



PRIVACY POLICY

FINANCIAL PLANNING SERVICES TO HELP BUILD,
MANAGE AND PROTECT YOUR WEALTH.

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Privacy Policy

We understand how important it is to protect the privacy of your personal information. Accordingly, this document sets out our privacy policy commitment in respect of personal information that you may provide to us.

Our privacy policy outlines how we manage your personal information, including how and what information we collect from you, how we hold your personal information, how we use and disclose personal information and how you can access and/or update your personal information.

Summerhill Financial Services abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001.

1) Your personal information

Your personal information will be collected and held by Summerhill Financial Services, as a holder of an Australian Financial Services Licence, in order to provide you with advisory services that you have requested and to manage our relationship with you.

To enable us to provide you with financial advice that you have requested and that is suitable for your investment objectives, financial situation and particular needs, we need to obtain and hold certain personal information about you. Our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- your name, address and date of birth
- details of your financial needs and objectives
- details of your investment preferences and aversion or tolerance to risk
- any other information we consider necessary.

2) Consequences of not providing the requested personal information

Failure to provide the personal 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 we give to you.

As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we may elect to terminate our relationship with you if we believe we are unable to provide you with a complete service, based on the advice requested.

3) How we collect your personal information

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 your personal information will be collected from you in meetings with your adviser, over the telephone, via facsimile or e-mail or any other written material that you provide.

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 plan
- the provision of financial planning advice to you
- making securities and investment recommendations
- reviewing your financial plan
- reviewing securities and investment recommendations.

4) The use and disclosure of your personal information

Your personal information may be disclosed for purposes related to the provision to you of the financial advice that you have requested. The types of service providers that may be provided with your personal information include:

- your advisers/service providers such as your lawyer, accountant, stockbroker, bank or tax agent, on your written authorisation
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services
- government authorities and other organisations when required by law
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested, and
- organisations that you have consented to your personal information being disclosed to.

If we disclose your personal information to any third party service provider, we will do so on a confidential basis, including by seeking to ensure that the personal information is held, used or disclosed consistently with the National Privacy Principles.

Your personal information may be used to:

- enable Summerhill to provide advice, products or services that you have requested
- conduct identity verification and customer due diligence
- comply with the anti-money laundering and terrorist financing obligations, and
- comply with the law.

We also collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

5) Safety and Security of your personal information

We will take reasonable steps to protect your personal information. All personal information collected by us will be stored in a secure environment to protect against unauthorised access, misuse, loss, modification or unauthorised disclosure.

6) Accessing your personal information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies
- providing you with the opportunity for inspection, or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

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 relates 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.

7) Updating your personal information

Summerhill Financial Services takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible
- update us with any changes to your personal information as soon as possible

8) Spam Act

- a. Spam is a generic term used to describe electronic 'junk mail' – unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'. 'Electronic messages' covers e-mails, instant messaging, SMS and other mobile phone messaging, but does not cover normal voice-to-voice communication by telephone.
- b. Summerhill Financial Services complies with the provision of the Spam Act when sending commercial electronic messages.
- c. Equally importantly, we make sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients' contact details.

9) Internal procedure for dealing with complaints

The three steps Summerhill Financial Services follows:

Consent: only commercial electronic messages are sent with the addressee's consent, either express or inferred consent

Identify: electronic messages will include clear and accurate information about the person and that Summerhill Financial Services is responsible for sending the commercial electronic message

Unsubscribe: we ensure that you can unsubscribe from any emails sent to you.

10) Consent to communications

- a. Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is acceptable to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

Contact Details

Privacy Officer: **Caroline Bell**

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