

**AKAMBO PTY LTD**  
**&**  
**JOINT VENTURE PARTNERS**



**Privacy Policy**  
**May 2018**  
**Version 2.0**

## **1. Akambo Pty Ltd Privacy Policy**

Your personal information is protected and Akambo Pty Ltd abides by the Australian Privacy Principles established under the Privacy Act, 1988. A summary of the Australian Privacy Principles is available by contacting our office.

This policy applies to Akambo Pty Ltd and our Joint Venture partners. In this Privacy Policy ‘Akambo’, ‘we’, ‘us’, or ‘our’ have the same meaning and refers to Akambo Pty Ltd and the joint venture partners included on page 1.

This policy explains how we will use and manage your personal information. It also describes in general terms, how personal information is collected, the sorts of personal information held as well as the purposes for which it may be used and disclosed.

We will review and update this policy from time to time to make sure it remains appropriate should there be a material change to our business operations or law. We reserve the right to notify you by posting an updated version of the policy on our website. We will be governed by the most current Akambo Pty Ltd Privacy Policy regardless of whether or not we have given you specific notice of any change.

## **2. The kinds of personal information that we collect**

As a financial planning organisation, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you (“personal information”). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you.

We may collect the following types of personal information:

- Name;
- Email address, mailing or street address and other contact details;
- Date of birth;
- Information to verify your identity such as your driver’s licence number;
- Tax file number;
- Bank account details to enable payment of distributions or redemptions;
- Employment details and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- Information about other products or services that you may use or hold
- Details of your investment preferences and aversion or tolerance to risk;

We are required to collect your name, address, date of birth and other verification information under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

We are authorised to collect tax file numbers under tax laws and the Privacy Act.

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request and it may also affect our ability to properly analyse your personal circumstances and provide appropriate advice to you.

As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

### **3. How we collect personal information**

Generally, collection of your personal information will be directly from you, effected in either face to face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods. In some cases, we may collect your personal information from external sources. Examples of the people or organisations that may provide us with information are:

- Persons authorised by you (such as accountants or lawyers)
- Third-party brokers (such as insurance and mortgage brokers)
- Employers and superannuation funds (as authorised by you)

We only collect your information from external sources if it is impractical to collect it directly from you, or when you direct us to do so.

### **4. The purposes for which we collect personal information**

We are required by law to collect information to identify and verify you. We therefore may make enquiries as to your identity and other personal details as required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Other than as required by law, we will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:

- The preparation of your financial plan;
- The provision of financial planning advice to you as requested by you or from time to time as we believe appropriate;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- The potential dissemination of information to a new Financial Services Licence in the event a representative changes to such a new licence in accordance to terms of his/her employment.

### **5. Dealing with personal information**

We will not use or disclose Personal Information collected by us for any purpose other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

Generally, Akambo uses systems and services located within Australia. From time to time we may send your information to recipients located overseas, including to related parties and service providers or other third parties who operate or hold data outside Australia. We may also send information overseas to complete a particular transaction or matter where this is required by the laws and regulations of Australia or another country.

Where your information is sent overseas, it is likely to be one of the following countries:

- Philippines
- United States
- Switzerland
- United Kingdom
- Hong Kong
- New Zealand
- Singapore

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us, request not to receive such information and we will give effect to that request. Please use the contact details at the end of this policy if you wish to opt-out of receiving marketing communications from us.

Please note that, if we are currently providing you with services or products, we will still need to send you essential information about your account, the relevant services or products and other information as required by law.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

## 6. How we keep personal information secure and current

Your personal information is generally held in your client file and in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets, which are locked out of hours. All record movements off premises are recorded in a central register. Access to our premises is controlled. All computer based information is protected through the use of access passwords on each computer and screen saver passwords. We also use security procedures such as firewalls and anti-virus technology to prevent unauthorised access. Data is backed up each evening and stored securely off site.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed or de-identified.

## 7. Accessing your personal information

You may at any time, by contacting us, request access to your personal information and we will reasonably provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. If the information sought after is extensive we may charge a fee to cover cost.

We will endeavour to ensure that, at all times, the personal information about you, which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your Request is urgent please indicate this clearly.

## **8. Anonymity**

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our products, however in most cases it will be impracticable for us to assist you if you remain anonymous or use a pseudonym.

## **9. Privacy enquiries and complaints**

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Compliance Manager. We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Your complaint will be considered within 7 days and responded to. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

### **AKAMBO PTY LTD - CONTACT DETAILS**

Akambo Pty Ltd - Compliance Manager:

Address: Level 14, 379 Collins Street Melbourne, Victoria, 3000  
Telephone: 03 9602 3233  
Facsimile: 03 9602 5009  
e-mail: [compliance@akamboFG.com](mailto:compliance@akamboFG.com)

### **OFFICE OF THE VICTORIAN PRIVACY COMMISSIONER**

Director of Privacy Case Management

Post: GPO Box 5218, Sydney NSW 2001  
Telephone: 1300 363 992  
Facsimile: 02 9284 9666  
e-mail: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Website: <https://www.oaic.gov.au/>