



Financial Spectrum



Privacy Policy

April 2009

AFSL: 334400

ABN: 57 134 661 706



Our commitment

Your privacy is important, and Financial Spectrum Pty Ltd is committed to protecting any personal and sensitive information that you provide to us. This document explains what information Financial Spectrum obtains from you, how we obtain and use that information, and how we safeguard your privacy.

We are bound by and committed to upholding the National Privacy Principles set out in the Privacy Act 1988.

Information we collect

Financial Spectrum needs to obtain personal and possibly sensitive information from you to provide you with financial services and products. Without this information we may not be able to provide you with these services.

> Personal information

If you are a client of Financial Spectrum, or wish to become one, we collect information about you that is relevant and necessary in order for us to provide you with quality advice. The types of information we collect will depend upon the type of advice you request and may include information about your personal objectives, financial position, health, lifestyle and financial needs. Your Financial Spectrum adviser will request this information from you.

> Sensitive information

If we are providing you with advice on personal life insurance, we also collect health, medical and lifestyle which may include information about sexual preferences and practices. This information is collected for life insurance providers to enable them to assess your life insurance application. We will ensure that this sensitive information is held in locked storage and only accessed by personnel who require this information to process your insurance application.

Your Tax File Number (TFN) is governed by special legislation and is also protected when you provide it to us.

We will not obtain, use or disclose information about your racial or ethnic origin, political opinions, memberships of a political association, religious beliefs or affiliations, philosophical beliefs, memberships of a professional or trade association or trade union or criminal record unless you have given us written consent to do so or unless required by law.

How we collect information

Financial Spectrum collects personal and sensitive information when you complete a Personal Client Profile data collection document or an application form, when you give us information by telephone or internet, or through discussions with your Financial Spectrum adviser, accountant or lawyer.

We may also collect information from our website (www.financialspectrum.com.au) for internal purposes but not information that can identify you. This may include the number of users who visit the site, date and time of visits, number of pages viewed and traffic patterns. To collect this information we use 'cookies', or small computer data files that are saved on your hard drive. These cookies do not contain any personal identifying information.

In addition, we may collect information about you on behalf of another person such as your spouse, your children, or the name of a friend or colleague that you may decide to refer to us. In this case, it is your responsibility to tell them of your disclosure and that they may access their information held by Financial Spectrum.

Use and disclosure of information

The information you give us is confidential for use within the Financial Spectrum group of companies.

We will not reveal, disclose, sell, distribute, rent, licence, share or pass your information to third parties, other than to service providers contracted to Financial Spectrum under strict confidentiality arrangements. Disclosure to service providers—such as fund managers, mailing houses or administrators—may be necessary for you receive services from us.

Your Financial Spectrum adviser will also have access to the information that you provide to us, until you tell us that you no longer have a relationship with that adviser. It is important that you understand that we reserve the right to appoint another Financial Spectrum adviser from time to time. In these circumstances we will inform you of the change. We may also provide information to your accountant or lawyer when required to implement financial advice, or on request.

Financial Spectrum may also use your personal information to communicate with you about your investments, to tell you about new products and services that may be useful to you, or to send you newsletters. If you do not wish to receive this information, please notify us so that we can remove you from our mailing list.

Security of information

We will take all reasonable security measures to protect the personal and sensitive information that we collect and hold from misuse, loss and/or unauthorised access, modification or disclosure. Paper files are stored in lockable cabinets. Only personnel with security passes can gain access to our premises outside of business hours. All computer-based information is protected through the use of access passwords on each computer. Data is backed up each evening and stored securely offsite.

In the event that you cease to be a client of Financial Spectrum, any personal or sensitive information that we hold about you will be maintained in a secured premises for a period of 7 years in compliance with legislative and professional requirements. After this period, the information will be destroyed.

Access to your personal information

Generally, you may access any personal or sensitive information Financial Spectrum holds about you by contacting us. If applicable, a fee may apply for any costs incurred such as photocopying, administration and postage costs. All access requests will be completed within thirty (30) days.

Anonymity

The nature of financial services does not lend itself to treating clients with anonymity. All transactions require personal information about the individual for whom the transaction is being completed. In some cases, however, such as handling enquiries about our services from potential clients, we can do so anonymously.

Complaints resolution

We are committed to providing clients and prospective clients whose personal information we hold, a fair and responsible system for the handling of complaints.

If at any time you have any concerns or complaints in relation to your privacy you should take the following steps:

1. Contact us on 02 8238 0888
2. If we cannot reach a satisfactory resolution, you may refer your concerns to the Office of the Federal Privacy Commissioner on 1300 363 992 or online at www.privacy.gov.au who may investigate your complaint further.

Contacting Financial Spectrum

You can contact Financial Spectrum by:



Calling 02 8238 0888 9am—5pm Monday to Friday;



Visiting our website at www.financialspectrum.com.au



Writing to us at:

Financial Spectrum Pty Ltd

GPO Box 4812

Sydney NSW 2001



Sending us an e-mail at info@financialspectrum.com.au



Sending us a fax at 02 8238 0808