

Privacy Policy



This Privacy Policy applies to Oakleigh Financial Services Pty Ltd and its subsidiaries and related parties, together referred to as "Oakleigh", "we", "our" or "us".

The collection and management of personal information about individuals is governed by the *Privacy Act 1988* (Cth), which includes the Australian Privacy Principles ('APP').

This policy outlines the type of personal information we collect, how that information is collected, used, stored and protected and to whom it may be disclosed.

Collection of information

Personal information is information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

We collect and hold personal information for the purposes of:

- providing financial products and services to you;
- managing and administering the products and services
- Letting you know about our other products and services.

The types of personal information we collect includes:

- Your name, date of birth, tax file number (TFN), contact details.
- Details of your dependents and family commitments.
- Your occupation, employer, employment history, employment circumstances.
- Financial details, including your assets and liabilities, income and expenses.

We only collect information that is reasonably necessary for us to perform our functions or activities.

There are specific circumstances in which we may ask for sensitive information, such as personal health information when we are advising on or dealing with risk products. We will seek your prior consent if we need to obtain sensitive information unless the APPs otherwise permit.

We are subject to legislative and regulatory requirements which require us to ask for certain information. To comply with the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* we must collect personal information and documentary evidence to verify your identity.

How we collect personal information

Generally, collection of your personal information will occur either in meetings with you, by phone, email, completion of data collection forms or by the use of our on-line facilities.

We may obtain information from your accountant, a product issuer or other third party once you have authorised us to obtain such information or authorised other parties to provide us with this information.

Cookies

We use cookies on our website. Cookies are small data files that are downloaded from our website and stored on your computer when you visit our website. Cookies are used to allow us to see which pages and what information is of most interest to visitors to our website,

When you visit our website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site. This information is used in an aggregated manner to analyse how our website to help us improve our website. Your computer's

web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time. However, please note that doing so may negatively impact your experience on our website.

Third party sites

Our website has links to other websites that are not owned or controlled by us. We are not responsible for these sites or the consequences of you going on to those sites, except as required by law. Use of links to third party websites is entirely at your own risk.

Are you obliged to provide the information to us?

You are not required to provide us with the personal information that we request, or to allow us to collect the information from third parties. However, where you choose not to provide us with the information we request or the information you give is not complete or accurate, we may not be able to provide you with services that you have requested from us.

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 practicable.

How we use your information

We use your personal information for the purposes for which the information was provided to us. This includes:

- Providing financial advice to you
- Administering your investments and accounts
- Communicating with you on an on-going basis about your investments and the market.

Personal information will also be used where you have consented to such use or as is permitted under the APPs. For example, where you would reasonably expect that usage, or in permitted health situations, or in connection with certain activities by or on behalf of an enforcement body.

How we disclose your personal information

We may disclose your personal information to persons or entities outside Oakleigh, including:

- Organisations involved in providing, managing or administering products and services that you have elected to use
- Any financial institution that holds an account for you
- Your external service providers, such as a margin lending facility provider
- Your professional advisers, including your solicitor or accountant, as authorised by you
- Your personal representative
- Businesses that have referred you to us
- Professional advisers appointed by us
- Our external service providers (e.g. IT providers, professional advisers and contractors)

Privacy Policy



Oakleigh may also disclose your personal information where it is:

- Required by law, such as to the ASIC or AUSTRAC;
- Authorised by law, regulation or by a court order.
- Required to be reported to the Office of the Information Commissioner (OAIC) under the Notifiable Data Breach (NDB) Scheme.

In certain circumstances we 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 or authorised by law or unless you have consented to disclose this information to any third party.

We use external service providers. Your information may be maintained on their servers which may be located in Australia or overseas in the course of storing that information.

The use and storage of this information is governed by our agreements with them which complies with our obligations under the Privacy Act.

Storage and protection of your personal information

We keep your personal information in your client file and on a cloud based database. 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.

Hard copy files are accessible to authorised personnel only and are appropriately secured. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off-site.

If you cease to be a client of ours, any personal information which we hold about you will be maintained for a period of 7 years in order to comply with legislative and professional requirements. After this, the information will be destroyed.

Risk of using the internet

You should be aware that the internet is not a secure environment. Whilst we take reasonable steps we cannot guarantee the security of information you provide through the internet or via our website.

Ensure your personal information is correct

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

If we disagree about the correction you have supplied, we are not required to alter the information we will provide you with the reasons why and how you may complain about our decision.

Access to your personal information

You may request access to the personal information we hold about you by contacting our Privacy Officer at compliance@oakleighfs.com. Your request should state the information you require. We will respond within a reasonable period after the request is made.

Sometimes it may not be possible for us to give you access in which case we will explain why.

Complaints

If you have a concern about the privacy of your information, you may lodge a complaint with us by writing to the Privacy Officer at compliance@oakleighfs.com.

To enable us deal with your complaint in a timely fashion you should set out a brief description of the matter the reason for your complaint and what action or remedy you are seeking from us.

Your complaint will be investigated and responded to within 14 days. If you are not satisfied with the outcome of your complaint, or require further information on privacy, you may contact the Office of the Australian Information Commissioner by:

Calling 1300 363 992

Visiting the website at www.oaic.gov.au

[Submitting an on-line form](#)

Policy updates

This policy is subject to change from time to time. The most current version of our Privacy Policy is available on our website (www.oakleighfs.com.au) or by contacting us.

Contact Details

Privacy Officer: Tim Moffatt



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