

McCorquodale & Co

Privacy Policy

<i>Version</i>	<i>Date</i>	<i>Amendment</i>
1.1	<i>29th June 2017</i>	-

1. Overview

McCorquodale & Co Pty Ltd (**We, Company**) adheres to the Australian Privacy Principles (**APPs**) and is committed to protecting your privacy. The purpose of this Privacy Policy is to outline how we collect, use, disclose and retain personal and sensitive information. It also sets out how you can make a complaint and how you can access the personal information we hold about you. This privacy policy is reviewed annually (unless an update is required earlier).

2. Responsibility

The responsible manager will be responsible for meeting the obligations for having adequate resources.

3. What is personal information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. For the purposes of this policy, personal information may include:

- a) name;
- b) address;
- c) nationality;
- d) residency status;
- e) e-mail address;
- f) Tax File Number; and
- g) financial information.

4. Collection of personal information

4.1 Collection of personal information

We may collect and hold personal information for the purposes of enabling us to provide financial services to you. For example, for us to provide personal advice to you, we are required to verify your identity and obtain information relating to your financial situation and your personal goals and objectives – this is so we can assess your personal situation and provide you with appropriate financial advice. This information is generally collected directly from you as our client.

Any personal information collected by us is solely for providing services to its clients and will not be disclosed unless the disclosure is required in the performance of those services (for example, disclosing your information to a financial institution in order to place an investment on your behalf). Where we obtain sensitive information (eg. racial or ethnic origin, political opinions, religious beliefs or affiliations **or** criminal record), we will only do so with your consent and where the collection of such information is reasonably necessary for us to perform our function.

We will only collect personal information by lawful and fair means. In general, we collect personal information about you from you unless you consent to the collection

of your personal information from someone else or it is unreasonable or impracticable to do so. In some instances, we may collect this information through third parties such as your family members, people authorised by you or health professionals (eg. in the case of income protection insurance).

Any personal information held by us may be held in a number of ways including via hard copy, soft copy or offsite on electronic servers.

For example, we may collect personal information from you when you complete our client data form for the purposes of allowing us to provide you with financial advice or we assist you to acquire or dispose of a financial product (eg. invest in a managed fund or rollover your superannuation).

4.2 Dealing with unsolicited personal information

If we receive unsolicited personal information, we will within a reasonable period after receiving the information, determine whether or not we could have collected the information under Australian Privacy Principle 3 if the entity had solicited the information. If the information could not have been obtained under APP 3 we will take steps to destroy or de- identify the information as soon as practicable, if it is lawful and reasonable to do so.

4.3 Notification of the collection of personal information

At or before the time we collect personal information about you, or if that is not practicable, as soon as practicable after, we will take reasonable steps to ensure you are aware of:

- a) who we are and our details;
- b) how we collect your personal information and whom from;
- c) whether the collection of your personal information is required or authorised by or under an Australian law or a court/tribunal order;
- d) the purposes for which we collect your personal information;
- e) the main consequences (if any) if we do not collect all or some of the personal information;
- f) any other person or body to whom we would disclose the personal information that we have collected;
- g) information about how you may access the personal information held by us about you and how you may seek correction of such information;
- h) how you may complain about a breach of the Australian Privacy Principles and how the entity will deal with such a complaint;
- i) whether we are likely to disclose the personal information to overseas recipients (if so where).

4.4 Anonymity and pseudonymity

Whilst you may wish to deal with us anonymously. However, this is likely to limit the services we provide to you as our principal business relates to the provision of financial services (and in most cases, the provision of personal advice) which would require individuals to provide personal information. We are also required under *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* to conduct customer due diligence and appropriately identify clients.

4.5 If you don't provide us with the information we request

It is your choice as to whether you wish to provide us with the information we request. However, given the nature of our business, we may not be able to provide you with the financial services you require if you don't provide us with the relevant personal information to help us review your personal circumstances.

5. Use or disclosure of personal information

If we collect personal information for a specific purpose (eg. to provide financial services to you), we will not use or disclose the information for another purpose unless you consent to the use or disclosure of the information or an exception in the APPs applies. For an outline of the exceptions, please consider Australian Privacy Principle 6.

5.1 Direct Marketing

We may use and disclose your personal information to keep you informed about the range of financial products and services that we think may be relevant or of interest to you. You can opt out of receiving direct marketing information from us at any time by contacting us.

5.2 Disclosure of information overseas

From time to time we may send your information overseas to our service providers or other third parties who operate or hold data outside Australia. Where we do this, we make sure that appropriate data handling and security arrangements are in place.

McCorquodale & Co utilizes the services of Microsoft and Office 365. This a cloud based service with servers in the United States of America.

6. Security and access to your personal information

6.1 Information accuracy

We take reasonable steps to ensure that all personal data collected is accurate, up to date and complete. You can ask us to correct any inaccurate information we hold or have provided to others by contacting us using the details in this policy. If the information that

is corrected is information we have provided to others, you can ask us to notify them of the correction.

6.2 Security of personal information

We take care to protect the security of your personal information. We may hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats. We take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals. Please note, we are required by law to retain your personal information for a specific amount of time. We will generally destroy or de-identify personal information if it is no longer required.

6.3 Access to and correction of personal information

You can contact us to access or correct any personal information we hold about you. However, in certain situations, we are permitted to refuse access to personal information. These situations include where:

- a) giving access would have an unreasonable impact on the privacy of other individuals
- b) giving access would be unlawful, or where denying access is required or authorised by an Australian law or a court order
- c) giving access is likely to interfere with law enforcement activities.

For other situations, please consider Australian Privacy Principle 12.

If we receive a request to access personal information, we aim to respond to that request in a reasonable timeframe. In general, we will not impose an access charge unless the request of access and correct personal information is excessively onerous.

If we refuse access to personal information, we will provide you with reasons as to why access was refused and provide you with information on how to lodge a complaint about the refusal.

7. Contact us

You may wish to contact us for the following:

- a) find out what personal information we hold about you;
- b) update or correct the personal information we hold about you;
- c) opt out of receiving direct marketing material
- d) make a privacy related complaint.

Should you wish to do so, please contact us on the details below:

Alistair McCorquodale
Ph: 0434 420 487 or alistair@mccorquodaleco.com.