

# PRIVACY POLICY

## OAKWOOD FINANCIAL GROUP PTY LTD

ABN 11 063 291 163 OAKWOOD FINANCIAL GROUP PTY LTDL 255231  
Head Office: Unit 2, 3A Racecourse Road, Gosford, Australia

### **1. National Privacy Principles**

Oakwood Financial Group Pty Ltd and its subsidiaries are bound by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001. This Privacy Policy sets out Oakwood Financial Group Pty Ltd commitment to those principles.

Oakwood Financial Group Pty Ltd values your privacy and so we welcome this new Commonwealth privacy legislation which came into effect on 21 December 2001. We set out in this document how we handle your personal information as required under the privacy legislation's National Privacy Principles.

Oakwood Financial Group Pty Ltd requires each of its Authorised Representatives to adopt this Privacy Policy.

### **2. Collection**

As a provider of financial planning services we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you. Our ability to provide you with comprehensive financial planning services and advice is dependent on us obtaining certain personal and sensitive information about you, which may include:

- employment details and employment history;
- details of your financial needs and objectives;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- details of your investment preferences and aversion or tolerance to risk;
- information about your employment history, employment circumstances, family commitments and social security eligibility; and
- health information (for some types of insurance)

Failure to provide the personal and sensitive information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice or financial service we give to you.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We may also receive information about you from another Licensee as a result of our provision of financial planning support services to that other Licensee, including the provision of services relating to the processing of brokerage payments and compliance support services. We will take reasonable steps to make sure that you are made aware of our collection of information about you.

### **3. Use and disclosure**

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial planning and strategy report;
- the provision of financial planning advice and services to you;

- making investment and insurance recommendations;
- implementing recommendations made to you;
- reviewing your financial strategy;
- reviewing investment and insurance recommendations;

Or to support those services offered to you by another Licensee.

We will not use or disclose Personal Information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia (FPA) to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act 2001 (Cwlth) to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission (ASIC).

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. However you may, by contacting your Authorised Representative, request not to receive such information and they will give effect to that request. Please allow 2 weeks for your request to be actioned.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, Wrap account service providers, stockbrokers and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

We may disclose your personal information to your accountant, lawyer or other financial service provider where you have authorised such disclosure.

In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our authorised representatives who will be your primary point of contact within our organisation.

In the event that Oakwood Financial Group Pty Ltd may be approached by a potential new shareholder, we may disclose part of your personal information to that potential investor for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that an investment in the business is effected, it may necessitate a transfer your personal information to that new investor.

#### **4. Document security and storage**

Your personal information is maintained securely and is generally held in your client file. Information may also be held in our computer databases. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

In the event you cease to be a client of this organisation, 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, following which time the information will be destroyed.

#### **5. Access and correction**

You may request access to your personal information by contacting our Authorised Representative or Privacy Officer. We will (subject to the following exceptions) provide you with access to that information

either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information we hold about you is inaccurate, incomplete or outdated, you may contact our Authorised Representative, or Privacy Officer, and provide us evidence of the inaccuracy or incompleteness. We will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

## **6. Our Web site**

The Oakwood Financial Group Pty Ltd Web site may contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.

The Web site uses cookies which allows us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

**7. Privacy Complaints**

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, your complaint should be directed to our Privacy Officer, as detailed below. We will endeavour to resolve any complaint to your satisfaction. However, if we are unable to satisfactorily resolve your concerns you can contact the Office of the Privacy Commissioner who may investigate your complaint further.

**Contact Details**

Privacy Officer: *Mrs Sarah Cavanagh, Director*  
Address: *c/o Oakwood Financial Group Pty Ltd*  
*Unit 2, 3A Racecourse Road, Gosford NSW 2250*  
Telephone: *02 43249177*  
Facsimile: *02 43249055*

**8. Changes to this Privacy Policy**

We reserve the right to review and amend this Privacy Policy from time to time.

**9. Additional Privacy Information**

Further information on privacy in Australia may be obtained by visiting the Web site of the Office of the Federal Privacy Commissioner at <http://www.privacy.com.au>