



Essential Wealth Privacy Policy

Essential Wealth respects the privacy of the people we deal with and we uphold high standards of privacy practice and security. This policy explains how we handle personal information and how we interact with you online.

Whenever we handle personal information, we take steps to ensure that appropriate standards of privacy practice and security are applied.

Essential Wealth Privacy Policy sets out why we need to collect personal information, how we collect it, what we do with it, how it's stored and who we might share it with. The Policy also describes how you can access or correct information we hold about you, how you can ask further questions or make a complaint, and information about our websites and online activities.

The information we collect

For most products and services it is necessary for us to collect 'personal information' such as your name, identity details, photos, contact details and transaction information. We may also need to collect other personal details (such as gender, marital status and financial information) and other information from which you can be identified.

Employment Applications

We collect personal information from you if you apply for a job with Essential Wealth.

Health Information

We collect your health information where we offer you products with an insurance component or in assessing certain claims, including hardship. We do not use or share that information for any purpose other than the underwriting or administration of your policy, claim or account, or as otherwise notified to you at the time we collect your information.

Sensitive Information

Generally, we do not collect sensitive information about you unless required by law or where you consent for us to do so (and in any event only where it is relevant to your product). We will not collect sensitive information about you where this is expressly prohibited by local law.

Sensitive information includes information relating to:

- race
- political or religious beliefs
- sexual orientation and sexual life
- criminal convictions
- membership of professional or trade associations or unions
- biometric and health information
- information about your affiliation with certain organisations, such as professional associations.

Why we collect personal information

We collect personal information about you which is reasonably necessary to:

- provide you with quality products or services.
- consider applications and approaches you make to us
- conduct marketing and social functions
- maintain your contact details
- fulfil our legal obligations, such as those relating to taxation and anti-money laundering and counter-terrorism financing or as otherwise authorised by you

Without such information, we may not be able to process your application or provide you with an appropriate level of service. In such circumstances, we will process your application and provide you with the most appropriate level of service that we can.

How we collect your information

We collect personal information about you directly from you this can be in person, in documents you give us, from telephone calls, emails, competitions you enter, your access to our website or from transactions you make. We take reasonable steps to be transparent about how and why we collect personal data.

We may also collect your personal information from joint account holder(s) or third parties including public sources, your adviser(s), employer (or its affiliates), agents, introducers,

referrers, brokers, our related companies and service providers (including credit reporting bodies and information service providers).

How we store your information

We keep personal information in physical and electronic records, at our premises and the premises of our service providers, which may include processing or storage in the cloud, which may mean in practice that this information is stored outside Australia. Where this occurs, we take steps to protect the security and integrity of personal information.

We also keep records of our interactions with you (including by telephone, email and online) and of your transaction history.

How we use your information

We use personal information about you for the purpose for which it was provided to us, including to:

- process applications
- administer and manage our products and services (including monitoring, auditing, and evaluating those products and services)
- model and test data (in a controlled environment)
- develop scores, risk assessments and related analytical tools
- communicate with you and deal with or investigate any complaints or enquiries

We may also:

- anonymise your data for our own purposes including market research, new product development and fraud mitigation
- use or permit our affiliates to use your personal information for related purposes to the extent that it is lawful to do so without your express permission. For example, we may from time to time use your personal information to inform you or your employer of investment opportunities or to provide information about products and services which we expect may be of interest to you. However, if you don't want to receive such communications you can tell us by using any of the methods listed below.

While we may sometimes - where it is lawful and with your permission if necessary - share personal information with companies we do business with (e.g. in product development, joint venture arrangements or distribution arrangements), we do not sell personal information for marketing purposes to other organisations or allow such companies to do this.

When your information is disclosed

Subject in all cases to local law, we may share personal information within Essential Wealth, and may disclose personal information outside Essential Wealth:

- as required by law or regulations, such as those relating to anti-money laundering and counter-terrorism financing or as required by a regulator
- to our service providers, who provide services in connection with our products and services (including archival, auditing, accounting, customer contact, legal, business consulting, banking, payment, delivery, data processing, data analysis, information broking, mailing, marketing, research, investigation, insurance, identity verification, brokerage, maintenance, trustee, securitisation, website and technology services)
- to our affiliates
- to your nominated financial adviser with your permission
- as contained in the terms and conditions of any specific product or service.

We may also disclose your personal information (on a confidential basis) in connection with the undertaking of our principal investment activities including, but not **limited** to, acquisitions, mergers, and the management of any parts of our business or assets (including divestments), and the provision of any debt to another party.

In some circumstances the parties to whom we disclose personal information may operate outside of Australia or, in the case of data collected within the European Union, outside the European Union this includes locations in the countries listed in the Appendix. Where this occurs, we take steps to protect personal information against misuse or loss and to comply with local law in respect of the transfer of your data from one jurisdiction to another. Those parties, in turn, may make such information available to the governments of such other countries in accordance with local law requirements.

Keeping information accurate and up to date

We take reasonable steps to ensure that all information we hold is as accurate as possible. You are able to contact us at any time and ask for its correction if you feel the information we have about you is inaccurate or incomplete.

Keeping information secure

We use security procedures and technology to protect the information we hold. Access to and use of personal information within Essential Wealth seeks to prevent misuse or unlawful disclosure of the information this includes internal policies, auditing, training and monitoring of staff.

If other organisations provide support services, we require them to take appropriate technical and organisational measures to secure the privacy of the information provided to them.

How you can access or correct your information

You can contact us to request access to or correction of your personal information. In normal circumstances we will give you full access or make the requested corrections to your information. However, there may be some legal or administrative reasons to deny these requests. If your request is denied, we will provide you with the reason why (if we can). Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

Dealing with Essential Wealth online

When you visit Essential Wealth websites you will generally browse anonymously unless you have logged into a client portal or accessed the website from a personalised communication from Essential Wealth.

For all visitors to our website, we use cookies and other web browser technologies to collect information such as the server your computer is logged on to, your browser type (for example, Internet Explorer, Chrome or Firefox), and your IP address. (An IP address is a number that is assigned to your computer automatically and required for using the Internet). We may also derive the location associated with an IP address.

Once you have logged into a Essential Wealth portal, accessed our website from an e-mail or other personalised communication sent to you, or provided us with personal information by completing a form online, we may be able to identify you and we may combine that with other information in order to provide you with a better online experience. If you would prefer not to be identified you can delete the cookies and reconfigure the cookie preferences on your internet browser (see below).

Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. While cookies are not considered personal information, they are generally used on Essential Wealth sites to:

- access online services - if you log into our secure areas on our website we will use cookies to authorise your access and save your preferences
- manage advertising - when you see one of our ads on a third party website, cookies are sometimes used to collect anonymous information about the page you visit and the type of software you are using

- monitor traffic - we use anonymous information to track how people are using the Essential Wealth site. This may include time of visit, pages visited and some system information about the type of computer you are using
- monitor your use of our website - if we have identified you as a result of you logging into a Essential Wealth client portal, accessing our website from a personalised communication or providing us with personal information by completing a form online, we may use cookies to collect personal information about you.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the Help menu of your browser to learn how to change your cookie preferences).

If you disable the use of cookies on your web browser or remove or reject specific cookies from Essential Wealth websites or linked sites, then you may not be able to gain access to all of the content and facilities on those websites.

Your rights if you are in the EU

As provided for in the General Data Protection Regulation, you have the right to access your data; to correct or rectify your data; to delete your data subject to applicable law; to have your data processed only in accordance with applicable law; to have copies of your data to be moved to another controller; to object to our processing your data otherwise than in accordance with the law; and to withdraw any consent to our processing your data at any time. Please email afsl@essentialwealth.com.au to exercise any of those rights.

Contact us

If you have any questions or complaints regarding privacy or information handling, please write to afsl@essentialwealth.com.au or contact us by phone. Please mark communications to the attention of our Privacy Officer. We will respond to let you know who will be handling your matter and when you can expect a further response.

If your concerns are not resolved to your satisfaction, you may be able to escalate your complaint to an external dispute resolution scheme or to a regulatory authority (if you are in the EU, you may contact one of the EU data protection regulators found here: http://ec.europa.eu/newsroom/article29/item-detail.cfm?item_id=612080). We can also provide details of the appropriate scheme/regulator for you, as these may vary by jurisdiction or product.

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