

## Privacy Policy

### Our Commitment

Nest Financial Services Pty Ltd is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Amendment (Private Sector) Act (2000) sets out a number of National Privacy Principles (NPPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

Nest Financial Services Pty Ltd believes that this Privacy Policy discloses how the personal information you provide to us, and our representatives, is collected, used, held, disclosed and disseminated.

Nest Financial Services Pty Ltd is required to meet particular legislative and regulatory requirements. In order to provide a comprehensive financial planning advice to you, we are required to collect certain personal information from you.

We encourage you to check our website regularly for updates to our Privacy Policy.

### Your Personal Information

As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you (including s961B of the Corporations Act), including:

- your name, date of birth, current addresses, telephone/mobile/fax numbers, e-mail address;
- information regarding your dependents and family commitments
- your occupation, employment history and details family commitments and social security eligibility.
- your financial needs and objectives;
- your assets and liabilities (current and future), income, expenses;
- your superannuation and insurance details;
- your social security entitlements; and
- your risk profile details.

In certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party."

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or afflations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including:

- the collection is required by law; and
- when the information is necessary for the establishment, exercise or defence of a legal claim.

## How We Collect Personal Information

Nest Financial Services Pty Ltd collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- directly from you, when you provide information through a data collection form;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet; and
- directly from fund managers, superannuation funds, life insurance companies and other product issuers once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party.

## How We Use Your Personal Information

Primarily, your personal information is used in order to provide comprehensive and/or limited financial planning services to you. We may also use the information that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed.

Should you choose not to provide certain personal information or provide incorrect information, the advice and/or recommendations may be inappropriate or inadequate.

From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

We may disclose your Personal Information to:

- Superannuation fund trustees,
- Insurance providers,
- Product issuers and other service providers for the purpose of giving effect to your statement of advice and the recommendations made by us.
- Compliance consultants to ensure that our representatives are meeting our compliance standards;
- Paraplanning contractors or temporary staff to handle workloads during peak periods;
- Your professional advisers, including your solicitor or accountant as authorised by you;
- I.T. service providers to maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems;
- Government and regulatory authorities and other organisations, as required or authorised by law, for example, to government or regulatory bodies for the purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.
- Where you have given your consent including your legal advisers.

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

The Corporations Act has provided the Australian Securities and Investment Commission (ASIC) with the authority to inspect certain personal information that is kept on our files about you.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

## How We Store and Secure Your Personal Information

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours.

Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

## **Ensure Your Personal Information Is Correct**

Nest Financial Services Pty Ltd takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

## **Access to Your Personal Information**

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

## **Dealing with us Anonymously**

Where lawful and practicable to do so you can deal with us anonymously e.g. general inquiries about the services we can offer you.

## **Sending Data Overseas**

Nest Financial Services Pty Ltd takes its obligations to protect your information seriously. When we operate throughout Australia and overseas, as part of our operations some uses and disclosures of your information may occur outside your State or Territory and / or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

## Complaints Resolutions

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

## Our Website

Nest Financial Services Pty Ltd website provides links to third party websites. The use of your information by these third party sites is not within the control of Nest Financial Services Pty Ltd and we cannot accept responsibility for the conduct of these organisations.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

### Contact Details

<b>Privacy Officer:</b>	Brad Williams
<b>Address:</b>	Nest Financial Services Pty Ltd 119 Windsor Crescent Surrey Hills, Victoria, 3127
<b>Telephone :</b>	(03) 9899 4420
<b>Facsimile:</b>	(03) 8610 1033
<b>E-mail:</b>	<a href="mailto:bwilliams@nestfinancial.com.au">bwilliams@nestfinancial.com.au</a>