

## PARTNERS WEALTH GROUP PRIVACY POLICY

This Privacy Policy applies to Partners Wealth Group Pty Ltd (ABN 17 140 105 077) and our subsidiaries and related entities (“we”, “us”, “our” or “Partners Wealth Group”).

This includes, but is not limited to, Partners Wealth Group Advice Pty Ltd, Partners Lending Pty Ltd, Partners Legal Pty Ltd, Partners Superannuation Services Pty Ltd, Partners Technical Superannuation Services Pty Ltd, PRPIA Pty Ltd and Partners Private Pty Ltd. For more information about Partners Wealth Group, including a complete list of Partners Wealth Group entities, please visit [www.pwg.com.au](http://www.pwg.com.au).

Partners Wealth Group is committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**). All Partners Wealth Group entities must follow the Privacy Act and Australian Privacy Principles (APPs). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

**IMPORTANT:** We do not sell, trade, or rent your personal information to others for any reason.

### Your consent

By asking us to provide you with services, you consent to the collection and use of your personal information in accordance with this Privacy Policy.

### Personal information we collect and hold

We collect personal information about you when you contact us, use our services, visit our website or deal with us in some other way. We will only ask you for the information we reasonably need to provide our services to you. During the course of providing our services, we may collect and hold a range of personal information, including:

- Information about your identity — including your name, address, telephone number, date of birth, gender and marital status, tax file number, tax residency status and occupation;
- Information that we require to identify you, including passport, driver’s licence or other documentary evidence as required by law;
- Financial and transaction information (including information about your assets and financial situation);
- Information regarding your interactions with us;
- Information about the services you have purchased from us or which you have enquired about, together with any additional information necessary to deliver those services or to respond to your enquiries;
- Information that you provide to us directly through our network or indirectly through our network or website;
- When you visit our website — your location information, IP address, mobile device, network information and any third-party sites you access; and
- Other personal information we require from time to time to manage your business relationship with us.

We may also collect information about you from other people and organisations, such as:

- Other Partners Wealth Group entities;
- Our authorised representatives;
- Your representatives - solicitors, brokers, conveyancers, agents and medical professionals;
- Your employer or ex-employer;
- Third party companies or agencies such as referral partners;
- Law enforcement agencies and other government entities; and
- Publicly available sources of information (e.g. public registers or social media).

For example, if you apply for credit, we may ask a credit reporting body for your credit report. If you apply for life or income protection insurance, we might ask you or your doctor for your medical information.

The Fold’s Product Licence Terms and Conditions are available from our website at: <http://www.thefoldlegal.com.au/product-licence-terms-conditions>.

## **Sensitive information**

The Privacy Act protects your sensitive information — such as information about your religion, ethnicity, health or biometrics (for example, your fingerprints). We may collect sensitive information directly from you, such as basic health information when applying for life insurance. We will only collect the above information with your permission (except as permitted by law) and where it is necessary for the purpose of providing our services to you.

## **Why we collect, hold, use and disclose personal information**

We're careful about how we use your information. We use it to deliver our services, and for other reasons such as to better understand you and your needs and to let you know about other products and services you might be interested in.

We collect, hold, use and disclose your personal information in order to:

- Confirm your identity;
- Provide our services to you and deliver the best possible quality of customer experience (such as by gaining an understanding of your needs);
- Assess your application for a product or service;
- Design, manage, price and provide our products and services;
- Manage our relationship with you;
- Minimise risks and identify or investigate fraud and other illegal activities;
- Contact you, for example, when we need to tell you something important;
- Improve our service to you and your experience with us;
- Comply with laws, and assist government or law enforcement agencies;
- Manage our businesses;
- Provide you with news, information or advice about our existing and new products and services, including for marketing;
- Communicate with you, including but not limited to, by telephone and email;
- Personalise and customise your experience with us;
- Conduct business processing functions for operation of our website and our business;
- Administrative, promotional, planning, product/service development, quality control and research purposes, or those of our contractors, external service providers or business partners;
- Investigate any complaints about or made by you, or if we have reason to suspect that you may have been engaged in any unlawful activity; or
- As otherwise required or permitted by any law (including the Privacy Act).

## **Who we share your personal information with**

We may share your information with other Partners Wealth Group entities. This helps us offer you a high-quality customer experience. We may also share your information with third parties for any the purposes outlined above, or where the law otherwise allows. These third parties can include:

- Service providers — including insurers, mortgage brokers, lenders and product providers;
- Our authorised representatives;
- Businesses who perform work for us — including direct marketing, document production, debt recovery and IT support;
- Brokers, agents, advisers and other people who act on your behalf;
- Guarantors and other security providers;
- Organisations involved in our funding arrangements — like loan purchasers, investors, advisers, researchers, trustees and rating agencies;
- People who help us process claims — like assessors and investigators;
- Banks and financial institutions — for example, if we need to process a claim for a mistaken payment;
- Our auditors; and insurers;
- Current or previous employers — for example, to confirm your employment;
- Government and law enforcement agencies or regulators;

- Credit reporting bodies and credit providers;
- Organisations that help identify illegal activities and prevent fraud;
- Other people (like cardholders) using the same account; and
- Industry associations and governing bodies.

### **Sending information overseas**

Sometimes, we may have to send your information overseas, including to:

- Our staff in the Philippines who support the administration of applications;
- Service providers or third parties who store data or operate outside Australia;
- Complete a transaction, such as an international money transfer; or
- Assist government or law enforcement agencies.

If we have to send your information overseas to a country that is not regulated by laws that protect your information in a way that is similar to the Privacy Act, we will take reasonable steps to ensure that your information is protected in the same way that we do, or we will seek your consent before disclosing your information to them.

### **Use of cloud services**

We make use of cloud computing services for a numbers of functions including, but not limited, to CRM systems, financial modelling, data storage, email, marketing, document execution, lending, workflows and audit. This information is generally hosted on Australian servers, but may from time to time be stored outside of Australia. Where it is necessary to host this information in places outside of Australia, we will seek confirmation that the hosting service provider is regulated by laws that protect your information in a way that is similar to the Privacy Act.

### **Cookies**

We may use technology such as cookies, beacons, tags, scripts and tracking pixels to collect, store and use anonymous data about how you use our website. This includes your server address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data allows us to increase website functionality, diagnose problems, monitor the services you use, analyse trends and search patterns, display content that is tailored to our understanding of your interests, provide you with an improved and more personalised service, test and improve the quality of our products and services, gather broad demographic information and conduct targeted online advertising. This information alone cannot be used to discover your identity.

### **What happens if you don't provide your personal information to us**

The provision of your personal information will generally be necessary for us to provide our services as requested by you. If you choose not to provide us with certain personal information described in this Privacy Policy, some or all of the following may happen:

- We may not be able to provide you with the services you requested, either to the same standard, or at all;
- We may not be able to continue our business relationship with you; or
- Your experience with us may not be as enjoyable or useful.

### **How we store and protect your personal information**

We strive to maintain the relevance, accuracy and completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.



We encrypt personal information and store it electronically. Physical records are securely stored and destroyed in line with regulations. Personal information is deidentified and destroyed after 7 years if we are no longer providing you with services.

We will take all reasonable steps to protect the personal information that we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure, including by means of firewalls, password access, secure servers and encryption of credit card transactions.

If you suspect any misuse, interference, loss, unauthorised access, modification or disclosure of your personal information, please let us know immediately.

### **Accessing and correcting your personal information**

You may ask us for access to your personal information and to correct it at any time.

Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree that the information is inaccurate, irrelevant, out of date or incomplete.

We do not charge for providing access to or correcting your personal information. To access or correct your personal information, please write to [issue@pwg.com.au](mailto:issue@pwg.com.au).

### **Complaints and further information**

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Head of Risk and Compliance at [issue@pwg.com.au](mailto:issue@pwg.com.au) or telephone 03 8508 7800 and provide details of the incident so that we can investigate it.

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint. We may contact you during the process to seek further clarification if necessary.

You are also free to complain to the Office of the Australian Information Commissioner (**OAIC**) about the way we handle your personal information.

Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
Phone [1300 363 992](tel:1300363992)  
Visit [oaic.gov.au](http://oaic.gov.au)

### **Contact Us**

For more information about this Privacy Policy, please contact us at:

Head of Risk and Compliance  
Level 13, 636 St Kilda Road  
Melbourne VIC 3004  
Telephone: 03 8508 7800  
Email: [issue@pwg.com.au](mailto:issue@pwg.com.au)



### **Updating this policy**

This Privacy Policy was prepared on 26<sup>th</sup> April 2021. We may update it at any time. We will always publish the updated version on our website [www.pwg.com.au](http://www.pwg.com.au).

