FAA Lending Privacy Policy

ACN: 159 398 866 ABN:65 159 398 866

1.1. **Our Commitment**

At FAA Finance Pty Ltd (also known as FAA Lending) we recognise that your privacy is very important. Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and Australian Privacy Principals (APPs) Privacy Amendment (Enhancing Privacy Protection) Act 2012 which replace the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000.

Our Privacy Policy sets out our commitment to those principles. We require all our staff (including our Authorised Representatives) to adopt our Privacy Policy.

A summary of the Australian Privacy Principles is available by contacting our office.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: www.afca.org.au
Email: info@afca.org.au
Telephone: 1800 931 678 (free call)1
In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

1.2. **Collection**

As a provider of financial services 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. In addition, our ability to provide you with a comprehensive service is dependent on us obtaining certain personal information about you, including:

a) employment details and employment history;
b) details of your financial needs and objectives;
c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation particulars;
d) details of your investment preferences and aversion or tolerance to risk;
e) information about your employment history, employment circumstances, family commitments and social security eligibility; and
f) health information (required for some types of insurance)

We are required pursuant to the

- Corporations Act 2001,
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006,
- Taxation Administration Act 1953,
- Australian Securities and Investments Commission Act 2001
- Superannuation Guarantee (Administration) Act 1992,
- Superannuation (Unclaimed Money and lost members) Act 1999

to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients as those acts are amended and any associated regulations and Rules of Professional Conduct of the Financial Planning Association of Australia (FPA).

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

Generally, collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. As part of our ongoing efforts to enhance our services, we may collect and use your personal information, including audio recordings of appointments, for the purpose of transcribing these interactions using AI technologies.

Additional and/or updated personal information may be collected through one or more of those methods as required.

Information may be received from 3rd parties such as accountants, solicitors or referring entities. This information will usually be information that we determined could have been collected from you directly. However, should we determine otherwise and the information is not contained in a Commonwealth record, we will as soon as practicably possible either destroy or de-identify it as long as it is lawful to do so.

1.3. Use and Disclosure

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:

a) the preparation of your Excelsior Plan;
b) the provision of advice to you;
c) making recommendations;
d) reviewing your Excelsior Plan;
e) reviewing securities and investment recommendations; and
f) risk management

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

a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
b) where you have consented to such disclosure; or
c) 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 FPA 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 (ASIC). 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 by any of the methods listed in point 7.10, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

We may disclose your personal information to another financial planner during periods when this office is unmanned or closed so that you can be assured of receiving a continued service.

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.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised 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 agent or 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.

It is not likely that personal information will be disclosed to overseas recipients. In the case that we were to disclose your personal information to an overseas recipient you will be made aware of the countries in which recipients are likely to be located if it is practicable to do so.

We may store your information in a cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

If we do disclose your personal information to an overseas organisation we will take reasonable steps to ensure that the overseas organisation complies with the APPs or the equivalent legislation in its jurisdiction.

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 mishandled or disclosed by them. In the event that a sale of our business is to take place and depending on the transaction type, the consent of the individuals concerned before the sale is made may be sort, all clients will be advised of the transfer of their personal information to the purchaser of the business.

1.4. Document Security and Storage

All data collected and any information transcribed using AI technologies will be stored securely and handled in accordance with the Australian Privacy Principles (APPs) and other relevant privacy laws. We will seek to implement appropriate technical and organisational measures to protect your data from unauthorized access, disclosure, alteration, or destruction.

1.5. Access and Correction

You may at any time, request access to your personal information by contacting your adviser (or Authorised Representative) or Privacy Officer. We will (subject to the following exceptions) 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. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

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

a) providing access would pose a serious threat to the life or health of a person;
b) providing access would have an unreasonable impact on the privacy of others;
c) the request for access is frivolous or vexatious;
d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
f) providing access would be unlawful;
g) denying access is required or authorised by or under law; and
h) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that 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 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 and we will, if we agree that the information requires correcting, take all reasonable steps to amend the information.

We will endeavour to respond to any request for document 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.

1.6. Identifiers

Generally, we will not adopt or use an identifier (e.g., TFNs, Medicare numbers, etc) that has been assigned by a government agency and may be provided by you to group, sort or identify people. We will only disclose the information to another entity where you authorise that disclosure or where we are required to do so by law (e.g. tax File Numbers to product issuers or trustees of superannuation fund).

1.7. Information Collected Online

Financial Advisers Australia's web site may contain links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

While it is not necessary to register your personal details to use our Web site, we do offer a registration service which will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address.

If you have registered with us and you wish to update your registration details or decide, at any time, that you

do not wish to receive any further information from us, you can give effect to this by following the instruction on the website or by contacting us directly.

Our Web site may use cookies which allows us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

1.8. Privacy Complaints

This Privacy Policy and the legislation which governs it has been established to promote and protect your privacy rights. If you believe your personal information has been mishandled or there has been a breach of privacy, you may lodge a complaint directly with our Privacy Officer by contacting us on the details below. Your complaint will be thoroughly investigated and responded to within 5 working days. We endeavour to satisfactorily resolve all complaints and encourage our clients to resolve complaints directly with our organisation, however, if you are unhappy with our response, you are entitled to escalate your complaint to the Office of the Australian Information Commissioner.

1.9. Consent and Transparency

By using our services, you consent to the collection, use, and disclosure of your personal information as described in this policy. We are committed to transparency and will ensure that you are informed about how your information is being used. If you have any concerns or questions about our use of AI transcription services, please contact us.

1.10. Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy in accordance with legislative changes and our business requirements.

1.11. Contact Us

If you have any further enquiries regarding privacy issues or require further information relating to our Privacy Policy, please contact our office.

Address:	Suite 3, Level 5, Tower 2, 55 Plaza Parade, Maroochydore QLD 4558
Telephone:	(07) 5451 0022
Email:	admin@faa.net.au

1.12. Additional Privacy Information

Further information on privacy in Australia may be obtained by visiting the website of the Australian Information Commissioner at www.oaic.gov.au