



# Compliance Policy

## Privacy Policy & Procedures

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### 1. Our Privacy Policy

This policy applies to Entrust Wealth Management Pty Ltd (Entrust) and all our representatives. It explains our policy in relation to the collection and management of personal information we collect from individuals. The Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act) and the subsequent 2012 and 2016 amendments (mandatory Data Breach Notification), and the General Data Protection Regulation (GDPR) requires us to handle personal information in accordance with these Principles.

### 2. Collection of information

*What is collected and why we collect it.*

Personal information means information, or an opinion about, an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion. We are an Australian Financial Services Licensee (“AFSL”). When we provide you with financial services, we may be required by the *Corporations Act* and regulatory requirements to seek to obtain certain personal information about you, including, but not limited to, your:

- Name, date of birth, contact details and tax file number.
- Employment details and employment history.
- Financial details.
- Details of your investment preferences and attitude or tolerance to investment and financial risk.
- Information about your financial needs and objectives.
- Information about your employment history, employment circumstances, family commitments and social security eligibility.

#### *Sensitive information*

We may also need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health information, racial information, genetic information, etc. We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you and dealing with you.

#### *How is information collected?*

We collect personal and sensitive information in a number of ways, including:

- Directly from you, such as when you provide the information at meetings, by phone, email, in data collection forms and when you visit our websites. Our website may use programs to record traffic to our website. This allows us to see what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to disable such functionality.
- From our Newsletter we can track usage and reading to see which areas are of particular interest. This enables Entrust to incorporate more articles of a similar nature.
- Indirectly from financial institutions once you have authorised us to obtain such information or authorised other parties to provide us with this information.
- We may also receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy. You have the right to refuse us authorisation to collect information from a third party.

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- Sometimes you may provide us with someone else's personal information. E.g. other members of your family group. You must not do this unless you have their consent to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

### *Are you obliged to provide us with personal information?*

You are not required to provide us with the information that we request, or to allow us to collect information from third parties. However, where you choose not to provide us with the information we request, we may not be able to provide you with services that you have requested from us, and we may elect to terminate our arrangement with you. Importantly, if you provide either inaccurate or incomplete information to us you risk obtaining products or services that may not be appropriate or suitable for your needs and you may risk suffering a financial detriment or financial loss.

### *What happens if we obtain information about you which we have not solicited?*

Where we receive unsolicited personal information about you, we will consider if we could have collected the information if we had solicited the information. Where we determine that we could have collected the personal information from you, we will treat your personal information in the same manner as if we have solicited the information directly from you. Where we determine that we could not have collected the personal information, we will destroy the information or ensure that the information is de-identified as soon as practicable.

## 3. Use of information

We use your personal information for the primary purpose for which the information was obtained. As an AFS licensee, that will typically mean for the purpose of:

- Providing financial services to you.
- Implementing investment or risk management recommendations on your behalf.

We may also use the information for the secondary purpose of attempting to identify other products and services that may be of interest to you.

### *Do we disclose personal information for marketing?*

We may use your personal information to offer you products and services that we believe may interest you. We may also disclose your personal information to external associates and service providers who assist us to market our products and services.

If you do not want to receive marketing offers from us please inform us by sending an email to [info@entrustwm.com.au](mailto:info@entrustwm.com.au) or calling 08 9476 3900.

## 4. Disclosure of information

*We may disclose your personal information to:*

- Our representatives and staff.
- The product issuers of products and services that you have elected to acquire, vary or dispose of using our assistance.
- Our external service providers.

For example, information may be disclosed to the following parties:

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- Product issuers for the purpose of giving effect to the recommendations made by us, and other organisations who support the products and services we offer.
- Other parties involved in the administration of your financial products or insurance cover (e.g. custodians, actuaries, call centres, mail houses, product registries, claims assessors etc.).
- Our external service providers (e.g. IT providers, professional advisers and contractors).
- Government and regulatory authorities and other organisations, as required or authorised by law.
- Any person considering acquiring, or acquiring an interest in our business.

### 5. Government related identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party.

### 6. Cross-border disclosure of personal information

We do not currently directly disclose your personal information overseas however some third party service providers we may engage with from time to time may have registered overseas locations.

### 7. Storage and security of information

We store personal information in our computer database and hard copy files. We take reasonable steps to ensure the personal information collected and held by us is protected from misuse, interference, loss, unauthorised access, modification or disclosure.

Where we employ data processors to process personal information on our behalf, we only do so on the basis that such data processors comply with the requirements under the Australian Privacy Act and GDPR and that have adequate technical measure in place to protect personal information against unauthorised use, loss and theft.

In the event you cease to be a client of ours, any personal information which we hold about you will be maintained for a period of not less than 7 years in order to comply with legislative and professional requirements.

You acknowledge that personal data that you submit for publication through our websites or services may be available, via the internet around the world. We cannot prevent the use (or misuse) of such personal data by others.

### 8. Access and correction of information

You may request access to the personal information we hold about you, and we will respond within a reasonable period after the request is made. Where we provide you with access to such information, we may charge a reasonable fee to cover our costs. We will disclose the amount of such costs to you prior to providing you with the information.

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We will take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, up-to-date, complete and relevant. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate or incomplete, you may contact us to correct the information.

If we disagree about the correction you have supplied, and refuse to correct the personal information, or if we believe that we are unable to comply with your request to access the personal information that you have provided us, we will give you a written notice to that effect. You have a right to make a complaint if you disagree with our decisions in relation to these matters (see below).

### 9. Your rights under the GDPR

If you are an individual residing in the European Union (EU), you have certain rights as to how your personal information is obtained and used. Entrust complies with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU.

Except as otherwise provided in the GDPR, you have the following rights;

- a) To be informed how your personal information is being used;
- b) Access your personal information (we will provide you with a free copy of it);
- c) To correct your personal information if it is inaccurate or incomplete;
- d) To delete your personal information (also known as ‘the right to be forgotten’);
- e) To restrict processing of your personal information;
- f) To retain and reuse your personal information for your own purposes;
- g) to object to your personal information being used; and
- h) to object against automated decision making and profiling.

Please contact us at any time to exercise your rights under the GDPR at the contact details in this Privacy Policy.

We may ask you to verify your identity before acting on any of your requests.

### 10. Complaints

If you believe that we have breached the Australian Privacy Principles, or disagree with a decision that we have made in relation to our Privacy Policy, you may lodge a complaint with us. To enable us to understand and deal with your complaint in a timely fashion you should set out a brief description of your privacy problem, the reason for your complaint and what action or remedy you are seeking from us. Please address your complaint to the Head of Risk at [compliance@entrustwm.com.au](mailto:compliance@entrustwm.com.au).

Your complaint will be investigated and responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

### 11. Policy updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website ([www.entrustwm.com.au](http://www.entrustwm.com.au)) or by contacting us.