

Privacy Policy

1 Overview

At Quadrant Wealth Pty Ltd your privacy is important to us and our Authorised Representatives and we are committed to protecting your privacy.

The collection of personal information about individuals by organisations is governed by the Privacy Act 1988 (the Privacy Act) which contains a national scheme for the collection, use, correction, disclosure and transfer of personal information by organisations in the private sector.

Protecting client's privacy is very important to us. As part of our commitment to ensuring the safety of our client's private and confidential information and as a mechanism to ensure our compliance with the Privacy Act, we have established and implemented a Privacy Policy (the Policy).

Purpose

The Policy explains our policies and practices with respect to the collection and management of personal information we collect from you.

The Privacy Act requires us to handle your personal information in accordance with a set of principles, known as the Australian Privacy Principles (APPs). Those Principles and our approach to those Principles are set out below.

Scope

The Policy applies to Quadrant Wealth Pty Ltd, ABN 94 914 524 060, Australian Financial Service Licence (AFSL) Number 507683 and all its related companies together referred to in this Policy as "Quadrant Wealth", "us", "our", or "we".

2 Collection

What information do we collect?

We will collect and hold your personal information for the purposes of:

- Providing Financial Advisory services to you
- Providing recommendations in relation to Investment Products
- Investment in, managing and administering investment products and services on your behalf
- Letting you know about our other products and services.

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

- name
- e-mail address
- residential and/or postal address
- date of birth

- contact details
- gender
- tax residency
- occupation
- qualifications
- bank account details
- financial details
- employer
- tax file number (TFN).

Much of this information is collected through application forms, the use of our online facilities or through ongoing communications with you.

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

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

- personal health information from you when applying for insurance
- personal health information from medical practitioners when you are making a claim
- income information from employers in instances where you are applying for additional insurance protection or salary continuance insurance
- details of your dependents as defined at section 10 of the Superannuation Industry (Supervision) Act 1993, for the purposes of paying benefits in the event of your death.

We will always seek your consent before collecting this kind of sensitive information.

We may also need to collect information from third parties. For example, we may need to collect information from your representatives (accountant, Mortgage broker, legal adviser etc.), product issuer and employer.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information. For example, in addition to obtaining personal information from you, whenever you acquire a new product or service from us, we will need to obtain certain documentary evidence from you as to your identity. Such evidence may include items such as a certified copy of your driver's licence, passport, or birth certificate.

We are also required under the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006, and its corresponding rules and regulations, to implement client identification and verification processes before providing certain services; and the obligation is ongoing where you choose to engage us for ongoing advice. We may need you to present identification documents such as a passport and/or driver's licence and documents to verify related entities in order to meet our obligations.

In addition, we may also need to collect other personal information under some laws. These include the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Corporations Act 2001 (Cth), the Insurance Contracts Act 1984 (Cth), the National Consumer Credit Protection Act 2009 (Cth), the Income Tax Assessment Act 1936 (Cth), and the Tax Laws Amendment (Implementation of the FATCA Agreement - U.S Foreign Account Tax Compliance Act) Act 2014 and (Implementation of the Common Reporting Standard) Act 2016, Act.

What if you do not give us the information we request?

The information that we seek to collect about you will depend on the products or services that we provide. You have the right to remain anonymous and or not to provide us with any or all of your personal information. However, if you do not give us the information that we ask for, or the information you provide is incomplete or inaccurate, this may:

- prevent or limit the quality of advice we provide to you
- prevent or delay the processing of an application or any claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact on the taxation treatment of your account.

3 Use of information

How do we use the information that we collect from you?

We use your personal information for the purposes for which it has been obtained. We collect your personal information so that we are able to act on your request, such as:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits
- report the investment performance of your account
- keep you up to date on other suitable services offered by us

Personal information will also be used where you have consented to such disclosure or where it is required or authorised under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

4 Disclosure

Who do we give information to?

We may provide your information to external parties. 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 often disclose your personal information include:

- our employees, agents, contractors, individuals or organisations who assist us to provide our services, including those from whom we obtain quotations, software providers, IT services and hosting, cloud storage providers, marketing, communication, administration and paraplaning services, temporary staff as required, accountants, legal advisers, compliance consultants and auditors
- insurers, re-insurers, and health care providers, including information about your health, where you have applied for insurance cover or made a claim, including information about your health
- any organisations involved in providing, managing, or administering investment products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers or mail houses
- your employer (relates only to employer sponsored superannuation arrangements)
- any fund (administrator or trustee) 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 nominated representatives including, but not limited to, your legal advisor, accountant, auditor, mortgage broker, family members, executor, administrator, guardian, trustee or attorney
- your legal 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
- any financial institution who holds an account for you
- any professional advisers appointed by Quadrant Wealth Pty Ltd.
- businesses that may have referred you to us (for example your lawyer)
- where we are permitted to disclose the information under the Privacy Act
- other companies or individuals, in the event of a proposed or actual corporate sale, merger, reorganisation, dissolution or similar event, which may include the transfer of business assets, such as personal information

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office)
- 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 will also disclose your information if you give your consent.

Will my information be disclosed outside Australia and use third party applications and service providers?

We hold your personal information in a combination of secure computer storage facilities, paper-based files, and other formats such as secure cloud storage. Your information may be accessed outside of Australia by Quadrant

Wealth Representatives and employees, for example, when they are on holidays. Quadrant Wealth also utilises information technology providers for the storage of client files, data, information, obtaining consent and interactions such as emails.

In order to provide our services, we may use or recommend the use of third-party applications or service providers, which may collect your personal information, or we may be required to disclose your personal information to provide our services.

We may disclose your personal information overseas as we engage the services of these providers, who may be based in Australia or overseas, and have all or part of their operations overseas, store data overseas, access services overseas or utilise third parties who are overseas.

Overseas locations of organisations, data centres and third parties may include, but are not limited to, USA, member states of the European Union, United Kingdom, Taiwan, Singapore, Malaysia, Hong Kong, Japan, South Korea, Philippines, South Africa, New Zealand, Canada, Brazil, Chile and the United Arab Emirates.

Quadrant Wealth maintains an Outsourcing Policy when selecting service providers to ensure quality providers are selected and that their privacy policy aligns with our philosophy of protecting our clients' privacy. We generally require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles.

We provide a list below of the third-party service providers and third-party applications we may use or recommend the use of, including links to their privacy policy and where available, their data centre locations.

- Microsoft OneDrive (Cloud File Storage and Business Applications)
<https://privacy.microsoft.com/en-us/privacystatement>
<https://docs.microsoft.com/en-us/office365/enterprise/o365-data-locations>
- AdviserLogic Morningstar (Customer Relationship Management, Portfolio Reporting and Financial Planning Software, and Cloud File Storage)
<https://www.morningstar.com/company/privacy-policy#privacypolicyau>
- iFactFind (Client engagement software)
<https://ifactfind.com.au/privacy-policy.html>
<https://ifactfind.com.au/terms-of-use.html>
<https://ifactfind.com.au/saas-agreement.html>
- DocuSign
<https://www.docusign.com/company/privacy-policy>

5 Access and correction of information

Can I access my information and what if it is incorrect?

You may gain access to the information that Quadrant Wealth has collected about you, by contacting your adviser or the person named below. We will not charge you for responding to such a request unless we incur costs in providing the information. We will inform you of any costs prior to proceeding.

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 where possible, explain the reasons why.

It is important that the information we hold about you and any related entity is accurate, complete and current, as this information may form the basis on which we provide our services and allows us to provide these services efficiently. We encourage you to correct, modify or update the information we have for you or a related entity by contacting your adviser or the person named below. Information can be provided to your adviser by telephone, mail, email, electronic form, or any other agreed means between you and your adviser.

6 Protection of the personal and sensitive information that we hold

How do we protect the security of your information?

We have practices and procedures in place to safeguard your privacy. Your personal information is stored on highly secure cloud servers with strict password access. The people who handle your personal information for us have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse to the best of their ability.

Risks of using the internet

Unfortunately, the transmission of any data, including your personal information, over the internet is not 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 are undertaken knowing this risk. Just 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 storage or portable devices, such as your mobile phone are secure.

Cookies

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie, and you may elect to either accept it or not. If

you wish not to accept a cookie; this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

7 Your rights if you are in the European Union (EU)

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
- restrict, object, or withdraw your consent to the processing of your personal information

If you require more information about your eligibility to and or these rights, please let us know.

8 Complaints

If you have any questions about our Privacy Policy, please contact us on the details listed below.

You may make a complaint about Quadrant Wealth's handling of your personal information, or in relation to your dealings with us about your personal information, by contacting the details below.

Quadrant Wealth handles any complaints received according to its Dispute Resolution Policy. Your rights are detailed in our Financial Services Guide (FSG).

In the first instance, we suggest you speak directly to your adviser and have an honest discussion with them about your complaint or concerns. You also have the option of writing to or emailing your adviser.

Where you are uncomfortable with this approach, are not sure who to contact or you have not been able to satisfactorily resolve the matter with your adviser, please contact our office on 02 9386 9156 and speak with the Complaints Officer. In order to efficiently manage your complaint, we may request or assist you to detail your specific concerns in writing.

Generally, we will provide you with a written acknowledgement of your complaint within 48 hours and then provide a formal response to your complaint within 45 business days.

If you are not satisfied with the response you receive or the complaint cannot be resolved within the 45 business days, you have the right to contact the Australian Financial Complaints Authority (AFCA). AFCA are a free and independent, ASIC-approved external dispute resolution body of which we are a member. Their contact details are as follows:

Address: GPO Box 3
Melbourne VIC 3001
Phone: 1800 931 678 (free call)

Email: info@afca.org.au

Website: www.afca.org.au

You may also contact the Australian Securities and Investments Commission (ASIC) by phoning 1300 300 630 to make a complaint and obtain information about your rights.

In addition, under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information, by contacting the Commissioner at, GPO Box 5218, Sydney NSW 2001, 1300 363 992 or enquiries@oaic.gov.au.

If your complaint requires us to contact a third party, we may need to give some of the information contained in your complaint to that party.

9 Termination of services

We may be required to maintain your personal information even after our relationship has ended to assist you in responding to queries you may have or assisting you to transition your financial affairs or to meet our regulatory and or document retention requirements. Once our obligations have ended (usually between seven to ten years), you can request for us to delete your personal information by contacting your adviser or the person named below. Otherwise, we will only keep information for as long as is reasonably necessary, after which we may delete your personal information.

We are required under the current legislation to hold personal information for seven years following the cessation of your relationship with us. In some instances, the information we hold may be required to be held for longer.

10 Client Consent

By accessing our website, www.quadrantwealth.com.au, contacting us or by asking us to assist you, you consent to the collection and use of the information you have provided us with for the purposes described in this policy.

Where you have provided information about your partner, a related entity or other persons relevant to you, for the services you have engaged us for, please make these people aware of the information you have provided and our Privacy Policy. Where you have provided personal information about children under the age of 16, as their parent or guardian in this capacity, you have given your consent for us to hold this information.

11 How do I contact the Privacy Officer?

If you have any questions about this Privacy Policy, please contact:

Privacy Officer
C/- Quadrant Wealth Pty Ltd
PO Box 409
Bondi Junction, NSW, 1355

Tel: (02) 9386 9156

Email: david@quadrantwealth.com.au