



SMITH COFFEY



YOUR PRIVACY

INTRODUCTION

Smith Coffey has always maintained its own strict privacy rules, so the Privacy Act 1988 (Commonwealth) has simply reinforced our past and current practices in that your personal information is only used for its intended purpose, the provision of our services to you.

Smith Coffey is bound by the National Privacy Principles under the Privacy Act. We are committed to ensuring that all our business dealings comply with the National Privacy Principles and acknowledge the importance of keeping personal information confidential and secure.

We support:

- fair and open collection practices;
- processes that ensure information is accurate, complete and current;
- your rights to see and, where necessary, correct information about yourself;
- limiting the use of personal information to purposes that are authorised or that you would reasonably expect.

Smith Coffey will update this privacy policy as required. If it is changed, the changes will be posted on our website www.smithcoffey.com.au so that you are always aware of the sort of information collected, how the information may be used, and under what circumstances it may be disclosed by us.

Please note that if at any time Smith Coffey is required by law to release information about you or your organisation, Smith Coffey must cooperate fully.

This policy explains how we manage your personal information. It details the type of personal information we collect, how we may use that information, to whom we allow access and how we protect it.

HOW AND WHY WE COLLECT PERSONAL INFORMATION

Smith Coffey collects personal information from you when you engage us so that we may provide you with advice, recommendations and services relating to the following:

- **Financial Planning**
- **Investments**
- **Personal and Business Risk Management**
- **Retirement Planning**
- **Estate Planning**

- **Superannuation**
- **Salary Packaging**
- **Tax and Accounting**
- **Practice Management**
- **General Financial advice**
- **Personal Portfolio Service**
- **Banking and Finance**

The personal information we collect may include your name, contact details, age, financial details and other information that is relevant to the services we provide for you, or necessary to carry out your instructions.

We will try to collect information from you directly wherever possible. Where we collect information about you from someone else (eg. past or present accountant or financial planner, bankers, insurers) we will obtain your consent.

You are under no obligation to give us personal information about you or anyone else. However, if you do not provide the information we request, it may affect our ability to provide you with and administer our services.

HOW WE USE YOUR PERSONAL INFORMATION

Use of personal information refers to the handling of personal information within Smith Coffey.

We may use your personal information to:

- provide you with a specific service (eg. We may use the information you provide us to complete your annual tax return, provide financial advice or complete applications for financial products on your behalf)
- administer and manage the services we provide.
- provide you with information about other services that may be of benefit to you, such as general insurance services.

DISCLOSURE OF YOUR PERSONAL INFORMATION TO OTHER PARTIES

We disclose personal information when we release information to others outside Smith Coffey.

Smith Coffey will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you unless:

- it is related to the primary purpose of collection and where you should reasonably expect us to; or

- you have consented for us to use or disclose the information; or
- we suspect unlawful activity; or
- where we are so required or authorised by law.

We may disclose your personal information:

- to government agencies including the Australian Taxation Office and ASIC, as part of our regulatory or statutory obligations;
- where the law requires us or permits us to do so (such as enforcement agencies);
- to our service providers (as is strictly necessary) to enable them to provide services to us, for example, auditors, legal and financial consultants
- to financial product providers, for example insurance companies and fund managers, in order to carry out your instructions.

In such cases we will ensure that our service and financial providers also respect your privacy.

QUALITY OF YOUR PERSONAL INFORMATION

We will take all reasonable steps to ensure that the personal information we collect, use or disclose is accurate, complete and current.

PROTECTING YOUR PERSONAL INFORMATION

We will take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure.

Your personal information is stored securely whether in an electronic or physical form. Your information is stored in secured premises and in electronic databases, which are password and access-level protected.

Some information is kept by Smith Coffey for a number of years to comply with legal requirements. Any personal information that is no longer needed for business purposes is disposed of securely.

OPENNESS

We will maintain and review clearly expressed policies on our management of personal information and make this readily available through this Privacy Policy.

We will take reasonable steps, on request, to let you know what sort of personal information we hold, for what purposes, and how we collect, hold, use and disclose that information.

HOW TO ACCESS AND CORRECT YOUR PERSONAL INFORMATION

You have a right to ask us what sort of personal information we hold about you and how we collect it, hold it and use it.

We will provide you with access to personal information on request except where it:

- may have an unreasonable impact upon the privacy of others;
- would be unduly onerous for us;
- is frivolous or vexatious;
- relates to existing or anticipated legal proceedings with the person who is the subject of the information and would not be accessible through discovery;
- may reveal our intentions and prejudice negotiations with you;
- may prejudice investigation of any possible unlawful activity;
- would be unlawful or denial of access is allowed by law; or
- may damage national security.

Where we have declined to provide information on the above grounds and you are not satisfied, then you can use our Complaints Resolution Procedure.

No fee will be charged for an access request. You may be charged the reasonable expenses incurred in giving you any information (such as search and photocopying costs).

We will take all reasonable steps to ensure that the information is correct, accurate and current.

We will correct personal information held if we discover, or you are able to show us, that it is incorrect. If you ask us to correct it and we do not agree that it is wrong, we will explain our refusal to correct. In these circumstances, if you ask we will keep a statement with a record of the information you regard as inaccurate or out-of-date.

IDENTIFIERS

We will not use identifiers assigned by the Government, such as your tax file number, medicare number or pension card number, for our own file recording purposes.

TRANSFERRING YOUR PERSONAL INFORMATION INTERNATIONALLY

We will not transfer personal information to someone in a foreign country, unless you have consented to the transfer.

SENSITIVE INFORMATION

Sensitive information is information about your health, your racial or ethnic origin, political opinion, religious or philosophical beliefs or affiliations, membership of political, professional or trade associations, membership of a trade union, criminal record or sexual orientation.

We will only collect sensitive information with your consent unless the collection is required by law or to establish, exercise or defend a legal or equitable claim; or it is necessary to prevent or lessen a serious or imminent threat to the life or health of the person who is the subject of the information.

ANONYMITY

If we can (and if you want to) we will deal with you anonymously.

Where it is lawful and practicable, we will allow you to enter into transactions with us on an anonymous basis.

CONTACTING SMITH COFFEY

If you have any further questions about Smith Coffey's Privacy Policy please contact our Privacy Officer, Ray Wilson or your Smith Coffey Consultant on (08) 9388 2833 or write to us via email at info@smithcoffey.com.au or to Smith Coffey, 20 Nicholson Rd, Subiaco, WA 6008.



ACKNOWLEDGEMENT AND CONSENT

I/We acknowledge having read and understood the Smith Coffey Privacy Policy and I/we consent to my/our personal information being collected, used and disclosed in accordance with the terms of this policy.

Signature

Signature

Name

Name

Date

Date

Smith Coffey Financial Management Pty Ltd

A.C.N. 008 812 226
as trustee for the Smith Coffey Trust
A.B.N. 28 754 975 431

Smith Coffey Securities Pty Ltd

A.C.N. 008 812 208
AFS Licence No: 237971
A.B.N. 19 008 812 208

Smith Coffey Pty Ltd

A.C.N. 008 819 458
as trustee for the Bon Unit Trust
AFS Licence No: 237972
A.B.N. 72 940 948 949