

Privacy Policy - Belfast Wealth Advice Pty Ltd

Belfast Wealth Advice Pty Ltd (Belfast Wealth Advice) is committed to ensuring the confidentiality and security of your personal information and maintains all personal information in accordance with the Australian Privacy Principles (APP) of the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

'Belfast Wealth Advice', 'we', 'us' or 'our' refers to Belfast Wealth Advice Pty Ltd and The Cutter Pty Ltd t/as Belfast Wealth Management Pty Ltd.

Belfast Wealth Advice is committed to being open with you about how we use your personal information. We need to collect personal information about you to provide you with our financial planning services. This Privacy Policy tells you how we collect your information, use the information and whom we share the information with. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

Collection of your Personal Information

Belfast Wealth Advice will only collect personal information from you where it is necessary to provide you with personal financial advice and services. We are subject to legislative and regulatory requirements which require us to obtain and hold detailed information which personally identifies you and/or expresses an opinion about some or all aspects of your financial position.

The type of personal information we may collect can include, but is not limited to:

- Full name, address, contact details, date of birth;
- Occupation and employment details;
- Details of your financial needs and objectives;
- Details of your current financial position including salary and other income, expenditure, assets and liabilities, risk insurance, superannuation, and other investments;
- Tax File Number;
- Details of your medical history and health for insurance needs; and
- Details of your estate planning requirements.

We will collect your information from you directly whenever we can by making enquiries about you. We may verify that information from sources referred to in the responses to those enquiries or in this Privacy Policy.

We do not actively seek to collect sensitive information unless it is necessary for our business purposes, such as, it may be needed for applications for personal insurance and to manage claims on those products. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

Sometimes we will collect information about you from other sources as the Privacy Act 1988 permits. We will do this only if it is reasonably necessary to do so, for example, where we:

- Collect information from third parties about your existing products to which you seek our services;
- Cannot contact you and we rely on public information to update your contact details; or
- Exchange information with your legal representative, accountants or other Representatives as permitted by you.

Belfast Wealth Advice is also required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) to verify your identity. We may do this by taking a copy of your driver's licence and/or passport or other identification documentation.

Use and Disclosure of Collected Information

The personal information we hold will be used for the provision of financial and advisory services to you. In some instances, it may be necessary for us to disclose your personal information to certain third parties. Unless you consent to this disclosure, we will not be able to provide you with financial services.

The types of organisations to whom we may disclose your personal information include, but are not limited to:

- Regulators such as the Australian Transaction Reports and Analysis Centre (AUSTRAC), the Australian Securities and Investments Commission (ASIC), the Australian Tax Office (ATO) and the Australian Prudential Regulation Authority (APRA);
- Financial institutions for the provision of financial products such as investments, superannuation, and life insurance;
- Organisations providing mailing services, maintenance of information technology services and printing standard documents and correspondence;
- Organisations providing research, technical (tax, legal, etc) and/or paraplanning services;
- Employees of your Representative or your Representative's business;
- Organisations we may contract with to provide us with a service such as outsourced compliance providers and software providers etc;
- To any party acquiring an interest in our business; and
- Where the Law requires or permits us to do so.

Further, we may use your personal contact details to send you information from time to time that we think will be of interest to you. However, you may instruct us not to send this information to you by contacting us either by phone or in writing.

Data Quality and Security

It is Belfast Wealth Advice's aim to ensure the information we hold about you is accurate, complete, and up to date. Part of our services to you may include an annual review of your circumstances. At this annual review, we will ask for your confirmation as to the accuracy of the information we hold. If you believe at any stage the information we hold is inaccurate or incomplete in any way, please contact us and provide evidence of the inaccuracy. If the information we hold is incorrect we will correct it.

The security of your personal information is important to us. Your personal information is held in a combination of secure computer based storage facilities and lockable filing cabinets or in a secure filing room. We will at all times ensure your personal information held by us is protected from misuse and loss, and from unauthorised access, modification or disclosure.

We are required by law to keep your personal information for a certain period of time. When we no longer require the information for any purpose, we will destroy it by secure means or permanently de-identify the information.

Access to Personal Information

You have the right to access any Personal Information that we hold about you. You can ask us for access to Personal Information that we hold about you at any time. To do so, please call Belfast Wealth Advice on 03 5568 2940 or email the Privacy Officer at shane@belfastwealth.com.au.

We will respond to your request within 30 days (unless unusual circumstances apply). We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. We will always check this with you first. If the information sought is extensive, we will advise you of the likely cost in advance and can help to refine your request if required.

We will provide you with access to Personal Information held about you except to the extent that we are permitted to refuse access in accordance with the Privacy Act 1988 and the Australian Privacy Principles. If we refuse to provide you with access to some information, we will provide you with our reasons in writing for doing so. If you have concerns, you may lodge a complaint.

Correction of Personal Information

We will correct any Personal Information that we hold about you if we become aware that it is inaccurate, incomplete, out of date, irrelevant or misleading.

If you believe that the Personal Information we hold about you is inaccurate, incomplete, out of date, irrelevant or misleading, you can ask us to correct it and we will take reasonable steps to do so. If there are any instances where we cannot do this, we will let you know in writing.

If we disagree that the information is inaccurate, incomplete or out of date, we will take reasonable steps to include a note on your record that you believe that such information is inaccurate, incomplete or out of date.

Government Identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will not adopt these identifiers as our own identification process.

If you have provided us with signed consent, we may hold your identifiers on file so that we can provide ongoing services to you. If you choose not to provide this consent, we will not hold this information on file.

Overseas Disclosure

Belfast Wealth Advice will not send any personal information about you overseas unless you consent or Belfast Wealth Advice reasonably believes that the other country has privacy laws substantially like our own, or Belfast Wealth Advice provides the information in other circumstances giving like protection.

Marketing

We may use personal information collected from you for the purpose of providing you with direct marketing material; however, if you do not wish to receive such information you can request not to receive it. Simply contact us by any of the methods detailed in this document and we will update our Opt Out Register accordingly. There is no cost for this request, however, please allow two weeks for your request to be actioned.

Belfast Wealth Advice adheres to the Spam Act 2003 (Cth), accordingly, we will:

- Obtain your consent before sending an electronic message to you (this can be expressed or inferred);
- Provide sender identification (so that you know who sent the message); and
- Provide you with the option to unsubscribe.

Cookies

When you visit our website, details may be recorded about your visits, such as time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that the next time you visit our website we remember your login details. A cookie is a small file that remains on your computer and contains information enabling Belfast Wealth Advice's website to recognise your browser. If you do not wish to permit the use of cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

Links to Third Party Websites

Our website may have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by our Privacy Policy and these websites are not subject to our privacy standards and procedures.

Complaints

Belfast Wealth Advice is committed to resolving your privacy complaint as quickly as possible and has a robust internal complaints procedure in place to help resolve any problems or complaints efficiently.

We recognise that even in the best run organisations things can go wrong. If you have a complaint about privacy please contact us, as we'd like the chance to fix the problem.

We aim to resolve complaints as soon as possible. We will endeavour to provide our response within a maximum of 30 days; should it take longer we will seek your agreement to extend the timeframe.

If, after having raised the issue with us, you are still dissatisfied with the outcome, you are entitled to escalate the complaint to an external dispute resolution scheme.

Belfast Wealth Advice is a member of the Australian Financial Complaints Authority (AFCA) who can be contacted by calling 1800 931 678 or by writing to GPO Box 3, Melbourne VIC 3001.

How to Contact Us

If you have any further questions or issues about privacy at Belfast Wealth Advice, please contact us by:

Phone	03 5568 2940
Email	shane@belfastwealth.com.au
In Writing	Belfast Wealth Advice Privacy Officer PO Box 47 PORT FAIRY VIC 3284

Belfast Wealth Advice reviews and updates our policies and procedures to keep up to date with changes in the law, technology, and market practice. As a result, we may change this Privacy Policy from time to time.

This Privacy Policy version 1 was amended on 21 December 2022.