

Financial Services Guide

Issued 30 January 2023

About this guide

This Financial Services Guide (FSG) explains the financial services provided by RI Advice Group and your adviser (who is authorised through RI Advice Group). It is designed to help you make a fully informed decision about whether you want to use our services.

Please take the time to read this guide carefully. Sound financial advice is based on open communication. Understanding our services and our fees is the cornerstone of this communication.

It's also important that you know who authorises your adviser, the nature of their associations and relationships and what to do if you have a complaint.

If you have further questions, or if there is anything that isn't clear, please talk to your adviser or contact us.

This guide must be accompanied by an Adviser Profile which outlines your adviser's skills, qualifications and the services they are authorised to provide.



Insignia™
Financial

Not independent

We are a wholly owned subsidiary of Insignia Financial Ltd (ABN 49 100 103 722) and part of the Insignia Financial Group of companies (Insignia Financial Group). The Insignia Financial Group is an issuer of financial products, some of which are included in our Approved Product List. In addition, we may receive commission on life insurance products as explained in this FSG under the heading 'How we are paid'. For these reasons, we do not refer to ourselves or our advice as independent, impartial or unbiased.

About us

Helping you make the most of life

At its heart, good financial advice is all about making the most of life – helping you to decide what you want to achieve and setting the financial strategies to help you do it. Everyone has different goals in life, but for most of us, finances play an important role in reaching them.

That's where we can help. Since 1979 advisers with RI Advice Group (formerly RetireInvest) have helped thousands of Australians to create, grow and protect their wealth.

Your adviser provides professional advice to help you achieve what you want out of life. RI Advice practices are locally owned, employing highly qualified financial advisers. Each adviser has a legal obligation and an ethical duty to act with integrity and in the best interests of their clients. Your adviser is a self-employed practice owner or employed by the practice. The Adviser Profile provided with this guide has specific information about your adviser.

Your adviser, or the practice they work for, has chosen to partner with RI Advice Group, who provides your adviser with research, training, compliance, technical and operational support. RI Advice Group is responsible for any financial service your adviser provides on its behalf.

RI Advice is a wholly owned subsidiary of Insignia Financial Ltd (Insignia Financial Group) which is listed on the Australian Securities Exchange (ASX: IFL). Our relationship with Insignia Financial allows us the opportunity to engage with the Group's shared services and support teams to provide great outcomes for our clients.

RI Advice Group Pty Ltd
ABN 23 001 774 125 | AFSL 238429

Level 3, 30 Hickson Road
Millers Point NSW 2000

Phone: 1800 738 473
Email: ripracticedevelopment@riadvice.com.au
Website: www.riadvice.com.au

Products and services we provide

Our network of advisers provide a range of financial services including investing, superannuation, retirement and insurance. Specific information about the services your adviser is authorised to provide and their qualifications are contained in the attached Adviser Profile.

Important documents you can expect to receive

When your adviser provides personal financial advice for the first time, you will generally be given a Statement of Advice (SoA). The SoA sets out your personal advice, the basis on which it is given, the cost of the advice, and information about any associations or relationships that could influence the advice.

If you require further advice at a later time, providing your circumstances have not changed significantly since your previous SoA, your adviser may be able to provide the further advice verbally or via a shorter Record of Advice (RoA). If you are given verbal advice, your adviser will document the discussion and a copy of this record can be made available to you on request. If you are given further advice and your circumstances have changed significantly since your previous SoA, you will generally be given another SoA.

To help you make an informed decision about a financial product, you will generally be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances, there is no requirement to provide a PDS (including, for example, where you already have one).

If you ask your adviser to undertake a transaction without receiving advice from that adviser, you may be given a letter confirming your instructions and disclosing any costs payable by you in relation to that transaction.

Our Approved Products List

Our Approved Products List (APL) is a list of what we consider to be sound quality, fully researched products, but doesn't include all possible products available in the market. Only products and services that have been examined by our experienced research team are placed on our APL.

When selecting products for you, your adviser is generally limited to the range of investment products and a selection of 12 insurance providers on the APL.

Your adviser will first source from the APL before providing any recommendations. They will only recommend a product or service after considering its appropriateness in relation to your individual objectives, financial situation, needs and best interests. Where your strategy requires products and services other than those on the APL to act in your best interests, the Insignia Financial research team will be consulted and we will seek to find an alternative solution.

The APL includes products issued and platforms operated by related companies including, IOOF Investment Management Limited, Questor Financial Services Limited, IOOF Investment Services Ltd, Navigator Australia Limited, Oasis Fund Management Limited, OnePath Custodians Pty Ltd, OnePath Funds Management Limited, IOOF Ltd, MLC Investments Limited, NULIS Nominees (Australia) Limited, Managed Portfolio Services Limited, Australian Ethical Investment Limited, Antares Capital Partners Limited.

These related companies will receive fees and benefits as disclosed in the relevant document if you invest with them.

Important relationships and other benefits

In addition to the related companies listed above (under the heading 'Our Approved Products List') you should also be aware of the following relationships and benefits that we may receive. Any payments noted below are not an additional cost to you and will only be made to the extent permitted by law. Any other arrangements you need to be aware of will be set out in the Adviser Profile attached to this document. Arrangements that are relevant to the advice being provided to you will also be disclosed in your written advice.

Product and service provider benefits

RI Advice Group may receive sponsorship payments from product and service providers to fund technical and professional development training for our advisers. Our practice owners or advisers may also apply for and may qualify to receive commercial terms on a range of banking products and services such as interest rates and limited recourse terms.

Distribution fees

Related companies of RI Advice Group may receive fees for acting as the distributor of financial products which your adviser may recommend. Any fee is paid by the product issuer or administrator of the product out of its own funds. Neither your adviser nor RI Advice Group receive any of these fees.

Advisory fees

Product providers may pay advisory fees to RI Advice Group or an investment management entity associated with RI Advice Group. This fee is for the provision of portfolio management advisory services where RI Advice Group model portfolios are utilised via managed accounts or separately managed accounts. In the event of this occurring, the fee is calculated as a percentage, likely to be up to 0.15% of the managed account or separately managed account portfolio balance. Your adviser will not receive any of this fee.

Referral partners

Your adviser may have referral relationships with third parties. These third parties may include accountants, mortgage brokers, general insurance brokers, solicitors, real estate agents and other third parties who specialise in a specific field. Any referral arrangements you need to be aware of and specific details of any referral payments we may receive will be set out in the 'Important relationships' section of the Adviser Profile attached to this document. Referral arrangements that are relevant to any advice being provided to you will also be disclosed in your written advice. Where you are referred to a third party (including to other financial advisers) by your adviser, neither your adviser nor RI Advice Group approve or endorse their advice and won't be liable for the provision of advice and services provided by the third party. You must assess the merits of their advice in the light of your own circumstances and objectives.

Referrals to a third party

Where you are referred to a third party (including to other financial advisers) by your adviser, your adviser does not receive any payment for that referral. We also do not approve or endorse their advice. You must assess the merits of their advice in the light of your own circumstances and objectives.

Associated businesses

Your adviser may have associations with other related businesses, such as an accountancy firm.

Other payments

We keep a full register of any benefits received by advisers of between \$100 to \$300. By law, your adviser is not permitted to receive benefits in excess of \$300 per year from a product issuer. In addition, RI Advice Group keeps a register of any other non-monetary benefits your adviser may receive in relation to education, training, technology support or software that is relevant to the provision of financial advice. If you would like a copy of either register, please ask your adviser and one will be made available to you.

How we are paid

We receive remuneration from:

- Advice and service fees paid by you (fee for service)
- Commissions from insurance providers
- Other payments and benefits as outlined above under the heading 'Important relationships and other benefits'

As the licensee, RI Advice Group collects all fees and commissions which are paid on to your adviser's practice. The Adviser Profile explains how your adviser is paid. RI Advice Group receives a licensee fee from your adviser's practice of up to \$165,000 per annum, which is in part based on remuneration paid to your adviser's practice.

Advice and service fees paid by you

Before providing personal advice, your adviser will agree the fees and payment options with you. These fees will be based on your individual circumstances, the complexity of your situation and the time it takes to prepare your personal financial advice. Fees and commissions that are relevant to the advice being provided will also be disclosed in the written advice provided to you.

The types of fees you may be asked to pay can include:

- **Statement of Advice (SoA) fee** – a fee to gather information, analyse your situation and prepare your SoA.
- **Implementation fee** – a fee to implement the recommendations contained in your SoA.
- **Review service fee** – a fee for the provision of review services if you enter into a service agreement with your adviser.

Your adviser may also charge other fees for the ad hoc provision of advice or services, including if you instruct your adviser to complete a transaction on your behalf such as buying or selling specific financial products.

If you have a complaint

If you have a complaint about financial services provided to you, your complaint can be directed to your adviser in the first instance. You can also raise your complaint at any time by contacting us at:

Email: advicecomplaints@insigniafinancial.com.au

In writing to: Insignia Financial Advice
Dispute Resolution Team
Level 3, 30 Hickson Road,
Millers Point NSW 2000

Phone: 1800 271 147

We will investigate and endeavour to resolve your complaint promptly and fairly. If your complaint has not been resolved to your satisfaction within 30 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA).

AFCA is an external dispute resolution scheme which provides fair and independent financial services complaint resolution that is free to consumers. AFCA's contact details are:

Email: info@afca.org.au

Website: www.afca.org.au

In writing to: Australian Financial
Complaints Authority
GPO Box 3, Melbourne VIC 3001

Phone: 1800 931 678

The Australian Securities and Investment Commission (ASIC) has an information line 1300 300 630 which you may use to obtain information about your rights, and to make a complaint.

For more information, please visit their website: www.asic.gov.au

Professional indemnity insurance

RI Advice Group is covered by professional indemnity insurance satisfying the requirements under the Corporations Act for compensation arrangements.

Our insurance arrangements cover claims made against us as the licensee and both our current and former authorised representatives.

Our privacy policy

We are committed to maintaining the privacy and security of your personal information.

Any personal information collected by RI Advice Group will be handled in accordance with its Privacy Policy (<https://riadvice.com.au/privacy-policy>)

The way in which your adviser handles your personal information is outlined in their Adviser Profile.

Want more information?

If you have any questions about the information in this guide or about our services, talk to your adviser or contact RI Advice Group directly.

Call 1800 738 473

Email ripracticedevelopment@riadvice.com.au

Website www.riadvice.com.au



Retirement Advice Specialists

RI Advice Group Pty Ltd | ABN 23 001 774 125 AFSL 238429 | Level 3, 30 Hickson Road, Millers Point NSW 2000

RI Advice has authorised the distribution of the FSG by its authorised representatives. RI Advice Group acts on your behalf when providing services to you or when financial services are provided to you on its behalf.

30 January 2023 | RI/FSG/PartA

Part 2 Adviser Profile

Brett Martin

This adviser profile forms an essential part of the Financial Service Guide (FSG). The FSG is not complete without it.

Introducing your financial adviser

Brett Martin is an Authorised Representative of RI Advice Group Pty Ltd AFSL 238429. Brett is a director of RI Northern NSW Pty Ltd which is a Corporate Authorised Representative of RI Advice Group Pty Ltd.

Authorised Representative Number: 311098
Corporate Authorised Representative Number: 1287587
Adviser profile issue date: 1 October 2022

About Brett

I have worked in financial services for over 25 years and been a financial adviser since 2006 and the practice principal here at Harbour Wealth Management since 2015.

I feel very fortunate to be supported by a great team of individuals who work in our practice that give clients the confidence and trust to know that their best interests are being looked after.

Qualifications and memberships

- Certified Financial Planner®
- Bachelor of Business
- Graduate Diploma in Financial Planning
- Graduate Diploma in Applied Finance and Investment
- Member of the Financial Planning Association of Australia (FPA)

Financial products and services

I am authorised to provide you with general and personal financial advice on the following class and types of products.

- Deposit and payment products
- Life investment or life risk products
- Interests in managed investment schemes, including investor directed portfolio services (IDPS)
- Retirement savings accounts
- Securities
- Superannuation

Services offered

- Personal Insurance
- Superannuation
- Budget and cashflow management
- Debt management
- Investments, including savings plans
- Retirement planning
- Centrelink/DVA
- Estate planning
- Ownership and structures (eg discretionary and family trusts)
- Portfolio review
- Ongoing advisory services
- Referrals to specialists (eg accountants, solicitors)
- Self Managed Superannuation
- ASX listed investments managed under a model portfolio
- Approved ASX listed investments within the ASX 200
- Gearing

How I am paid

As the licensee, RI Advice collects all advice fees and commissions. RI Advice then pays the fees and commissions to my Practice as detailed in the FSG under the heading 'How we are paid'. My Practice pays me out of these fees and commissions based on a number of factors such as:

- **Salary** – based on my experience and qualifications.
- **Bonus** – I may be eligible to receive a bonus, based on a combination of revenue and meeting pre-determined annual performance-based criteria.
- **Profits** – I may be eligible to receive a percentage of profits from the Practice.
- **Commissions** – as outlined in the FSG under 'How we are paid', the Practice may receive commissions from a product provider when implementing certain product/s for you.

Client fee and payment options

Before providing advice, we will agree the fees and payment options with you. The fee you pay will depend on the complexity of your circumstances and the services you require. Your options to pay for our services can include fee for service, commission, or a combination of both.

Fee for service: Fee for service is based on the service we provide. This fee can be determined by:

- An hourly rate.
- A fixed dollar amount.
- A percentage of funds invested (excluding borrowed funds).
- A combination of these methods.

We can invoice you directly for our fee for service. Alternatively, some products allow an adviser service fee to be deducted from the balance of your investment.

Commissions: Some product providers pay commissions to RI Advice. The amount of commissions received will depend upon the type of product and the premium paid.

Important relationships

In addition to the arrangements already disclosed in the FSG under 'Important relationships and other payments', RI Northern NSW Pty Ltd also has the following arrangements:

Referrals from a third party

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to a third party

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Privacy Notification

Your personal information will be handled in accordance with our privacy policy, which is located on our website. We will generally collect personal information directly from you. We may collect personal information about you from a third party if we believe you have authorised that third party to provide the information to us.

The main reason we collect, use and/or disclose your personal information, is to provide you with the services that you request. In addition, as a financial service provider, we are obligated to verify your identity and the source of any funds.

We provide financial services under the Australian Financial Services License of RI Advice Group Pty Ltd. RI Advice Group Pty Ltd monitors our compliance with the law and provides us with a range of support services, including the financial planning software we use. As a consequence, RI Advice Group Pty Ltd has access to your personal information and may use that information to facilitate the provision of financial services to you and to ensure we are complying with our obligations.

We may also disclose your information to external parties such as your accountant, banks, insurers, and product providers.

In order to keep our costs competitive, our Practice uses specialist business support resources that are located in the following countries: Sri Lanka, The Philippines.

The organisation/s we have contracted to support our business have confirmed to us they will adhere to the Australian Privacy Principles when dealing with your personal information. They will not contact you or share your information with any other party unless they have your express approval.

Please refer to our Privacy Policy for more information about how we will handle your personal information, including how to access or correct your personal information and how to make a privacy related complaint.

My contact details

A: 6 Earl Street,
Coffs Harbour NSW 2450
P: 02 6651 2000
E: brett.martin@harbourwealth.com.au
W: www.harbourwealthmanagement.com.au

Part 2 Adviser Profile

Troy Young

This adviser profile forms an essential part of the Financial Service Guide (FSG). The FSG is not complete without it.

Introducing your financial adviser

Troy Young is an Authorised Representative of RI Advice Group Pty Ltd AFSL 238429. Troy is an employee of RI Northern NSW Pty Ltd which is a Corporate Authorised Representative of RI Advice Group Pty Ltd.

Authorised Representative Number: 1295198
Corporate Authorised Representative Number: 1287587
Adviser profile issue date: 1 October 2022

About Troy

At Harbour Wealth Management we specialise in providing holistic retirement planning advice, empowering our clients to have an enjoyable and fulfilling post-work life.

I have been part of the Harbour Wealth Management team since 2015. I hold a Graduate Diploma in Financial Planning from Kaplan Professional and I am currently in the process of completing a Master's in Financial Planning.

Outside of work, I am an avid reader and passionate car enthusiast. I also sit on the committee for the Mid North Coast branch of the Disabled Surfers Association (DSA).

Qualifications and memberships

- Graduate Diploma of Financial Planning
- Accredited Listed Product Adviser (ASX ALPA)
- Association of Financial Advisers (AFA)
- Responsible Investment Association Australasia (RIAA)

Financial products and services

I am authorised to provide you with general and personal financial advice on the following class and types of products.

- Deposit and payment products
- Life investment or life risk products
- Interests in managed investment schemes, including investor directed portfolio services (IDPS)
- Retirement savings accounts
- Securities
- Superannuation

Services offered

- Personal Insurance
- Superannuation
- Budget and cashflow management
- Debt management
- Investments, including savings plans
- Retirement planning
- Centrelink/DVA
- Estate planning
- Ownership and structures (eg discretionary and family trusts)
- Portfolio review
- Ongoing advisory services
- Referrals to specialists (eg accountants, solicitors)
- Self Managed Superannuation Funds
- ASX listed investments managed under a model portfolio
- Approved ASX listed investments within the ASX 200
- Aged Care

How I am paid

As the licensee, RI Advice Group Pty Ltd collects all advice fees and commissions. RI Advice Group Pty Ltd then pays the fees and commissions to my Practice as detailed in the FSG under the heading 'How we are paid'. My Practice pays me out of these fees and commissions based on a number of factors such as:

- **Salary** – based on my experience and qualifications.
- **Bonus** – I may be eligible to receive a bonus, based on a combination of revenue and meeting pre-determined annual performance-based criteria.
- **Profits** – I may be eligible to receive a percentage of profits from the Practice.
- **Commissions** – as outlined in the FSG under 'How we are paid', the Practice may receive commissions from a product provider when implementing certain product/s for you.

Client fee and payment options

Before providing advice, we will agree the fees and payment options with you. The fee you pay will depend on the complexity of your circumstances and the services you require. Your options to pay for our services can include fee for service, commission, or a combination of both.

Fee for service: Fee for service is based on the service we provide. This fee can be determined by:

- An hourly rate.
- A fixed dollar amount.
- A percentage of funds invested (excluding borrowed funds).
- A combination of these methods.

We can invoice you directly for our fee for service. Alternatively, some products allow an adviser service fee to be deducted from the balance of your investment.

Commissions: Some product providers pay commissions to RI Advice Group Pty Ltd. The amount of commissions received will depend upon the type of product and the premium paid.

Important relationships

In addition to the arrangements already disclosed in the FSG under 'Important relationships and other payments', RI Northern NSW Pty Ltd also has the following arrangements:

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At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Privacy Notification

Your personal information will be handled in accordance with our privacy policy, which is located on our website. We will generally collect personal information directly from you. We may collect personal information about you from a third party if we believe you have authorised that third party to provide the information to us.

The main reason we collect, use and/or disclose your personal information, is to provide you with the services that you request. In addition, as a financial service provider, we are obligated to verify your identity and the source of any funds.

We provide financial services under the Australian Financial Services License of RI Advice Group Pty Ltd. RI Advice Group Pty Ltd monitors our compliance with the law and provides us with a range of support services, including the financial planning software we use. As a consequence, RI Advice Group Pty Ltd has access to your personal information and may use that information to facilitate the provision of financial services to you and to ensure we are complying with our obligations.

We may also disclose your information to external parties such as your accountant, banks, insurers, and product providers.

In order to keep our costs competitive, our Practice uses specialist business support resources that are located in the following countries: Sri Lanka, The Philippines.

The organisation/s we have contracted to support our business have confirmed to us they will adhere to the Australian Privacy Principles when dealing with your personal information. They will not contact you or share your information with any other party unless they have your express approval.

Please refer to our Privacy Policy for more information about how we will handle your personal information, including how to access or correct your personal information and how to make a privacy related complaint.

My contact details

A: 6 Earl Street,
Coffs Harbour NSW 2450
P: 02 6651 2000
E: troy.young@harbourwealth.com.au
W: www.harbourwealthmanagement.com.au

Privacy Policy

This privacy policy outlines how RI Northern NSW Pty Ltd, trading as Harbour Wealth Management, ('we', 'us' or 'our') manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

The privacy of your personal information is important to us. We are required to comply with the Australian Privacy Principles. We will comply with the Australian Privacy Principles as well as other applicable laws affecting your personal information.

Collecting Your Personal Information

Your personal information will be collected and held by us, as a corporate authorised representative of RI Advice Group, an Australian Financial Services Licensee (**Licensee**), for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- protect our business and other clients from fraudulent or unlawful activity;
- to comply with relevant laws, regulations, and other legal obligations;
- to help us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested; and
- for any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers. You can do this by contacting us on 026651 2000 or via email at info@harbourwealth.com.au. We will process your request as soon as practicable.

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant, or others whom we believe you have authorized to provide information to us.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

How Your Personal Information is Held

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices, and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. The types of service providers and other third parties that may be provided with your personal information are:

- our Licensee, who provides us with our financial planning software and compliance support services;
- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- a superannuation trustee or other product provider who you have authorized to deduct advice-related costs from your superannuation or investment fund who has requested to review a copy of your Statement of Advice to satisfy their legal obligations;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorize the use or disclosure such as when it is required by or authorized under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Organisations outside Australia

In order to provide you with our services, we may need to share your information with organisations outside Australia (for example paraplanning and administration support providers) – these countries include:

- The Philippines
- Sri Lanka

We may store your information in the 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. Overseas organisations may be required to disclose the information we share with them under a foreign law.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

Accessing your Personal Information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access we will provide you with the reasons for this decision. To request access please contact us (see "Contacting Us and Privacy Issues" below).

Correcting Your Personal Information

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and let us know what information is incorrect.

If we agree that the personal information requires correcting we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not doing so.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us using the details below.

- Brett Martin, Financial Adviser and Practice Principal, on 026651 2000

We are committed to working with you to resolve a complaint involving your personal information. However, if you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

Office of the Australian Information Commissioner

- www.oaic.gov.au/privacy
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au

Or

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

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.