

## Privacy Policy

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### Licensee

Phase3Wealth Pty Ltd atf P3W Trust  
(AFSL 537118 ACN 168 866 868)

### Contact Details

Level 5, 34 Charles St  
South Perth WA 6151  
Phone: 08 9367 3773

[www.phase3wealth.com.au](http://www.phase3wealth.com.au)

### P3W Privacy Policy

We understand that the privacy of your information is important to you, and we respect the confidentiality of the information that you provide to us. Protecting your information is an important part of maintaining trust between us and our clients.

This document provides information and details about how we manage the personal information that we collect, hold, use and disclose about individuals. We are bound by the Privacy Act and we manage and protect your personal information in accordance with the Australian Privacy Principles.

### Why we collect and use personal information

We collect, hold, use, and disclose personal information so we can provide you with financial products, advice, and service relevant to your needs. We may also collect, use, and disclose your information for related purposes such as:

- Complying with our legal obligations, such as verifying your identity.
- Assisting with your questions and complaints.
- Arranging for services to be provided by third parties.
- Internal operations, such as record keeping, data analytics, auditing, or training.

### What personal information we collect

We ask people for a range of personal information to assist us in providing relevant products and services. The information we collect could include (but is not limited to) your name, date of birth, contact details, financial information, employment details, residency and citizenship status. We may also collect the personal information of your family members where it is relevant to the advice being provided. We may also collect sensitive information about your medical history and their health and lifestyle to provide financial advice about life insurance products. In most instances, we collect personal information directly from that person when they:

- Complete a financial product or credit product application form,
- complete an identification form,
- complete data collection documentation,
- interact with an online interactive tool, such as a budget planner,
- provide documentation to us, or
- when you communicate with us in person, over the telephone, fax, email, internet or by using other electronic devices.

It's your choice whether to provide your personal information. You have the right to not provide personal information, including about your identity. However, in this case, your adviser will warn you about the possible consequences and how this may impact on the quality of the advice provided.

Your adviser may also decline to provide advice if they feel they have insufficient information to proceed. In some instances, we will decline to provide services or advice if we feel we have insufficient information for the scope of the service or advice requested.

Furthermore, in some circumstances the law requires us to obtain and verify details of photographic and nonphotographic identification documents.

## **Cookies and web technologies we use**

Some personal information may be collected automatically, without your knowledge, whilst navigating through and interacting with the content of our websites. The electronic methods of collection we use include cookies, log files and web beacons.

Cookies are a small text or pixel file stored on your device that records information about your visit to our websites. We use cookies to improve your website experience, to serve you with relevant information and to manage your access to certain parts of our websites. You can choose if and how a cookie will be accepted by changing your browser settings; but please be aware that this may affect your access to some parts of our websites.

Log files contain information about the devices and browsers used to access our websites and help us to diagnose problems, analyse trends, administer the site or mobile application.

Web beacons are small pixel files that help us better manage content on our websites by allowing us to understand usage patterns, fix issues, and improve the products and services offered to you on our websites.

The information we collect by these electronic means is generally not stored for long – they are temporary records – and can include device-specific data or log data such as your IP address, device screen size, device type, browser information, referring domain, pages visited, the date and time website pages were visited, and geographic location (country only).

## **Updating and accessing personal information**

We will update your personal information if you contact us. In most cases, you can update your personal information over the phone or electronically.

You can request access to personal information we hold. There may be a cost

involved with locating, copying, or sending you the information you request. The cost will be discussed and agreed with you at the time. There may be circumstances where we refuse to provide you with the information you request, for example when the information is commercially sensitive. In these situations, we will inform you and provide an explanation as to why.

We will deal with requests for access to your personal information as soon as possible and aim to respond within 30 days. The time we require will depend on the type of information requested.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may only be able to provide you with limited information or services. In many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

## **Who we share personal information with**

On occasion, we may share your personal information with other entities both within and outside of Phase3Wealth. This will vary according to the product or service involved, but could include:

- Any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney.
- Financial product and service providers, including financial planning software providers and paraplanners.
- Medical practitioners and health service providers, such as pathology services.
- Companies involved in the payments system including financial institutions, merchants and payment organisations.
- Organisations who assist us with certain business functions, such as auditors, compliance consultants, information and communication technology support.

- Our solicitors, our insurers, courts, tribunals, and dispute resolution organisations.
- Other organisations who provide us with products and services so that they may provide their products and services to you or contact you on our behalf.
- Anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information to (for example, law enforcement agencies, Australian and international government, and regulatory authorities).
- We may also disclose your information to a third party where you have given your consent or where you would reasonably expect us to disclose your information to that third party.

The only circumstances in which we would collect, use, or disclose your government related identifiers is where we are required or authorised by law to do so. For example, we may be required to disclose your Tax File Number (TFN) to the Australian Taxation Office, a superannuation or retirement income product provider. Likewise, we may need to disclose your Medicare number to Centrelink to assess your social security eligibility. Drivers licence numbers and passport numbers may also be collected when we are required to verify your identity.

Personal information collected may also be used for direct marketing purposes to promote events, products or services that may be of relevance to you. Please contact us should you wish not to receive direct marketing.

### **Disclosure of personal information overseas**

Some of the organisations to which we may disclose your personal information may have operations located outside of Australia. The most common example of when we share your personal information overseas is when we work with overseas service providers who prepare financial advice documents. When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in

place. All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act. Personal information is generally hosted on servers located in Australia.

### **How we protect personal information**

We strive to ensure that the personal information that you provide to us is stored safely and securely. We take several precautions to protect the personal information we hold about you from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. Some of these include;

- Educating our staff and representatives about how to protect your personal information and updating them about cybersecurity developments, threats, and scams,
- requiring our staff and representatives to use passwords when accessing our systems,
- where appropriate, using strict confidentiality arrangements restricting third parties' use or disclose of personal information for any unauthorised purposes,
- employing physical and electronic means, including access controls (as required) to protect against unauthorised access to buildings,
- employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons, malware and viruses from entering our systems,
- some of the systems we use are on dedicated secure networks or transmit electronic data via encryption, and
- providing secure storage for physical records and securing paper files in locked cabinets and physical access restrictions.

Where personal information is no longer required, we take steps to de-identify or destroy the information in a secure manner.