

Introduction:

Safeguarding the privacy of your personal information is an integral part of the service provided by Strategy First. This Client Privacy Policy outlines the way in which Strategy First aims to protect your personal information and describes what personal information we hold about you, for what purposes, how we obtain and make use of that information and how we ensure your privacy.

The personal information you disclose to Strategy First will be collected, held, used or disclosed in accordance with the National Privacy Principles (NPP) established under the Privacy Amendment (Private Sector) Act 2002. This Privacy Policy sets out our commitment to those principles.

The information we collect and why:

As a financial planning organisation, we are subject to legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about your "personal information". To provide you with a comprehensive financial planning service, we need to obtain certain personal information, including:

- Employment details and employment history;
- Tax file number;
- Date of birth;
- Your financial needs and objectives;
- Current financial circumstances, including your assets and liabilities income, expenditure, insurance and super;
- Investment preferences and aversion or tolerance to risk;
- Family commitments and Centrelink eligibility;
- Your health (relates to some forms of risk management).

Failure to provide this information may affect the appropriateness of the advice we provide.

We will not collect any personal information about you, apart from what you have provided to us or authorised a third party to provide to us.

How we collect your personal information:

Generally, collection of your personal information will be gathered in person or by telephone, facsimile, mail, email or from third parties.

From time to time, additional and/or updated information may be collected through one or more of those methods.

We will only collect, maintain and use personal information about you if it is necessary for us to provide the services you have requested.

How we use your personal information:

The personal information you provide to us is confidential. This is for use only within Strategy First. It is primarily for the provision of services requested and the administration of that service.

We will not use your information for any other purpose than specified here unless you have given us your consent or it is for another related purpose that is within your reasonable expectations.

We will not reveal, disclose, sell, distribute, rent, licence, share or pass your information to third parties, other than to service providers contracted to Strategy First under strict confidentiality arrangements.

These would include your accountant or lawyer when required to implement financial planning advice or where we have your consent.

The exception is when Strategy First may be required by law to disclose certain information.

We will not use or disclose personal information collected by us for any purpose other than the primary purpose of collection unless:

- 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 National 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 abide by the Rules of Professional Conduct of the Financial Planning Association of Australia.

In doing so, we make sure certain information is available for inspection 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.

Strategy First may also use your personal information to communicate with you about your investments and to inform you about new products and services that may be of interest to you.

While law requires some communications, you can notify us at any time if you do not wish to receive this information.

Please allow two (2) weeks for your request to be actioned.

Whom we may disclose your information to:

We may disclose your personal information to superannuation fund trustees, insurance providers; IDPS (wrap) service providers, stockbrokers and product issuers for implementing the recommendations made by us.

We may also disclose your personal information to your accountant, lawyer or other adviser where you have authorised such disclosure.

Any representative of Strategy First may use your personal information. It is a condition of our agreement with each of our representatives adopts and adheres to this Privacy Policy.

In the event we were 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 information will be used or disclosed by them. In the event we sell our business, we may transfer personal information to the purchaser of the business. As a client, you will be advised of any such transfer.

How we protect your personal information:

Your personal information is held in your client file and in a computer database. At all times, we will seek to ensure your personal information is protected from misuse, loss, unauthorised access, modification or disclosure. Your personal information is confidential and any sensitive information is treated as highly confidential.

In the event you cease to be a client of Strategy First, any personal information, which we hold, will be maintained for a period of 7 years in order to comply with legislative and professional requirements. Thereafter, the information will be destroyed.

How to access your personal information:

As a client of Strategy First, you are entitled to access personal information we hold about you, provided access does not contravene privacy laws or reveal a commercially sensitive decision-making process.

Subject to the following exceptions, we will provide you with access to your information by providing you with copies of the information requested or allowing you to inspect the information requested. We will require you to provide evidence of your identity.

We will not give you access to personal information which would reveal any confidential formulae or the detail of any in-house evaluative decision making process, but may instead provide you with the result of the formulae or the process or an explanation of that result.

We will not provide you with access to your personal information if this:

- Would pose a serious threat to the life/health of a person;
- Would have an unreasonable impact on others privacy;
- Is frivolous or vexatious;

- Information relates to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- Would reveal our intentions in relation to negotiations with you in such a way as would prejudice those negotiations;
- Would be unlawful;
- Is required or authorised by law;
- Would be likely to prejudice certain operations by or on our behalf of an enforcement body or an enforcement body requests access not be provided on the grounds of national security.

In the event we refuse access to your personal information, we will provide you with an explanation for that refusal.

We will 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.

How to update your personal information:

We will endeavour to ensure at all times your personal information is up to date and accurate.

To ensure the information collected, used and disclosed by Strategy First is accurate, complete and up-to-date, we ask you immediately notify us in the event you change your contact details, such as your telephone number and address.

Contact us for any changes or complaints:

Please contact us if you would like more information, or would like to access, update or amend your personal information that Strategy First holds.

If you wish to complain about any breach or potential breach of this Privacy Policy or the National Privacy Principles, you should contact us.

Phone: (+612) 9091 0080 or
Email: contact@strategyfirst.com.au; or
Post: Strategy First Financial Planning Pty Ltd
PO Box 116, Brookvale BC NSW 2100

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 go to the Office of the Privacy Commissioner who may investigate your complaint further. If so, please contact the Privacy Commissioner, GPO Box 5218, Sydney NSW 2001, Phone: 1300 363 992.

Changes to this Privacy Policy:

Our Privacy Policy is current as at July 2011. Strategy First reserves the right to review and amend this Privacy Policy relating to how we handle your personal information from time to time and for any reason. We will update this policy to reflect any changes and notify you in that event.