



## **Privacy Policy**

February 2017

## 1. Akambo Pty Ltd t/a Accountants Private Advice Privacy Policy

Your personal information is protected and Akambo Pty Ltd abides by the Australian Privacy Principles established under the Privacy Act, 1988. A summary of the Australian Privacy Principles is available by contacting our office.

This policy applies to Akambo Pty Ltd t/a Accountants Private Advice. This policy explains how we will use and manage your personal information. It also describes in general terms, how personal information is collected, the sorts of personal information held as well as the purposes for which it may be used and disclosed.

Akambo Pty Ltd t/a Accountants Private Advice will review and update this policy from time to time to make sure it remains appropriate should there be a material change to our business operations or law. We reserve the right to notify you by posting an updated version of the policy on our website. We will be governed by the most current Akambo Pty Ltd Privacy Policy regardless of whether or not we have given you specific notice of any change.

## 2. The kinds of personal information that we collect

As a financial planning organisation we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- Employment details and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- Details of your investment preferences and aversion or tolerance to risk;
- Information about your employment history, employment circumstances, family commitments and social security eligibility;
- Details of your personal, investment and business objectives in the near and longer terms

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

### 3. How we collect personal information

Generally collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

### 4. The purposes for which we collect personal information

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- The preparation of your financial plan;
- The provision of financial planning advice to you as requested by you or from time to time as we believe appropriate;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- The potential dissemination of information to a new Financial Services Licence in the event a representative changes to such a new licence in accordance to terms of his/her employment.

### 5. Dealing with personal information

We will not use or disclose Personal Information collected by us for any purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or representatives who will be your primary point of contact

with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such 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. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

## 6. How we keep personal information secure and current

Your personal information is generally held in your client file. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets, which are locked out of hours. All record movements off premises are recorded in a central register. Access to our premises is controlled. All computer based information is protected through the use of access passwords on each computer and screen saver passwords. Data is backed up each evening and stored securely off site.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

We do not currently disclose your personal information overseas.

## 7. Accessing your personal information

You may at any time, by contacting us, request access to your personal information and we will reasonably provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will endeavour to ensure that, at all times, the personal information about you, which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your Request is urgent please indicate this clearly.

## 8. Anonymity

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, such as general details about our products, however in most cases it will be impracticable for us to assist you if you remain anonymous or use a pseudonym.

## 9. Privacy enquiries and complaints

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Compliance Manager. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

### AKAMBO PTY LTD T/A ACCOUNTANTS PRIVATE ADVICE - CONTACT DETAILS

Compliance Manager:

Address: Level 14, 379 Collins Street Melbourne, Victoria, 3000

Telephone: 03 9602 3233

Facsimile: 03 9602 5009

e-mail: [compliance@akamboprivate.com](mailto:compliance@akamboprivate.com)

### OFFICE OF THE VICTORIAN PRIVACY COMMISSIONER

Privacy and Data Protection Victoria

Address: Level 6 121 Exhibition Street Melbourne, Victoria, 3000

Telephone: 1300 666 444

Facsimile: 1300 666 445

e-mail: [enquiries@privacy.vic.gov.au](mailto:enquiries@privacy.vic.gov.au)