

PRIVACY POLICY

Smarter Cashflow Solutions Pty Ltd (“SmarterCFS”) regards Privacy as a pertinent issue and understands that it is important for you to know how we handle your personal information.

Privacy Laws apply to how we collect, hold, use and disclose your personal information. Smarter complies with its obligations under the Privacy Act 1988 and the associated Australian Privacy Principles (“APPs”) and is committed to protecting the privacy of your personal information.

You can obtain further details of our obligations as an organisation under Australia’s privacy laws from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner’s associated guidelines at www.oaic.gov.au.

The following Privacy Policy has been published to provide you with an outline of the following:

- The types of personal information that we collect and keep on record.
- Why we collect, hold, use and disclose your personal information.
- How we collect your personal information.
- How you may access your personal information and correct it if necessary.
- How to raise your concerns to us in relation to our handling of your personal information; and
- If we are likely to disclose your personal information to overseas recipients.

Types of personal information that we collect, use and hold

There are two types of personal information that SmarterCFS may collect, use and hold:

Personal information – this is any information or opinion about you, whether the information or opinion is true or otherwise, and whether the information or opinion is recorded in a material form or otherwise. Usually, this is the information that identifies you, such as your name, address, contact details, gender information, occupation details and any other information that can identify you.

Sensitive information – this is usually information about an individual’s racial or ethnic origin, political opinions or membership, religious or philosophical beliefs, criminal record, health or genetic information.

Why we collect your personal information

SmarterCFS collects and holds personal and sensitive information for the purposes of establishing and building a financial services relationship with you. For example:

In relation to financial services, Smarter will require your personal information to provide suitable financial advice. In some cases, we provide personal information to our contractors, who provide us with services to assist us with conducting our business.

You do not have to provide to SmarterCFS any of your personal information; however, if you choose not to provide the information or if you provide incomplete or inaccurate information, we may not be able to provide the services you are seeking.

How we collect your personal information

Personal information about you is generally collected directly from you, unless you have consented to us obtaining information from a third party, such as your accountant, spouse, or superannuation fund.

However, there may be circumstances where it is not practical or reasonable for us to obtain your consent before collecting your personal information from a third party. For example, if you are nominated as a beneficiary of a life or superannuation policy or your information is obtained through publicly available information services, such as social media or telephone directory, SmarterCFS will not obtain consent from you prior to collecting your information.

When you visit SmarterCFS’s or any of our representatives’ web site we may collect information of a statistical nature such as the pages you viewed or the time online. This information is collected using cookies. Cookies do not identify individual users although they do identify a user’s browser type and Internet Service Provider. You can configure your browser to accept all cookies, reject or notify when a cookie is sent.

Please refer to your browser instructions for more details.

Where we collect information from you about another individual, such as your nominated beneficiary, it is important that you advise them of the disclosure and their Privacy rights.

Disclosure of your personal information

Generally, your consent is obtained before we disclose your personal information to a third party. Your consent can be in writing, by telephone, or implied by your conduct.

Depending on the type of service or product provided to you we may need to disclose your personal information to:

Investment Managers, Insurance Companies or Financial Institutions;

A third party acting on your behalf e.g. your nominated financial adviser, accountant;

External service providers that provide services to us or our representatives e.g. mailing houses, software suppliers and stationers.

In some instances, we may be required to disclose your personal information to external services providers who are located overseas, including United States of America, Singapore, Malaysia and Vietnam. In some circumstances however we may be required by Law to disclose your personal information.

It may also be necessary to disclose your personal information to a party acquiring an interest or shareholding in SmarterCFS’s or any of our representatives’ business.

Access to personal information

You can request us at any time to provide you with access to the personal information we hold about you. Under some circumstances we may not be required to provide access to you and in such cases a written explanation will be given to you.

Access to your information will be provided on receipt of a written request and will generally be processed within 21 days. More time may be required for more complex requests. Your written request should be forwarded to our Privacy Officer at the address provided on this document.

There is no fee for requesting access to your information; however, we may charge you the reasonable costs of processing your request.

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Personal information quality

We try to ensure that your personal information is accurate, complete and up-to-date. To assist us with this please keep us advised of any of your personal details which may have altered.

Further, if you believe that the information we have about you is not accurate, complete or up-to-date, please contact us and we will use all reasonable efforts to correct the information. If we disagree as to the accuracy of the requested correction, we will make an appropriate notation in your records that you claim the information we hold is not accurate, complete or up-to-date.

Personal information security

We take all reasonable administrative, technical, and physical safeguards to protect your personal information from misuse, loss, unauthorised access, alteration or disclosure.

Your personal information may be stored on business servers or Cloud Storage, which can be located overseas.

Secure methods are used to destroy or de-identify any personal information, provided the information is no longer needed for any purpose and it is permissible by the law to do so.

Marketing and promotional material

We acknowledge and respect your right to choose to opt-out of receiving information about products and services supplied by us, or by others, which we think may be of interest to you.

Should you decide not to receive marketing or promotional material from us you can opt-out at any time by advising us in writing or contacting us by telephone.

Privacy policies of other parties

Many of the product and service providers you may deal with through your relationship with SmarterCFS will also have Privacy Policies concerning the manner in which they collect, hold, use or disclose personal information. These Policies can generally be accessed via the provider's web site or will be made available to you upon request to them.

Changes to this statement

SmarterCFS may make changes to our Privacy Policy from time to time. We will publish those changes on our web site www.Smartergroup.com.au.

Contacting us about privacy

If you would like further information regarding our Privacy Policy, or if you think we have breached any aspect of this Privacy Statement, please contact our Privacy Officer, by:

Telephone: 0418 332 225 between 9.00am and 5.00pm (Vic time) Monday to Friday

Email: info@smartercfs.com.au

Post: PO Box 10, Sandringham Vic 3191

Issued by

Smarter Cashflow Solutions Pty Ltd, ABN 78 137 173 605
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www.smartercfs.com.au