Client Privacy Policy

Strategy First Financial Planning Pty Ltd

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 we aim to protect your personal information and 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.

As a business operating in Australia, we are required to adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), which regulate the collection, storage, use, and disclosure of personal and sensitive information. In addition, they also give individuals the right to access and correct any personal information that we have collected about them.

The information we collect and why

As a financial planning organisation, we are subject to legislative and regulatory requirements. This requires us to obtain and hold 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:

- Email, phone and address.
- Current Drivers Licence / Passport.
- Employment details and employment history.
- Tax File Number - *if you are on an Ongoing Fee Agreement*
- Date of Birth.
- Your financial needs and objectives.
- Current financial circumstances, including your assets and liabilities income, expenditure, insurance & super.
- Investment preferences & aversion or tolerance to risk.
- Family commitments.
- Dept. of Human Services (Centrelink) eligibility.
- Your health *(Relates to risk management).*

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

We also need to obtain personal information about you for us to satisfy our obligations under relevant legislation such as the Anti-Money Laundering and Counter Terrorism Financing Act 2006 ("AML-CTF Act").

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.

We may record client meetings and use an AI tool to produce a transcript and file note of the meeting, and other documents such as internal instructions to follow up agreed actions after the meeting. As with all your information, the transcripts and file notes use secure software and are stored in accordance with our stringent data security.

We will always advise you when we intend to record a meeting and seek your explicit consent to do so prior to starting the recording. You may decline to have any meeting recorded if you are not comfortable.

How we collect your information

Generally, collection of your personal information will be gathered in person, by telephone, mail, email, electronically or from a website requesting personal information.

We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

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 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.

From time to time, secure AI software may be used to create administrative efficiencies, for instance reporting on pending client administration and back-office tasks and creating correspondence following a meeting which has been recorded with your consent.

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 Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and about certain operations by or on behalf of an enforcement body.

We abide by the Rules of Professional Conduct of the Financial Advice Association 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.

Our website uses cookies, analytics, tracking pixels and session recording tools.

To whom we may disclose your information

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 Employee of Strategy First may use your personal information to provide the services you have engaged us for. 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 them to conduct 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. We may transfer personal information to the purchaser of the business. As a client, you will be advised of any such transfer.

We may disclose your information to overseas recipients where we have contracted transcript services to these parties. Any overseas parties to whom we disclose information are duly bound by the Australian Privacy Principle.

How we protect your information

Your personal information is held in our cloud-based client files in our highly secure computers. We do not have a server in the office. We have a paperless office. All paperwork is shredded after scanning. We have a clean desk policy before leaving each night.

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.

No employees are to email sensitive information about SFFP, clients or other employees to a personal email. No employee is to save sensitive information to a removable storage device, such as a USB drive, without prior approval by one SFFP Director.

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 to comply with legislative and professional requirements. Thereafter, the information will be destroyed.
Your secure Credit Card details are entered in NAB for processing, then shredded. If you stop your Ongoing Service Agreement, your TFN will be deleted.

Security Process for Change of Contact Details

If you change your email address, phone, or address, or ask us to withdraw funds from an investment account, we have a specific security process to ensure the request is legitimate and not from an online hacker.

What is a Notifiable Data Breach (NDB)?

A data breach happens when personal information is accessed or released without authorisation or is lost.

Data breaches can cause serious harm to the individuals whose personal information is affected. For example, a data breach could result in financial loss, or emotional distress.

If a Serious Data Breach Occurs

The NDB scheme requires Strategy First to notify any clients affected by these serious data breaches. This notice must include recommended steps that clients should take in response to a serious data breach. We must notify the OAIC (Office of the Australian Information Commissioner).

Strategy First has prepared a Data Breach Procedure to conduct assessments of suspected data breaches to determine if they are likely to result in serious harm.

Staff do not have remote access to email accounts, client files or other databases containing client data except on devices provided by and being the property of SFFP.

If you experience emotional distress from a data breach, there are support services that can help you.

https://www.oaic.gov.au/individuals/data-breach-guidance/what-to-do-after-a-data-breach-notification#support-services

How to access your 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 access to your 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 for negotiations with you in such a way as would prejudice those negotiations.
- Would be unlawful.
- 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 explain why. 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 information

We will always endeavour to ensure 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.

Clients who have opted in to our Newsletter emails can opt out of receiving them at any time by clicking the "unsubscribe" link at the bottom of our emails.

Our Email Lists are stored on a secure server. We do not, under any circumstances, sell our Email Lists.

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 Australian Privacy Principles, you should contact us.

P (+612) 9091 0080 or
E contact@strategyfirst.com.au; or
A Strategy First Financial Planning Pty Ltd
PO Box 7418, Warringah Mall NSW 2100

We will endeavour to resolve any complaint to your satisfaction. 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 5288, Sydney NSW 2001, Phone: 1300 363 992.

Changes to this Privacy Policy

Our Privacy Policy is current as at September 2026.

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.

A copy of our current Privacy Policy will be maintained on our website.

Accessing our Privacy Policy

We are committed to implementing and promoting
a Privacy Policy which will ensure the privacy and security of your personal information.

A copy of our Privacy Policy is available on our website:
http://strategyfirst.com.au/privacy-policy/

Our Privacy Policy contains information on how to access or request to correct your personal information, as well as procedures for making a complaint about a breach of the Australian Privacy Principles.