

Privacy Policy

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This Privacy Policy applies to personal information collected by Affinia Financial Advisers Limited (Affinia). It is intended to provide you with a detailed description of how we collect and handle your personal information.

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About this document

At Affinia we understand that the privacy of your information is important to you and we respect the confidentiality of the information that you provide to us.

This Privacy Policy provides information about how we manage the personal information that we collect and hold about individuals. This document is technology neutral, that is, it applies to all forms of documentation and communications, and is based on transparency and openness, in accordance with the relevant privacy laws.

Affinia is obligated to act in accordance with all relevant privacy legislation. As at the date of this document current privacy laws comprise of the Privacy Act 1988 (Cth) and subsequent amendments, which includes the thirteen Australian Privacy Principles (APPs) and any Registered APP Code.

When Affinia holds, uses or discloses personal information collected from a related body corporate, it must comply with the relevant privacy law obligations, APPs and any binding registered APP Code.

Note that Affinia has a number of business partners and affiliates that have their own privacy policies.

The APPs set out how organisations must handle information during the entire life cycle of collection, use and disclosure of personal information. They are set out below:

1. Open and transparent management of personal information
2. Anonymity and pseudonymity
3. Collection of solicited personal information
4. Dealing with unsolicited personal information
5. Notification of the collection of personal information
6. Use or disclosure of personal information
7. Direct marketing
8. Cross-border disclosure of personal information
9. Adoption, use or disclosure of government related identifiers
10. Quality of personal information
11. Security of personal information
12. Access to personal information
13. Correction of personal information

How and why does Affinia collect and use personal information?

It is important that you understand why Affinia collects, uses and/or discloses your personal information. We only collect personal information that is reasonably necessary for our functions or activities. The reasons include:

- to provide you with information about financial services we provide, including but not limited to, advice on life insurance products, superannuation and retirement income products, investment products and financial planning advice
- to provide you with the product or service that you have requested from us
- to communicate with you about the products or services that we have provided advice to you on or are providing advice to you on. This includes, but is not limited to, life insurance products, superannuation and retirement income products, investment products and financial planning
- to comply with our legal obligations
- to establish and administer our customer relationships
- to monitor and evaluate products and services
- to provide information on services offered by Affinia and affiliated product and service providers with whom we have a business arrangement. If you have provided us with your email or mobile phone details, we or the provider may provide information to you electronically with respect to those products and services (unless you tell us otherwise), and
- to gather and aggregate information for statistical, prudential, actuarial and research purposes, and to take measures to detect and prevent fraud.

In most instances, we collect your personal information from you when you fill out a data collection form, a fact find, an application form or a personal statement, but we may also collect information from you which you provide to us over the telephone, via fax, email, post or the internet, or by using other electronic devices.

We collect your personal information and use it to provide you with advice on the types of products that are appropriate for your circumstances. For example, your health information is used to assess the ability for you to get insurance cover and the pricing of that product. Your financial information is used to determine the level of insurance cover appropriate to you and your circumstances. If it is not required, we will not collect sensitive information.

We are also bound by other legal obligations to collect information about our customers, including but not limited to, those relating to the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and the U.S. Foreign Account Tax Compliance Act.

For example, we may need to obtain a copy of a driver's licence or passport when transacting with you and may need to ask if you are a U.S. resident for tax purposes.

Personal information

What personal information do we collect?

Personal information collected by Affinia generally includes:

- name
- address
- date of birth
- gender
- marital status
- occupation
- contact details (including telephone, fax and email) and
- financial information.

In some instances we collect personal details unlikely to be known to other people to help us identify you over the telephone. This assists us in providing greater security over the personal information collected and held by Affinia. We may also monitor and record telephone calls for training and security purposes. Depending on the service offered by Affinia, we may collect:

- the number and ages of your dependents
- the length of time at your current address
- your employer's name and contact details
- the length of your employment
- proof of earnings, and/or
- details of your previous employment.

Sensitive information

Sensitive information includes:

- information or opinion about an individual's racial origin, professional memberships, sexual preference or criminal records
- health information e.g. blood tests or medical reports, and
- other genetic information.

To provide you with some of our services sensitive information may be required.

The collection of sensitive information is generally subject to greater restrictions. We will not collect sensitive information about you without your consent, subject to some exceptions including:

- the collection is required or authorised by an Australian law or a court order, or
- where a permitted general situation applies, such as serious threats to life.

All references in this document to personal information should also be read to be a reference to both personal and sensitive information.

Withdrawing consent

Having provided consent for the collection, use and disclosure of your personal information, you are able to withdraw this consent at any time by contacting us using the contact details in this document. Please note that withdrawing your consent for Affinia to collect, use and/or disclose your personal information may lead to us no longer being able to provide you with our services.

Collection of personal information

Affinia collects personal information that is reasonably necessary for one or more of our functions or activities, including the provision of advice. We generally obtain the consent of the individual involved before we collect their personal information, unless otherwise permitted by law.

Affinia collects personal information only by lawful and fair means. Generally we collect personal information about an individual only from that particular individual unless it is required by law or it is unreasonable or impracticable to do so.

When we collect information about individuals we take reasonable steps to provide them with access to this document so that they know how we collect, use and disclose information.

Collection from a third party

We sometimes collect personal information from a third party or from a publicly available source, but only if:

- the individual has consented to such collection or would reasonably expect us to collect their personal information in this way, or
- it is necessary for a specific purpose that is authorised under law.

These third parties or publicly available sources may include:

- product providers such as insurers and superannuation providers
- referral partners
- another financial planner or adviser
- an employer or employer's adviser for corporate members
- a doctor, health professional
- an accountant
- trustees
- partners
- company directors and officers
- customer's agents, or
- officers of cooperatives and associations.

Collection from young people

Requests from minors (those under 18 years of age) to acquire products or services from Affinia in their own name are considered on their merits. Information may need to be collected from the minor's guardian.

Notification

We take reasonable steps to inform you that we have collected your personal information, unless it is not reasonable to do so or it is apparent from the circumstances that you are aware of this matter or would expect us to have the information. At the time, or as soon as practicable after, we collect your personal information, we take reasonable steps to inform you of:

- our identity and contact details
- the purpose for which we collect the personal information
- the main consequence if the personal information is not collected
- the type of other entities to which we usually disclose personal information to, and
- whether we are likely to disclose your personal information to overseas recipients.

Disclosure of personal information

Depending on the advice that we have provided, Affinia may also disclose your personal information to other persons or entities, such as:

- any person acting on your behalf, including your solicitor, accountant, executor, administrator, trustee, guardian or attorney
- affiliated product and service providers
- auditors we appoint to ensure the integrity of our operations
- for members of superannuation funds, to the trustee or administrator of the superannuation fund
- if required or authorised to do so, regulatory bodies and government agencies
- insurers, including proposed insurers, claims assessors and/or investigators (so that your claim can be assessed and managed), medical practitioners (to verify or clarify, if necessary, any health information you may provide)
- other organisations which in conjunction with us provide products and services (so that they may provide their products and services to you), and
- our solicitors, valuers and insurers.

We may also disclose your information to organisations which:

- are undertaking reviews of our systems and operations
- are a third party we have an arrangement with to provide us with a product or service

- are involved in providing, managing or administering your product or service such as third party suppliers, other Affinia organisations, loyalty and affinity program partners, printers, posting services, call centres, lenders, mortgage insurers, information technology support, and our advisers
- are organisations who wish to tell you about their products or services that might better serve your financial, e-commerce and lifestyle needs or promotions or other opportunities, and their related service providers, except where you tell us not to
- are involved in maintaining, reviewing and developing our business systems, procedures and infrastructure including testing or upgrading our computer systems
- are involved in a corporate re-organisation or are involved in a transfer of all or part of the assets or business of Affinia, or
- are involved in the payments system including financial institutions, merchants and payment organisations.

We may also disclose personal information when we outsource certain functions including bulk mailing, direct marketing, debt recovery and information technology support. In all circumstances where personal information may be disclosed or become known to our contractors, agents and outsourced service providers, there are strict confidentiality arrangements in place. Contractors, agents and outsourced service providers are not permitted to use or disclose personal information for any unauthorised purposes.

We may also disclose your information to a third party where you have given your consent. We may also disclose your information where you would reasonably expect us to disclose your information to that third party.

There are circumstances where Affinia may also disclose your personal information where it is:

- required or authorised by an Australian law or a court order (such as to the Australian Taxation Office), or
- where a permitted general situation applies, such as serious threats to life.

We also use the information we collect and hold to help detect and prevent illegal activity. We co-operate with police and other enforcement bodies and agencies as required or authorised by law.

Where we hold your personal information in conjunction with that of another individual/s (e.g. joint policy owners), we allow each individual access to their own personal information and to common information (e.g. premium payments and status of policy), but not to the personal information of the other individual/s.

Security of personal information

We strive to keep the personal information that you provide to us safe and secure. We take all reasonable precautions to protect the personal information we hold about you from misuse, interference and loss; and from unauthorised access, modification or disclosure. We have a range of practices and policies in place to provide a robust security environment. We ensure the ongoing adequacy of these measures by regularly reviewing them. Our security measures include, but are not limited to:

- educating our staff and authorised representatives as to their obligations with regard to your personal information
- requiring our staff and authorised representatives to use passwords when accessing our systems
- encrypting data sent from your computer to our systems during internet transactions and customer access codes transmitted across networks
- employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing
- providing secure storage for physical records
- employing physical and electronic means, including access controls (as required) to protect against unauthorised access to buildings, and
- securing paper files in locked cabinets, and physical access restrictions.

Accuracy and correction of personal information

We take steps to ensure that the personal information we collect is accurate, up to date and complete. These steps include maintaining and updating personal information when we are advised by individuals that their personal information has changed, and at other times as necessary.

You should contact us if any of the details you have provided change or if you believe that the information we have about you is not accurate, complete or up-to-date.

You may request access to the personal information we hold about you or request that we correct that personal information. Generally, we will allow access or correct the information unless we consider there is a sound reason under the Privacy Act 1988 or other relevant law to refuse access or not correct the information.

If we do not agree to provide access to personal information or to correct the information we hold about you, where reasonable to do so, we will provide you with a written notice setting out the reasons for the refusal. The written notice will also set out the mechanism available to you to complain about the refusal.

If we do not agree to correct the personal information, you may request a statement associated with the information that the personal information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take such steps as are reasonable to associate such a statement with the personal information.

Individuals can obtain further information about how to request access or changes to the information we hold about them by contacting us.

Your rights to access information that we hold

Under current privacy legislation, you are generally entitled to access the personal information we hold about you. If you wish to access your personal information, we ask that you put this request in writing using the contact details in this document. This process will assist us in identifying you and will also assist us by identifying your policy number/s and the type of information to which you are requesting access.

We will deal with your request as soon as possible and aim to respond to your request within 28 days. The time we require to process your request will depend upon the type of information you have requested. An access charge may apply, but not for processing the request itself.

Your access to your personal information is subject to some exceptions allowed by law. In certain circumstances, you may not be entitled to access the personal information we hold about you. These circumstances include:

- we reasonably believe that providing access would pose a serious threat to the life, health or safety of an individual
- access would have an unreasonable impact on the privacy of others
- the information relates to existing or anticipated legal proceedings
- access would be unlawful
- denying access would be required or authorised by law
- access would jeopardise an enforcement related activity, or
- the request is frivolous or vexatious.

If we do not agree to provide access to your personal information, where reasonable to do so, we will provide you with a written notice setting out the reasons for the refusal. The written notice will also set out the mechanism available to you to complain about the refusal.

Identification and verification

We are required by law to identify you in some circumstances, such as prior to giving advice to you. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) in order to meet the standards set under those laws.

We may take steps to verify the information we collect, for example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in a claim for income protection is accurate.

Direct marketing and opting out

Personal information is shared between Affinia and other companies with which it has a business relationship. They may provide you with information on their products and services which we consider may be of interest to you. Affinia discloses your personal information to a number of its related bodies corporate which assist us in providing you with products or services. Affinia may disclose your personal information to external organisations that assist us in administering the provision of products or services to you. Please contact us using the details provided in this document if you do not want your personal information to be used in this way.

We may disclose your personal information for the purposes of direct marketing if we collected the information or you would reasonably expect that we would disclose your information for that purpose. We may also disclose your personal information for direct marketing purposes if we did not collect that information from you, but you gave your consent, or it is impractical to obtain that consent. We provide a simple means by which you can request to not receive direct marketing communications from us.

We may also use personal information held about you to keep you informed of new products or special arrangements offered or distributed by us, or other organisations with which we have a business relationship, or to conduct marketing activities and may disclose information about you to our service providers for this purpose.

Please contact us using the details provided in this document if you do not want your personal information to be used in this way or to opt out of receiving marketing information altogether. If you opt out of direct marketing communications, we will no longer be able to share your personal information for that purpose.

How to contact Affinia

Affinia may be contacted by post, phone, or email.

Affinia Financial Advisers Limited
GPO Box 5380
Sydney NSW 2001
1300 AFFINIA (1300 233 4642)
hello@affinia.com.au
www.affinia.com.au

If you have any privacy related questions or would like further information on our privacy and information handling practices, please contact our Privacy Officer at:

Affinia Financial Advisers Limited
Attention: Privacy Officer
GPO Box 5380
Sydney NSW 2001

If you have a privacy related complaint, please contact our Complaints Resolution Officer at:

Affinia Financial Advisers Limited
Attention: Complaints Resolution Officer
GPO Box 5380
Sydney NSW 2001

How we handle privacy related complaints

Affinia has a centralised internal complaints process. Complaints handling is a key component of Affinia's compliance management framework, as our regulatory obligations include having a strong internal complaints process as well as being a member of appropriate external complaints schemes. We aim to deal with all complaints within a reasonable timeframe and in a fair and efficient manner.

To lodge a complaint you can write to us using the contact details in this document. If we cannot deal with your issue straight away, we will acknowledge your correspondence normally within a few days.

If your complaint requires further investigation, we will aim to resolve it within 45 days. If we cannot resolve it within that timeframe, we will contact you and let you know the reasons for the delay and what extra time we may need.

In any event, throughout the investigation of your complaint we will provide you with updates of our progress so that you are aware of what is happening at all times.

Your complaint will be handled by a complaints manager who will deal with you personally to discuss your complaint, including any proposed resolution.

In the event that Affinia is unable to resolve your complaint to your satisfaction, we will inform you as to how you can escalate the complaint to the appropriate external dispute resolution body. In cases of privacy related complaints, this is generally the Office of the Australian Information Commissioner.

Cross border disclosure to overseas countries

Generally when carrying out our core business activities in providing our products and services, we do not disclose customer information to overseas countries and if we did so, we would take reasonable steps to ensure that the overseas entity protects that information against unauthorised access or loss, such as entering into a contract with the organisation providing that service. Currently, Affinia is unlikely to disclose customer information overseas, but if this situation changes, the Affinia website will be updated with a list of countries to which Affinia is likely to send customer information.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so.

If you wish to obtain an indicative quote as a potential customer, we are happy to provide the same on an anonymous basis. However, as a financial services provider we need your full and correct details before we can provide you with any of our products and services.

Government related identifiers

We do not use Tax File Numbers, Medicare numbers or any other government identifier for the purpose of identifying you with our products or services.

The only circumstances in which we would collect, use or disclose these details is where we are required or authorised by law to do so. For example we may be required to disclose your TFN to the Australian Taxation Office.

As a recipient of TFNs, Affinia must ensure that TFN information is protected by such security safeguards as is reasonable in the circumstances to take, to prevent loss, unauthorised access, use, modification or disclosure and other misuse. The purpose of this document is to minimise the risk of security safeguard breaches.

The overriding principles are:

- limiting the need to obtain TFNs only to instances where they are required by law
- restricting access of TFNs to authorised operations staff
- restricting when and how TFNs can be used, i.e. using them for the purpose they are provided
- ensuring security safeguards are implemented and maintained
- minimising the risk of loss, unauthorised access, use, modification or disclosure
- TFNs can only be collected, recorded, used and disclosed for tax purposes, and
- TFNs cannot be used as an identifier.

Additional information and links to useful websites

The Office of the Australian Information Commissioner (OAIC) promotes and protects privacy in Australia. It is an independent office that has various responsibilities under the privacy legislation including:

- providing general guidance and information about privacy legislation and privacy issues
- investigating complaints from individuals and investigating possible breaches of the legislation, and
- promoting awareness of privacy rights and responsibilities.

Under current privacy laws the Privacy Commissioner can:

- investigate organisations of actual or perceived privacy breaches
- seek civil penalties in the case of serious or repeated breaches of privacy, and
- conduct assessments of privacy performance for Australian businesses.

People who are dissatisfied with the way an organisation has dealt with their personal information can complain to the OAIC and the issue will be investigated. Generally, a person would need to have taken that complaint through the internal complaints resolutions process with the organisation before the OAIC will conduct an investigation. Useful information about the privacy rights of individuals and privacy obligations imposed on organisations can be found on the website for the OAIC at www.oaic.gov.au.

Note that this website is not owned or controlled by Affinia. Whilst this link is provided for your convenience, you should be aware that the information handling practices of the linked website might not be the same as ours.

Cookies and website analytics

Cookies

A 'cookie' is a packet of information that allows the server (the computer that houses the website) to identify and interact more effectively with your computer. When you use one of our websites, we send you a cookie that gives you a unique identification number. A different identification number is sent each time you use one of our websites. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider (ISP). You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our websites. To evaluate the effectiveness of our website advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions.

Most of our online platforms use sessions and cookies. The core functionality on these platforms will be largely unaffected if you disable cookies in your browser, but you may be unable to access some advanced functions.

We do not give personal information collected online to other organisations or anyone else without consent unless the individual would reasonably expect, or has been told, that information of that kind is usually passed to those agencies, organisations or individuals, or the disclosure is otherwise required or authorised by law.

If you are on one of our automated email lists, you may opt out of further contact from us by clicking the 'unsubscribe' link at the bottom of the email.

There are inherent risks in transmitting information across the internet and we do not have the ability to control the security of information collected and stored on third party platforms. In relation to our own servers, we take all reasonable steps to manage data stored on our servers to ensure data security.

Website analytics

At Affinia we use website analytics measurement software to help us track traffic and usage of the Affinia website. This allows us to obtain an anonymous overview of the users of the site. The system collects information such as the number of individual users, how long users spend on the site, and how users enter and exit the site.

This information is of a non-personal nature, and is collected and collated by a third party. This information helps us analyse the use of our website. As no personal information is collected, you cannot be identified personally from this information. No personal information is stored in relation to website analytic data.

Changes to this Privacy Policy

We reserve the right to review and amend this document from time to time, particularly to take into account any changes to legislative or regulatory requirements. Updated versions will be made available on our website and are available free of charge on request.

Affinia will review this Privacy Policy from time to time, in order to consider new laws and technology, changes to our operations and practices and to make sure our Privacy Policy remains appropriate.



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