

Accord Group (WA) Pty Ltd
CERTIFIED PRACTISING ACCOUNTANTS

ABN: 96 210 970 944

William Murray House
92 Wray Avenue
FREMANTLE WA 6160
PO Box 236
FREMANTLE WA 695

Email: accordwa@accordwa.com.au
Telephone: (08) 9430 5559
Facsimile: (08) 9336 1192

Accord Group Privacy Policy



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Author: Accord Group (WA) Pty Ltd

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1. Introduction

Accord Group is committed to ensuring the confidentiality and security of your personal information, including your sensitive and credit information. This Privacy Policy applies to Accord Group (WA) Pty Ltd and any of its related entities (referred to as 'Accord Group', 'we', 'our', 'us') and covers all of the corporate group's operations and functions.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by Accord Group must comply with this Privacy Policy. Accord Group makes this Policy available free of charge and can be downloaded from www.accordwa.com.au.

This Policy outlines Accord Group's obligations to manage and protect personal information. Accord Group is bound by the Australian Privacy Principles ('APPs'), the Credit Reporting Privacy Code ('the Code') and the Privacy Act 1988 ('Privacy Act'). This Policy also outlines Accord Group's practices and procedures that ensure compliance with the Privacy Act, APPs and the Code.

In this Privacy Policy:

- 'Credit information' includes information that we have obtained from Third Parties, including individuals, credit providers and credit reporting bodies ('CRBs');
- 'Disclosing' information means providing information to persons outside Accord Group;
- 'Individual' means any person whose personal information we collect, use or disclose.
- 'Personal information' means information or an opinion relating to an individual, which can be used to identify that individual;
- 'Privacy Officer' means the contact person within Accord Group for questions and complaints regarding Accord Group's handling of personal information;
- 'Sensitive information' is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information;
- 'Use' of information means use of information within Accord Group.

2. What kind of personal information do we collect and hold?

Accord Group is required under various legislation and codes of practice to collect certain information in order to provide our range of wealth management, financial planning, stockbroking, lending and personal risk services. We may collect and hold the following kinds of personal information about individuals:

- personal details, including name, address, contact details, date of birth, marital status, dependents and employment details;
- details of investments including amounts invested, investor numbers and bank account details;

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- personal goals, objectives and risk profiles;
- insurance policy details, including life, trauma, income protection and general insurance;
- estate planning details, including status of wills, executors, beneficiaries and powers of attorney;
- taxation information including tax file numbers;
- Centrelink details, including benefit types and reference number;
- health information, including current health conditions, smoker status and medical history;
- sexual orientation and history for insurance application purposes;
- professional/trade memberships, political beliefs and ethnic origins;
- financial and credit information, including:
 - assets, liabilities, income and expenses;
 - information about an individual's consumer credit liabilities;
 - information about an individual's repayment history;
 - the type and amount of credit sought by an individual in an application;
 - whether the individual is 60 days or more overdue in making a repayment of \$150 or more;
 - whether the individual has repaid overdue payments;
 - information about new credit arrangements the individual has entered into as a result of defaulting in repayments;
 - information about court judgements against the individual in relation to credit;
 - publicly available information that relates to the individual's credit worthiness;
 - information recorded in the National Personal Insolvency Index about the individual;
 - our opinion as to whether the individual has committed a serious credit infringement;
 - any other personal information that may impact an assessment of the individual's credit worthiness; and
- any other information that is relevant to the services that we provide.

3. How we collect personal information

We generally collect personal information directly from the individual. For example, personal information will be collected when an individual fills out application forms, meets with an advisor, visits our website, or sends us correspondence. Sometimes we may collect personal information from a third party, such as financial institution, a credit provider, or a credit reporting body ('CRB').

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When we are provided with personal information from a third party, we will take reasonable steps to ensure that the individual is made aware of the matters set out in this Privacy Policy.

Our ability to provide individuals with comprehensive and quality services is reliant on us obtaining certain personal information. If individuals do not provide us with the information we request, we may elect to terminate our relationship with the individual as it may jeopardise our ability to provide a complete, accurate and comprehensive service.

Accord Group does not give individuals the option of dealing with them anonymously, or under a pseudonym. This is because it is impractical, and in some circumstances illegal, for Accord Group to deal with individuals who are not identified.

4. Unsolicited personal information

Accord Group may receive unsolicited personal information about individuals. If possible, Accord Group will return the unsolicited personal information to the person who provided it. In all other cases, we destroy the information, unless the personal information is relevant to Accord Group's purposes for collecting personal information.

5. About whom do we collect personal information?

We may collect personal information about the following individuals:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

6. Website collection

We collect personal information from our website (www.accordwa.com.au) when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Cookies allow us to track usage patterns so that we can measure the level of interest in various areas of our site. Information collected through such analysis is anonymous.

7. Why do we collect and hold personal information?

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We may collect and hold information about individuals for the following purposes:

- assisting Accord Group in providing wealth management, financial planning, personal risk, lending and stockbroking services;
- completion of documentation and application forms;
- provision of other services to assist in meeting your requirements, goals and objectives;
- to comply with relevant laws, regulations and other legal obligations, including anti-money laundering legislation
- managing credit or collecting overdue payments;
- to provide individuals with information about a product or service and also to invite individuals to marketing events;
- protection of our business and other clients from fraudulent or unlawful activity;
- to otherwise conduct our business and perform other management and administration tasks;
- to consider any concerns or complaints individuals may have;
- manage any legal actions involving Accord Group; and
- to help us improve the products and services offered to our clients, and to enhance our overall business.

8. How might we use and disclose personal information?

Accord Group may use and disclose personal information for the primary purposes for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose and in other circumstances authorised by the Privacy Act.

We use and disclose personal information (excluding credit information) for the purposes outlined in section 7 above. Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless the individual agrees otherwise, or where certain other limited circumstances apply (e.g. if required by law).

We engage other people to perform services for us, which may involve that person handling personal information we hold. In these situations, we prohibit that person from using personal information about the individual except for the specific purpose for which we supply it. We prohibit that person from using your information for the purposes of direct marketing their products or services.

In relation to sensitive information held by us, wherever possible, Accord Group will attempt to de-identify the information. We also undertake to take reasonable steps to delete all personal information about an individual when it is no longer needed in accordance with our record keeping obligations.

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9. To whom might we disclose personal information?

We may disclose personal information, excluding credit information, to:

- A related body corporate;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisors;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- an individual's referee(s), employer, or co-account holder;
- the recipients outlined in section 10 below; and
- anyone else to whom the individual authorises us to disclose it.

If we collect personal information from these organisations and individuals we will deal with that information in accordance with this Policy.

10. How might we use and disclose credit information?

In relation to credit information held by us, we will only use and disclose credit information for the following purposes:

- assessing an individual's credit worthiness and likelihood of approval for an application for credit;
- collecting payments that are overdue in relation to any credit that may be provided by us;
- dealing with a serious credit infringement we believe an individual has committed;
- assisting external dispute resolution scheme of which we are a member;
- if the disclosure is required or authorised by law;
- assisting the individual to avoid defaulting on his or her credit obligations; or
- the provision or management of credit to an individual.
- We will only disclose credit information to the following recipients:
 - a related body corporate;

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- a person who will be processing an individual's application for credit;
- a person who manages credit;
- a credit provider if we believe an individual has committed a serious credit infringement, or the individual has consented to the disclosure;
- to a person considering whether to act as a guarantor or offer property as security and the individual have expressly consented to the disclosure;
- a debt collector;
- a mortgage insurer;
- a CRB; and
- anyone else to whom the individual authorises us to disclose it.

11. Cloud Storage of Information

We use cloud storage and back-up services, which may involve the storage of your data on services within Australia only. Appropriate safeguards are put in place to protect this data.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act, the APPs and the Credit Reporting Privacy Code;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

12. Management of personal information

Accord Group recognises how important the security of personal information is to clients. We will at all times seek to ensure that the personal information we collect and hold is protected from misuse, loss, unauthorised access, modification or disclosure. Accord Group employees must respect the confidentiality of the personal information we collect.

Personal information is generally held in client files. Information may also be held in a computer database. All paper files are stored in secure areas. Computer-based information is protected through the use of access passwords.

In relation to our computer-based information, we apply the following guidelines:

- data ownership is clearly defined within Accord Group;
- passwords are routinely checked;
- we change employees' access capabilities when they are assigned to a new position;

- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- the system automatically limits the amount of personal information appearing on any one screen;
- all personal computers which contain personal information are secured, physically and electronically;
- data is encrypted during transmission over the network;
- print reporting of data containing personal information is limited;
- Accord Group has created procedures for the disposal of personal information; and
- personal information is overwritten to the extent possible when the information is no longer required.

If a person ceases to be a client, any personal information we hold will be maintained in a secure area or secure off-site storage facility for a period of at least 7 years in order to comply with legislative and professional requirements, following which the information will be destroyed.

13. Direct marketing

Accord Group does not use personal information for the purposes of direct marketing, unless:

- the personal information does not include sensitive or credit information;
- the individual would reasonably expect us to use or disclose the information for the purpose of direct marketing;
- we provide a simple way of opting out of direct marketing; and
- the individual has not requested to opt out of receiving direct marketing from us.

If the individual would not reasonably expect us to use or disclose the information for the purpose of direct marketing, we may only use or disclose that information for direct marketing if the individual has consented to the use or disclosure of the information for direct marketing or it is impracticable to obtain that consent.

In relation to sensitive information, Accord Group may only use or disclose sensitive information about an individual for the purpose of direct marketing if the individual has consented to the use or disclosure of the information for that purpose. We will not use or disclose credit information for the purposes of direct marketing.

Individuals have the right to request to opt out of direct marketing and we must give effect to the request within a reasonable period of time.

Individuals may also request that Accord Group provides them with the source of their information. If such a request is made, Accord Group must notify the individual of the source of the information free of charge within a reasonable period of time.

14. Identifiers

We will not use identifiers assigned by the Government, such as a tax file number, Medicare number or provider number, for our own file recording purposes. Accord Group also endeavours to avoid data-matching.

15. How do we keep personal information accurate and up-to-date?

Accord Group is committed to ensuring that the personal information, including credit information, it collects, uses and discloses is relevant, accurate, complete and up-to-date.

We encourage individuals to contact us in order to update any personal information we hold about them. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless the individual agrees otherwise. We do not charge individuals for correcting the information.

16. You have the ability to gain access to your personal information

Subject to the exceptions set out in the Privacy Act, individuals may gain access to the personal information, including credit information, which Accord Group holds about them by contacting the Accord Group Privacy Officer. We will provide access within 30 days of the individual's request. If we refuse to provide access, we will provide reasons for the refusal.

We may provide copies of the information requested, allow the individual to inspect the information at our offices, or provide an accurate summary of the information held. We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

17. Updates to this policy

This Policy will be updated from time to time to take account of new laws and technology, and changes to our operations and the business environment.

18. Responsibilities

It is the responsibility of management to inform employees and other relevant parties that the Privacy Policy is maintained and enforced. Management must ensure that they periodically advise Accord Group's employees and other relevant third parties of any changes to the Privacy Policy.

It is the responsibility of all employees and other relevant third parties to ensure that they understand and comply with this Privacy Policy. Ignorance of the Privacy Policy will not be an acceptable excuse for non-compliance.

19. Privacy training

All new employees are provided with timely and appropriate access to Accord Group's Privacy Policy and information which covers Accord Group's obligations under the Act, the APPs and the Code. Employees must ensure that they understand the privacy issues that could affect Accord Group and its clients.

20. Non-compliance and disciplinary actions

Privacy breaches must be immediately reported to management by employees and relevant Third Parties.

Employees or other relevant Third Parties that do not comply with Accord Group's Privacy Policy may be subject to disciplinary action.

21. Contractual arrangements with third parties

Accord Group must ensure that all contractual arrangements with third parties adequately address privacy issues. Accord Group will make relevant third parties aware of this Privacy Policy.

Third parties will be required to implement policies to ensure they comply with the Privacy Act, the APPs and the Code, including:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal information wherever possible;
- ensuring that personal information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal information is only disclosed to organisations which are approved by Accord Group.

22. Privacy audits

Accord Group will conduct periodic privacy audits in order to ensure that it is continuing to comply with its obligations under the APPs.

23. Inquiries and complaints handling

If you have any questions about our privacy procedures or if wish to make a complaint about how we have dealt with your personal information (including credit information) you may lodge a complaint with us in any of the following ways:

- by telephoning – 9430 5559
- by writing to – Privacy Officer, Accord Group (WA) Pty Ltd
- by emailing – accordwa@accordwa.com.au

Accord Group has an effective complaints handling process in place to manage privacy risks and issues.

Firstly, please contact your advisor at Accord Group or the Director to discuss your complaint. We strive to improve the services we offer and rely on feedback from you to help us in this regard.

Secondly, if you are not satisfied with the response you receive you should contact the Privacy Officer.

With regard to Financial Services provided by Accord Group Financial Services Pty Ltd, the following is applicable:

- Contact your Adviser and tell them about your complaint
- If your complaint is not satisfactorily resolved within 5 working days, please contact Wealthsure's compliance Manager by telephone or in writing. Wealthsure will try to resolve your complaint quickly and fairly.
- If you do not get a satisfactory outcome, you have the right to escalate your complaint to the Credit & Investment Ombudsman GPO Box 3, Melbourne Vic 3000, telephone toll free 1300 780 808. Wealthsure is a member of this service. Telephone 08 9267 3444.

24. What if I am not satisfied with the response?

If you are not satisfied with the result of your complaint to Accord Group you can also refer your complaint to the Office of the Australian Information Commissioner.

You can contact the Office of the Australian Information Commissioner:

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- by telephoning - 1300 363 992
- by writing to - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001 by emailing - enquiries@oaic.gov.au

Contact Us

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