



PRIVACY POLICY

The privacy of your personal information has always been important to us at Hartmann Planning. In addition to complying with existing laws that govern confidential information that you provide us, we are also required to comply with the National Privacy Principles. We will always seek to comply with the National Privacy Principles as well as other applicable laws affecting your personal information.

This privacy policy outlines our policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

Collecting Your Personal Information

Your personal information will be collected and held by Tim Hartmann, Garth Bailo or Toby Stewart, who are authorised representatives of Hartmann Planning Pty Ltd. (ABN 19 133 143 147)

- Providing you with the advisory services that you have requested;
- Managing our relationship with you; or
- Contacting you about products and services in which you may be interested.

To enable your financial adviser to provide you with financial advice you request, that is suitable for your investment objectives, financial situation and particular needs, we need to obtain and hold personal information about you. This includes:

- Your name, contact details, tax file number (TFN) and date of birth;
- Employment details and history;
- Financial details including information about your financial needs and objectives, your current financial circumstances, including your assets and liabilities, income, expenditure, insurance cover, and superannuation;
- Details of your investment preferences and risk tolerance;
- Bank account details
- Family circumstances and social security eligibility; and
- Any other information we consider necessary.

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the phone or with written material. We may need to collect personal information from third parties such as your accountant.



How Your Personal Information is Held

Your personal information is generally held in an ASIC approved online computer file/database. This online file/database system is secure and cannot be accessed without a log in ID and password. These details are not disclosed to any party other than employees of Hartmann Planning. We will seek to ensure that we take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss, and from unauthorised access, modification and disclosure.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the National Privacy Principles.

Using and Disclosing Your Personal Information

We use your personal information for the purposes for which it has been obtained. We collect your personal information so that we are able to act on your request, such as:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits
- report the investment performance of your account
- Keep you up to date on other products and services offered by us.

Personal information will also be used where you have consented to such disclosure or where it is required or authorised under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

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

- Fund managers / organisations in connection with the provision to you of the financial advice you have requested;
- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- Organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business service.
- Your representatives or service providers such as your accountant, solicitor, tax agent, stock broker or bank'
- Organisations involved in a business restructure or transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer'
- Government authorities and other organisations when required by law; and
- Organisations that you have consented to your personal information to be disclosed to.



Your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any other purpose other than:

- The primary purpose for which it was collected or a purpose that is related to the primary purpose for which it was collected or related secondary purpose;
- Where you have consented to the use or disclosure; or
- In other circumstances where the National Privacy Principles authorise the use or disclosure, such as when it is required by or authorised by law.

We may disclose your personal information to third parties who provide a service to us, in which case, we will seek to ensure that the personal information is held, used, or disclosed consistently with the National Privacy Principles.

We will not collect any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. There are also specific circumstances in which we will ask for your sensitive information such as:

- personal health information from you when applying for insurance
- personal health information from medical practitioners when you are making a claim
- income information from employers in instances where you are applying for additional insurance protection or salary continuance insurance
- Details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993*, for the purposes of paying benefits in the event of your death.

We will always seek your consent before collecting this kind of sensitive information.

Accessing Your Personal Information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access, please contact us.

Correcting Your Personal Information

We endeavour to take reasonable steps to ensure that the personal information that we collect, use, or disclose is accurate, complete and up to date. If you believe that any of the personal information that we hold is not accurate, complete or up to date, please contact us and provide us with evidence that this is not accurate, complete and up to date.

If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information, we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information, a statement claiming the information is not accurate, complete and up to date we will take reasonable steps to comply with this request.



Complaints

If you believe that we have mishandled your personal information, in turn, breaching the APPs, you may lodge a complaint with us. The complaint, addressed to the Privacy Officer, must be in writing in accordance with the Privacy Act 1988. Refer to section 9 for contact details for our Privacy Officer.

From receipt of your written complaint, the Privacy Officer has 30 days to respond.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner. You can lodge a written complaint with the Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: www.oaic.gov.au
- Submitting a hard copy form which can be obtained at http://www.oaic.gov.au/images/documents/privacy/privacy-complaints/making-a-privacy-complaint/Privacy_Complaint_Form.docx
- fax to 02 9284 9666
- email at enquiries@oaic.gov.au