuring your privacy is protected. We comply with the Australian Privacy Principles (APPs) as contained in the Privacy Act 1988. This policy was last updated 15 July 2021. The privacy of your personal information has always been important to us at Collins SBA. In addition to complying with existing laws that govern confidential information that you provide to us, we are also required to comply with the Privacy Act and the Australian Privacy Principles. This policy explains how we comply with the Privacy Act when collecting, using, disclosing, storing and destroying your personal information. It also explains how you can access or correct personal information we hold about you and what you can do if you think your privacy has been interfered with. In addition to this policy, we are required to comply with a range of laws and professional standards relating to confidentiality and privacy for our clients.

Who are we?

We are a group consisting of: SBA Financial Group Pty Ltd (ABN 17 073 859 346), which provides accounting and taxation services; SBA Wealth Management Pty Ltd (ABN 58 585 824 199), which provides wealth advisory services as a corporate authorised representative of SBA Advice Pty Ltd AFSL 488301 (ABN 44 611 373 383); and Collins SBA Nominees Pty Ltd (ABN 87 104 489 330), which provides business administration and support services to the other entities. Collectively and separately these entities are known as Collins SBA. We also refer to each entity as being a member of the Collins SBA Group. These entities are related to each other within the meaning of the Corporations Act 2001 (Cth). Throughout this policy we are referred to as Collins SBA, we or us. We refer to an individual as you.

What information does this policy cover?

Personal information is information or an opinion, about an identified individual, or an individual who can be reasonably identified from that information.

Personal information may include sensitive information about the individual such as racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health, genetic or biometric information.



What personal information do we collect?

The personal information that we collect about you will depend on the products or services that you apply for, or enquire about. The extent of the information requested, how we use it and its disclosure are determined by our obligations, the obligations of entities that provide services to us and product issuers under financial services laws, taxation laws, superannuation laws and Anti-Money laundering and Counter-Terrorism Financing Act. Some laws require us to collect information about and verify your identity before we provide services to you. We may be required to request your Tax File Number. You are not required to provide your Tax File Number to us, however there may be consequences for not doing so.

If you do not allow us to collect all of the personal information we reasonably request, we may not be able to deliver those products or services to you. We will only collect 'sensitive information' where we have obtained your express consent and if it is necessary to provide you with a specific product or service.

Wealth advice

To enable us to provide you with financial advice that is suitable for your investment objectives, financial situation and particular needs we need to collect and hold personal information about you. The law, in particular the FASEA Code of Ethics, requires that we act with integrity and in the best interests of our clients (Standard 2), that all advice and product recommendations must be in the best interests of our clients (Standard 5) and that we must take into account the broad effects arising from the client acting on our advice and actively consider the clients broader, long-term interests and likely circumstances (Standard 6).

Therefore, we collect personal information for the purposes of:

- Providing you with the advisory and/or lending services that you have requested;
- Managing our relationship with you; and
- Contacting you about products and services in which you may be interested

The information we collect includes:

- Your name, contact details and date of birth;
- Employment details and history;
- 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;
- Details of your investment preferences and risk tolerance;
- Family circumstances and social security eligibility; and
- Any other information that we consider necessary.

Where we collect information about your family situation, such as information about your partner, dependents, beneficiaries, and children, we will only gather information necessary to provide you with the services requested. You are not obliged to provide this information and were it reasonably required from you, we expect and assume that you have their consent to provide this information. The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

Your financial adviser is an authorised representative of SBA Advice Pty Ltd, an Australian Financial Services Licensee (AFSL 488301).



Accounting, taxation and lending services

To enable us to provide taxation, accounting and lending services to you, we collect your personal information. We collect personal information for the purposes of:

- Providing you with the accountancy, taxation and/or lending services that you have requested;
- Managing our relationship with you; and
- Contacting you about products and services in which you may be interested.

The information we collect includes:

- Your name, contact details and date of birth;
- Employment details and history;
- Financial details including information about your assets and liabilities, income, expenditure, superannuation, business activities and investments;
- Family circumstances and social security eligibility; and
- Any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations. If we do not collect the information we require then we may be unable to provide you with the services you have requested.

As a registered tax agent (number 6854 9007), SBA Financial Group Pty Ltd is authorised by the Tax Agent Services Act 2009 to request your tax file number (TFN). You do not have to provide us with your TFN. However, quoting your TFN reduces the risk of administrative errors and having extra tax withheld. Failing to quote your TFN may prevent us from providing you with all the services you have requested. If you provide us with your TFN we will only disclose it to the ATO and we will only do so when necessary to conduct your affairs. interests and likely circumstances (Standard 6).

Other information

We only collect personal information that is necessary for our functions or activities. We will ensure you are aware when we collect your personal information and the primary purpose of its collection. We will only collect sensitive information with your consent or where permitted by the Privacy Act. There may be consequences if you do not provide us with all information sought from you. We will let you know what those consequences are when requesting the information. If you provide us with more information than we have requested we will destroy it unless it is necessary for our functions or activities. The type of information we collect will depend on the reason we are collecting your information but may include contact details, employment and educational history (for prospective employees) and financial details (for prospective contractors).

How do we collect personal information?

If it is reasonable and practicable we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material.

We may need to collect personal information from third parties, such as your accountant or publicly available sources where it is unreasonable or impractical to collect it from you directly, or where we have your consent.

This consent could be implied, for example where we are providing services to a family group and information about the whole family is collected from one individual.



How do we store personal information?

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility. Normally correspondence and documentation is scanned and stored in our computer system, with originals returned to you or destroyed. In some circumstances we will store hard copy originals or return them to you. We will seek to ensure that we take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure.

Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems. We may store your information in the cloud or other types of networked or electronic storage. If your information is stored in this way, disclosures may occur to other countries. Overseas organisations may be required to disclose information we share with them under a foreign law.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the Australian Privacy Principles. In general information is retained for seven years from the date it was last used. Certain information (for example, information which may have a bearing on capital gains tax calculations) may be kept indefinitely. Please be aware that sending personal information by email or through our website may not be secure. If you are concerned about the security of sending information this way you should arrange alternative delivery of information, for example by registered post.

How do we use your personal information?

We will use and disclose your personal information for the purpose for which we collected it. We may also use your personal information for related purposes which you would reasonably expect. We will take reasonable steps to ensure the information we use is accurate, up-to-date, complete and relevant, having regard to the reasons why it is being used. Sensitive information will be used and disclosed only for the purpose for which it was collected, a directly related secondary purpose, with your consent or as required or allowed by law. We may use your personal information for the purpose of direct marketing to you where you would reasonably expect this. We may provide you with information about relevant products and services offered by Collins SBA or SBA Advice Pty Ltd. If you do not wish to receive direct marketing materials from us or our clients you can opt-out by contacting us. Our contact details are included with all direct marketing materials.



Who do we disclose personal information to?

One member of the Collins SBA Group may share your personal information with the other members of the Collins SBA Group so we can provide our services. This privacy policy applies to each member of the Collins SBA Group.

Where reasonably necessary for an approved purpose, we may disclose your personal information to: other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers and paraplanners; brokers, insurance providers, superannuation trustees and product; financial institutions, organisations that assist us in operating our business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services. We may also disclose information to your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank; government authorities, professional organisations, auditors, insurers and other organisations when required by law; and organisations that you have consented to your personal information being disclosed to.

If we sell, finance or restructure all or part of our business we may disclose your personal information to other organisations for that purpose, including as part of due diligence, sale of assets or transfer of customers.

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; where you have consented to the use or disclosure; or in other circumstances where the Australian Privacy Principles authorise the use or disclosure (for example, where disclosure is required by or authorised under law).

In order to provide you with our services, we may share your information with IT service providers and subcontractors outside Australia.

We regularly engage providers and/or software providers who store data in the cloud. This means your personal information may be located in the Philippines, Vietnam, the United States of America, Canada, Ireland, Singapore, New Zealand and/or Asia. We normally make those disclosures on the basis of a reasonable belief that entities in those countries are subject to a law or binding scheme which protect your personal information in a way that, overall, is substantially similar to the way the Australian Privacy Principles protect your information.

You can access mechanisms to enforce those schemes in those countries. We will take reasonable steps to ensure the personal information we disclose to others is accurate, up-to-date, complete and relevant, having regard to the reasons why it is being disclosed. We may also disclose your information to others where we have your consent.



How can you access personal information we have about you?

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 our details below). We may charge you a reasonable fee to access that information, for example to recover the costs of photocopying or if we have to spend a significant amount of time to provide you with access. We may need to verify your identity before providing access to your personal information. We will try to provide you with access to your personal information within 14 days of receipt of your written request for access or 30 days where responding to the request is more complicated.

What if your personal information is not correct?

We endeavor to 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 information that we hold is not accurate, complete or up to date please contact us (see our details 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 information, we will provide you with the reasons for not correcting your personal information. We will try to resolve all requests within 14 days of receipt of your written request or 30 days where the matter is more complicated. We will not charge a fee to correct that information.

Notifiable Data Breaches

From February 2018, the Privacy Act includes a new Notifiable Data Breaches (NDB) scheme which requires us to notify you and the Office of the Australian Information Commissioner (OAIC) of certain data breaches and recommend steps you can take to limit the impacts of a breach (for example, a password change).

The NDB scheme requires us to notify about a data breach that is likely to result in serious harm to affected individuals. There are exceptions where notification is not required. For example, where we have already taken appropriate remedial action that removes the risk of serious harm to any individuals.

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

If you believe that any personal information we hold about you has been impacted by a data breach, you can contact us using the contact details below.



How do you complain about interferences with your privacy?

If you have a question or complaint about how your personal information is being handled by us, or are concerned about an interference with your privacy, please contact us first by using the contact details below.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within ten (10) business days, but some complaints may take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response. We will consider and respond to your complaint within 10 working days. We will seek to resolve the complaint with you.

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:

*Email: reception@collinssba.com.au
Post: Privacy Officer, Collins SBA, GPO Box 1082, Hobart, Tasmania 7001
Phone: 1300 265 722
Web: www.collinssba.com.au*

Is there anyone else you can complain to?

You can make a complaint about interferences with your privacy to the Office of the Australian Information Commissioner.

Please note the OAIC requires any complaint must first be made to the respondent organisation. The law also allows 30 days for the respondent organisation to deal with the complaint before a person may make a complaint to the OAIC.

The Commissioner can be contacted at:

*Email: enquiries@oaic.gov.au
Post: Office of Australian Information Commissioner, GPO Box 5218, Sydney NSW 2001
Phone: 1300 363 992 Fax: 02 9284 9666
Web: www.oaic.gov.au*

The Australian Financial Complaints Authority (AFCA) can consider certain privacy complaints relating to either the provision of credit or credit reporting information in general.

The contact details for AFCA are set out below:

*Australian Financial Complaints Authority
Web: www.afca.org.au
Email: info@afca.org.au
Phone: 1800 931 678 (free call)
Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001*

Changes to the Privacy Policy

We may change the way we handle personal information from time to time. If we do so, we will update this Privacy Policy. An up-to-date version of this policy is available at any time at www.collinssba.com.au