

## PRIVACY POLICY

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At Virtue & Partners we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

#### What information do we collect and how do we use it?

When we provide financial advice and services through our advisers, including personal and corporate risk management, wealth creation, retirement planning, access to associated services such as stockbroking and mortgages, we ask you for the information we need to provide the advice and services agreed upon. This can include a broad range of information ranging from your name, address, contact details and age to other information about your personal affairs including your financial circumstances, goals and strategies.

We provide the information that you provide to issuers, operators or providers of financial products or financial services such as insurance offices, superannuation funds, accountants or solicitors, appointed investment advisers, fund managers, banks, building societies and credit unions, Centrelink, friendly societies, Australian share registries and the Australian Taxation Office to enable them to assist with and/or implement any recommendations that you have previously authorised us to proceed with, on your behalf.

We also use your information to enable us to manage your ongoing requirements and our relationship with you, e.g. forwarding monthly updates on your portfolio, reviewing the performance of your investments, forwarding tax related information to your accountant for finalising annual tax returns. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

From time to time we will use your contact details to send you offers, updates, events, articles, newsletters or other information about products and services that we believe will be of interest to you. We may also send you regular updates by email or by post. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

We will collect your personal information directly from you where this is reasonable and practical. We gather this information either through applications or other forms that you complete, or by recording the information you provide via phone calls, interviews and other forms of communication.

We may also collect personal information from external sources. Examples of the people or organisations that may provide us with information are:

- employers, when a new employee joins their superannuation or insurance plan
- parents or guardians in respect of children
- people authorised by you (such as accountants)
- public sources of information (such as telephone directories)
- third-party brokers (such as insurance and mortgage brokers)

When we are provided with personal information about an individual from a third party, we seek to ensure the individual is made aware that we have done so, and of certain other matters including Virtue & Partners' identity and our contact details.

We may also use your information internally to help us improve our services and help resolve any problems.

### **What if you don't provide some information to us?**

You are not obliged to give us your personal information. However if you do not provide us with some or all of the information that we ask for, it may affect our ability to properly analyse your personal circumstances when you are seeking financial planning services which means we may not be able to provide you with the product or services that you want.

### **How do we hold and protect your information?**

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold your personal information in a combination of secure computer storage facilities and paper-based files stored inside locked cabinets. Electronic information held is password protected and firewalls are used to prevent electronic intrusion into our systems. Electronic information we hold is backed up daily and held by our external data storage provider.

We ensure that your information is safe by providing staff and financial advisers with training on our Privacy Policy and Procedures and instructing those who handle personal information to respect the confidentiality and privacy of your information. We maintain physical security over our paper and electronic data and premises, by using locks and secure computer storage facilities.

### **Will we disclose the information we collect to anyone?**

We do not sell, trade, or rent your personal information to others. The entities that we might share your personal information with vary according to the product or services involved but could include insurance offices, superannuation funds, accountants or solicitors, appointed investment advisers, fund managers, banks, building societies and credit unions, Centrelink, friendly societies, Australian share registries, the Australian Taxation Office and the Australian Securities and Investments Commission. We may need to provide your information to contractors who supply services to us, e.g. para-planners, accountants and data storage providers or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may also provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

We may disclose your information to recipients in England and/or New Zealand for the purpose of receiving or sending superannuation benefits. This would only happen with your prior approval and written consent.

### **How can you check, update or change the information we are holding?**

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please send us an email to [info@virtueandpartners.com.au](mailto:info@virtueandpartners.com.au).



We do not charge for receiving a request for access to personal information or for complying with a correction request. We may, however, charge you the costs associated with meeting your request, for example photocopying and postage costs, if any.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

### **What happens if you want to complain?**

If you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer at:

Virtue & Partners Privacy Officer  
PO Box 218  
Manly NSW 1655  
pH: (02) 9977 8800  
info@virtueandpartners.com.au

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 45 days of you making the complaint.

### **Your consent**

By asking us to assist with your financial planning, insurance or finance needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

### **Tell us what you think**

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact:

Virtue & Partners Privacy Officer  
PO Box 218  
Manly NSW 1655  
pH: (02) 9977 8800  
info@virtueandpartners.com.au

### **WEB DATA**

**Anonymous data** – We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

**Cookies** – In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. “Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.”

