



**HENDERSONS**  
private wealth

## PRIVACY POLICY

Version 1.2

Date Reviewed: October 2022

Australian Privacy Principle (APP)	Our Response
<p><i>We must tell you what kind of personal information we collect and hold, and how do we collect and use it.</i></p>	<p><i>We may provide strategic or product advice or product applications/placements on your behalf, in relation to a range of investment and insurance strategies or products. We will ask you for the information we need to provide these services. This can include information ranging from your name, address, contact details, age etc. to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing. We require this information to enable us to formulate strategy advice and select products suitable to your specific requirements.</i></p> <p><i>With your consent we may also collect personal information about you from other sources such as your accountant/tax agent, other investment managers, superannuation funds, insurers etc.</i></p> <p><i>In some cases, your personal information is only used by us to provide you with advice. In other case, your personal information is supplied to insurers for the purpose of obtaining insurance quotes, or to investment managers, for the purpose of placing investments.</i></p> <p><i>Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia. For example, if we seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, we inform you of where the insurer is located, if it is possible to do so.</i></p>

	<p><i>If you make a claim under an insurance policy, we may assist you by collecting information about your claim. Sometimes we also need to collect information about you from others. We provide this information to your insurer (or anyone your insurer has appointed to assist it to consider your claim) to enable it to consider your claim. Again this information may be passed on to reinsurers.</i></p> <p><i>From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you.</i></p>
<p><i>We must tell you how you can complain about privacy matters and how we will deal with your complaint</i></p>	<p><i>If you have concerns about whether we have complied with the Privacy Act or this privacy Policy when collecting or handling your personal information, please contact your adviser.</i></p> <p><i>Your complaint will be considered by us through our internal complaints resolution process and we will try to respond with a decision within 45 days of you making the complaint.</i></p> <p><i>If you are unhappy with the way in which we have responded to a complaint, you may raise the matter with our External Dispute Resolution Scheme. We are a member of AFCA. and you can contact them on telephone 1800 931 678, or email <a href="mailto:info@afca.org.au">info@afca.org.au</a> or post, PO Box 3 Melbourne Vic 3001.</i></p>

<p><i>APP1 – Open and transparent management of personal information</i></p> <p><i>Ensures that APP entities manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.</i></p>	<p><i>We will:</i></p> <ul style="list-style-type: none"> <li>▪ <i>take reasonable steps to implement practices, procedures and systems to ensure compliance with the APPs; and</i></li> <li>▪ <i>have a clearly expressed and up-to-date policy about the management of personal information (this document)</i></li> </ul>
<p><i>APP2 – Anonymity and pseudonymity</i></p> <p><i>Requires APP entities to give Individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply.</i></p>	<p><i>We fall under one of the exemptions and are not able by law to deal with you where you have not correctly identified yourself and we have verified your identity.</i></p>
<p><i>APP3 – Collection of solicited personal information</i></p> <p><i>Outlines when an APP entity can collect personal information that is solicited. <sup>[177]</sup> It applies higher standards to the collection of ‘sensitive’ information.</i></p>	<p><i>We will not collect personal information unless the information is reasonably necessary for, or directly related to, one or more of our functions or activities.</i></p> <p><i>We not collect sensitive information about you unless you consent to the collection and, the information is reasonably necessary for one or more of our functions or activities.</i></p>
<p><i>APP4 – Dealing with unsolicited information</i></p> <p><i>Outlines how APP entities must deal with unsolicited personal information.</i></p>	<p><i>Where we receive unsolicited personal information we must, within a reasonable period, determine whether or not we could have collected the information ourselves under APP 3. If not, and the information is not contained in a Commonwealth record, we must, as soon as practicable, but only if it is lawful and reasonable to do so, destroy the information or de-identify it.</i></p>

<p><i>APP5 – Notification of the collection of personal information.</i></p> <p><i>Outlines when and in what circumstances an APP entity that collects personal information must notify an individual of certain matters.</i></p>	<p><i>When collecting personal information either at or before the collection we must notify or make individuals from whom we are collecting information aware that we are doing so and also of a number of prescribed matters, including whether we are likely to disclose the information to an overseas recipient, and, if so, in which countries.</i></p> <p><i>If that is not practicable, it must do so as soon as practicable after the collection.</i></p>
<p><i>APP6 – Use or disclosure of personal information</i></p> <p><i>Outlines the circumstances in which an APP entity may use or disclose personal information that it holds.</i></p>	<p><i>Personal information can only be used for the primary purpose or for secondary purposes where you have provided consent and the use and disclosure is related to the primary purpose.</i></p> <p><i>Sensitive information can only be used with consent for secondary purposes that are directly related to the primary purpose.</i></p>
<p><i>APP7 – Direct Marketing</i></p> <p><i>An organisation may only use or disclose personal information for direct marketing purposes if certain conditions are met.</i></p>	<p><i>Personal information may not be used for direct marketing purposes unless you would reasonably expect your information to be used for that purpose or, if the use is not reasonably expected, with consent.</i></p> <p><i>Sensitive information may only be used for direct marketing purposes with the individual's consent.</i></p>
<p><i>APP 8 – Cross-border disclosure of personal information</i></p> <p><i>Outlines the steps an APP entity must take to protect personal information before it is disclosed overseas.</i></p>	<p><i>Before we disclose your personal information to an overseas recipient, we must take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to the information.</i></p> <p><i>There are exceptions including, ie, where the disclosure is required or</i></p>

	<i>authorised by or under an Australian law or a court/tribunal order.</i>
<p><i>APP 9 – Adoption, use or disclosure of government related identifiers</i></p> <p><i>Outlines the limited circumstances when an organisation may adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.</i></p>	<p><i>We will not adopt any of your government related identifiers (such as a tax file number) as our own identifier unless this is required or authorised by or under Australian law or a court/tribunal order, or one of the circumstances set out in APP 9.2 applies, such as where the use or disclosure of the identifier is reasonably necessary for an organisation to verify the identity of an individual for the purposes of its activities or functions.</i></p>
<p><i>APP 10 – Quality of personal information</i></p> <p><i>An APP entity must take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. An entity must also take reasonable steps to ensure the personal information it uses or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.</i></p>	<p><i>We will take reasonable steps to ensure that personal information that is collected, used or disclosed is accurate, up-to- date and complete and relevant.</i></p>
<p><i>APP 11 – Security of information</i></p> <p><i>An APP entity must take reasonable steps to protect personal information it holds from misuse, interference and loss and from unauthorised access, modification or disclosure. An entity has obligations to destroy or de-identify personal information in certain circumstances.</i></p>	<p><i>We will take reasonable steps to protect your personal information from ‘interference’ such as attacks on our computer systems, and appropriate physical security measures. This requirement applies in addition to the existing obligations to protect personal information from misuse and loss, and unauthorised access, modification and disclosure.</i></p>

<p><i>APP12 – Access to personal information</i></p> <p><i>Outlines an APP entity’s obligations when an individual requests to be given access to personal information held about them by the entity. This includes a requirement to provide access unless a specific exception applies.</i></p>	<p><i>Where you request, we will give you access to the personal information about you, that we hold.</i></p>
<p><i>APP 13 – Correction of personal information</i></p> <p><i>Outlines an APP entity’s obligations in relation to correcting the personal information it holds.</i></p>	<p><i>Where you ask us to correct your personal information, we will take reasonable steps to ensure that, it is accurate, up-to-date, complete, relevant and not misleading.</i></p>

**Director:** Dane Avery

**Signed:**

**Date:** 6 October 2022