

Smith Coffey Tax & Accounting Pty Ltd

A.C.N. 008 812 226

as trustee for the Smith Coffey Trust

A.B.N. 28 754 975 431

Smith Coffey Pty Ltd

A.C.N. 008 819 458

as trustee for the Bon Unit Trust

ACL/AFSL No: 237972

A.B.N. 72 940 948 949

Smith Coffey Securities Pty Ltd

A.C.N. 008 812 208

AFS Licence No: 237971

A.B.N. 19 008 812 208

Introduction

Smith Coffey Tax & Accounting Pty Ltd, Smith Coffey Pty Ltd and Smith Coffey Securities Pty Ltd (referred to in this document collectively as “**Smith Coffey**”) have always maintained their 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:

- the process of operating our businesses which provide you with our products and services; and
- identifying and offering you products and services that we believe may interest you.

Smith Coffey is bound by the Australian Privacy Principles under the Federal 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; and
- 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 can always be 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 comply with its legal obligations.

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.

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**
- **Retirement Planning**
- **Banking and Finance**
- **Estate Planning**
- **Superannuation**
- **Salary Packaging**
- **Tax and Accounting**
- **Practice Management**
- **General Financial advice**
- **Personal Portfolio Service**
- **Personal and Business Risk Management**

We may use the information for the purpose of:

- Establishing details of existing products that you have;
- Liaising with product providers;
- Liaising with Government Bodies such as the ATO and ASIC;
- Preparing Tax Returns;
- Attempting to identify and bring to your attention products and services that may be appropriate for you, or of interest to you;
- Completing application forms;
- Assessing, processing and managing your application to work with us;
- Maintaining records and complying with our legal obligations;
- Conducting any professional quality control review program;
- Managing our business operations such as maintaining secure IT systems;
- Providing, maintaining and improving our website and services;
- Distributing our newsletters and other communications either ourselves or with the assistance of third party service providers;
- Obtaining analytical data;
- Carrying out reasonably related secondary purposes;
- Carrying out any other activity that you authorised us to do; and/or
- Carrying out any other activity for which the information was collected

What Information is Collected

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. We are an Australian Financial Services Licensee ("AFSL") as well as an Australian Credit Licensee ("ACL"). When we provide you with financial services or credit services, we may be required by the Corporations Act 2001, National Consumer Credit Protection Act 2009 and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to, your:

- Name, date of birth, contact details and tax file number;
- Employment details and employment history;
- Financial details;
- Details of your investment preferences and attitude or tolerance to investment and financial risk;
- Information about your financial needs and objectives;
- Information about your employment history, employment circumstances, family commitments and social security eligibility.

Sensitive Information

We may also need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health information, racial information, genetic information, etc.

We will only collect and use sensitive information that is reasonably necessary for us to provide our services to you or to identify and bring to your attention products and services that may be appropriate for you, or of interest to you.

How Information is Collected

We collect personal and sensitive information in a number of ways, including:

- Directly from you such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites;
- Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information;
- Through our website. As commonly done by other sites, our server automatically collects information about your use of our website and other services (Site Data). Broadly, Site Data includes the types of browser you are using, access times, your IP address, the URL you have come from (including the time spent at that URL, cookies and your domain type and server);
- When you send us an email, purchase our goods and/or services, register to receive our newsletters or other communications, apply for a job, enter into one of our competitions, visit our website or otherwise interact with us;
- Through a range of social media channels ("Social Media") which are used to distribute news, announcements, promotions and to address community enquiries. If you submit or post comments, images, tweets, recordings or other personal content for public display on Social Media, that information may be available for anyone in the world to read, view or comment on. We encourage you to read the separate Social Media privacy policies which relates to their use. We are not responsible to you for the information handling practices of Social Media.
- Through third party vendors, for example, via Google, who show Smith Coffey promotional materials on sites on the internet, use cookies to direct promotional materials to you based on your prior visits to our website. You may opt out of Google's use of cookies by visiting the Google advertising opt-out page.
<https://support.google.com/ads/answer/2662922?hl=en>

Recording and Transcribing Meetings and Calls

We may record and transcribe meetings and telephone/online calls to: (a) prepare accurate file notes and advice documents; (b) deliver and improve our services to you (including quality assurance); (c) manage complaints and dispute resolution; and (d) comply with our legal and regulatory record-keeping obligations as an Australian Financial Services Licensee and registered tax agent.

Consent and Withdrawal:

We will only record if all participants have provided consent. By signing this engagement, you provide enduring consent for recording and AI-assisted transcription for the above purposes. At the start of each recorded meeting or call, we will remind all participants that recording is proposed, and any participant may opt out immediately or at any time.

Service Providers and Overseas Disclosures:

We may engage reputable service providers to facilitate recording, transcription, and secure cloud storage. Some providers may be located, or may store or access data, outside Australia. We take reasonable steps to ensure such providers handle your information consistently with the Australian Privacy Principles by using contractual safeguards. Further details are available in our Privacy Policy.

Security and Retention:

Recordings and transcripts are protected by encryption and role-based access controls. We retain these only for the period needed to fulfill the purposes stated above and as required by law (typically up to seven years from creation or the conclusion of your engagement, unless a longer period is required for dispute resolution), after which they are securely deleted or de-identified.

Sensitive Information and TFNs:

Meetings may incidentally capture sensitive information or Tax File Numbers (TFNs). We handle TFNs in accordance with the Privacy (Tax File Number) Rule 2015 and apply enhanced protections to all sensitive information. Please avoid stating your TFN aloud unless necessary—we can arrange alternative secure methods of provision.

Access, Correction, Complaints:

You may request access to, or correction of, your personal information in recordings or transcripts. Our Privacy Policy explains how to make a privacy complaint and how it will be handled.

Legal Compliance:

We comply with applicable surveillance and listening device laws. For meetings or calls where participants may be in different Australian jurisdictions, we confirm all party consent at the outset and document it accordingly.

Acknowledgement:

We may specifically ask you to state the following at the beginning of any meeting or call: "I agree to the use of electronic signatures, recording of meetings and calls, and AI-assisted transcription for the purposes described above, and I have provided my personal email and mobile for this purpose". It forms part of your Terms of Engagement. If there is any inconsistency, this clause prevails to the extent required to comply with the Privacy Act and applicable surveillance laws.

Are You Obligated To Provide Us With Personal Information?

You are not required to provide us the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us you risk obtaining products or services that may not be appropriate or suitable for your needs and you may risk suffering a financial detriment or financial loss.

What Happens If We Obtain Information About You Which We Have Not Solicited?

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as possible.

How We Use Cookies

Cookies are small pieces of data stored on the web browser on your computer. Our website may store cookies on your web browser. The main reasons we store cookies are to:

- improve your website browsing experience;
- gather statistics on website usage; and
- enable us to present customised and appropriate messages to you.

You can set up most web browsers so you are notified when a cookie is received, so you can then either accept or reject it. You can also check the cookies stored by your web browser and remove any that you do not want.

If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites, then you may not be able to gain access to all the content and facilities of our website or linked sites.

Disclosure Of Your Personal Information To Other Parties

We may disclose your personal information to:

- Our representatives;
- The issuers of products and services that you have elected to acquire, vary or dispose of using our assistance;
- Parties who we think are necessary or convenient to provide services to you;
- Our external service providers [e.g. IT providers, professional advisers and contractors];
- Prospective entities interested in acquiring all or part of our business.

For example, information may be disclosed to the following parties:

- Product issuers and credit providers for the purpose of giving effect to the recommendations made by us, and other organisations who support the products and services we offer;
- Other parties involved in the administration of your financial/credit products or insurance cover (e.g. custodians, brokers, credit reporting bodies, actuaries, call centres, mail houses, product registries, any persons who propose to guarantee (or have guaranteed) repayment of any credit provided to you, mortgage insurers, claims assessors etc);
- Our external service providers (e.g. IT providers, professional advisers and contractors);
- Government and regulatory authorities and other organisations, as required or authorised by law;
- Any person considering acquiring, or acquiring an interest in our business;
- Suppliers and third parties that perform services for us in connection with our website and in connection with the sale and provision of our services, including third parties who provide marketing services.

Identifiers

Although 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, authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Cross-Border Disclosure Of Personal Information

We may transfer personal information to related bodies corporate or external service providers in locations outside Australia, including, but not limited to the EU, Sri Lanka, Ireland, New Zealand, South Africa, Thailand, United States, China, Poland, Philippines, in the course of storing that information and when using or disclosing it for one of the purposes referred to above. When transferring personal information to foreign jurisdictions, we will only permit the transfer of information once we have satisfied one of the criteria below:

- taking reasonable steps to seek to ensure the overseas recipient does not breach the APP in relation to the information; or
- forming a reasonable belief that the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APP protects your information and where there are mechanisms that you can access to take action to enforce those protections under the law or binding scheme; or
- we obtain your informed consent prior to disclosing your personal information overseas.

Storage And Security of Information

We store personal information in our computer database and in hard copy files. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for a period of not less than 7 years in order to comply with legislative and professional requirements.

Notifiable Data Breaches

We are required to notify you and the Office of the Australian Information Commissioner ("OAIC") of an eligible data breach. An eligible data breach happens if:

- there is unauthorised access to, unauthorised disclosure of, or loss of personal information held by us; and
- the access, disclosure or loss is likely to result in serious harm to you.

If you receive a statement of an eligible data breach from us, you should read and implement the recommendations about the steps you should take in response to the eligible data breach.

Access and Correction of Information

You may request access to the personal information we hold about you, and we will respond within a reasonable period after the request is made. Where we provide you access to such

information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.

We will take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, up-to-date, complete and relevant. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us and request that we correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice to that effect. You have a right to make a complaint if you disagree with our decisions in relation to these matters (see below).

Advertising and Analytics

Entities who provide us with advertising and marketing services may use cookies, web beacons and other technologies to collect information about your use of our website, products and services. This includes information such as your IP address, web browser, pages viewed. We may use this information for purposes including advertising, targeted marketing and for the purposes of analysis and data tracking.

Opting Out Of Promotion And Marketing

If you do not want to receive communications about our latest goods and / or services, you can opt out by contacting us using the contact details in the section of our website titled 'Contact Us'. In the absence of your opting out, we may use your information (including personal information) to provide you with current information about our products and services, offers and updates about our organisation. We may contact you by mail, email, SMS, social media and/or telephone.

Complaints

If you believe that we have breached the APP or disagree with a decision that we have made in relation to our Privacy Policy, you may lodge a complaint with us. To enable us to understand and deal with your complaint in a timely fashion you should set out a brief description of the reason for your complaint and what action or remedy you are seeking from us. Please address your complaint to:

The Compliance Manager
Smith Coffey
20 Nicholson Rd, Subiaco, WA 6008
Email: complaints@smithcoffey.com.au

Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

Contacting Smith Coffey

If you have any further questions about Smith Coffey's Privacy Policy please contact our Compliance Manager 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.