

SGN Privacy Policy

At a glance

Responsibility, review and breaches of this policy

SGN and its practices are each regulated entities under the Privacy Act 1988 (Privacy Act). That means SGN and each of its practices is responsible for meeting its own obligations under the Privacy Act. As licensee, SGN requires each practice to adopt for itself the CAR Privacy Policy as set out in Part B of this policy. SGN has numerous financial services legal obligations which overlap with its privacy obligations.

This policy is set out in three parts:

- Part A. This part sets out the scope.
- Part B. This part includes the Privacy Policy that each practice (CAR) is to adopt as their own.
- Part C. This part details the licensee's discrete, licensee level Privacy Policy.

The [insert the responsible person as identified in the risk register] is the 'Responsible Person' who oversees this policy. The Compliance Assurance Committee (CAC) is responsible for signing off on this policy and for periodically reviewing it in accordance with our Compliance Diary.

If a breach of the policy occurs, we follow the procedure set out in our Breach (Reportable Situation) and Events Reporting Policy.

Introduction and scope

The Privacy Act regulates the handling of personal information including collection, use, storage, disclosure, and access to and correction of that information. Australian businesses, including AFSL holders, must comply with the requirements set out in the 13 Australian Privacy Principles (APPs) under the Privacy Act.

The Privacy Act exemptions for small businesses do not apply to us as we collect personal and sensitive information in the course of providing services, therefore we are required to develop and maintain practices and security measures to comply with the APPs.

What personal information we collect and why

SGN and its practices (in this Part A, 'we' collectively refers to SGN and each of its practices) only collect personal information that is required to provide financial services and satisfy our legal obligations and/or for use in secondary related purposes unless client consent is obtained to use it for other purposes. Typically, we will collect this information directly from clients, using a combination of meetings and questionnaires, or via our

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website where a client provides personal information on a submitted form. We may receive information from third parties such as Accountants or other professionals, where a client has authorised this. Practices may be required to make personal information available to their licensee, SGN, in order for SGN to perform its obligations as licensee.

Government issued personal identification reference numbers (such as Tax File, Medicare or Centrelink numbers) must never be used as client identifiers.

The type of information we collect typically includes:

- Demographic information such as full name, address, date of birth, nationality, marital status, gender and dependent details,
- Collection of identification and verification of a client's identity to ensure compliance with AML/CTF laws,
- Financial information,
- Tax file number (TFN),
- Sensitive information such as Personal health and medical information (to assess eligibility for personal risk insurances, and
- Information about a person's financial needs, goals and objectives.

When collecting a Tax File Number, an explicit consent to collect, store and use must be provided by the client in accordance with TFN legislation. This record must be retained on the client file.

How we store information

We store all personal information in electronic format in facilities we own and/or in secure cloud-based storage. Hard copy paper files are stored securely with access restricted only to those staff who require access to the information.

Under the Privacy Act, we are required to take reasonable steps to protect personal information we hold from misuse, interference and loss, as well as unauthorised access, modification or disclosure. This can include having technical and organisational measures in place to protect personal information we hold.

Examples of technical measures to protect personal information include: physical measures, software and hardware – e.g. through securing access to premises, encrypting data, anti-virus software and strong passwords.

Examples of organisational measures to protect personal information include processes we have put in place such as training employees on data protection, and developing standard operating procedures and policies for securing personal information.

We maintain high data security standards to reduce the risk of unauthorised access to confidential or sensitive information.

Should a data breach occur, the data breach assessment and reporting procedure below must be followed, which includes an obligation to notify SGN (if the breach happens at a practice level), clients, and report to the Office of the Australian Information Commissioner in certain circumstances.

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Any original client documents must be returned after scanning.

We are required to retain most records for at least 7 years, or 7 years after the cessation of services being provided to a client. The Privacy Act also requires us to destroy or de-identify personal information when it is no longer required.

How we use and disclose information

We only use and disclose personal information collected from or about our clients for the purpose of providing financial services and/or secondary related purposes, meeting our legal and regulatory obligations, and to seek external consulting or legal advice about our affairs. We will share confidential and sensitive client information with any or all of the following parties as required, to deliver or facilitate a financial service or related service, or where required to by law:

- Issuers of financial products,
- Life risk insurers,
- Outsourced service providers such as paraplanning, administration support,
- Associated professionals such as auditors, accountants, lawyers where either a referral has been sought by the client, or where SGN Financial has engaged quality assurance, legal advice or an audit function.

In some instances, these providers may be based overseas. Where a third-party outsourced provider is located overseas, we conduct due diligence on their adherence to the requirements set out in the Australian Privacy Principles prior to engagement and monitor their performance throughout their engagement.

Providing individuals with access to, or the ability to correct their personal or sensitive information

The requirements of the advice process ensure that client information is reviewed for currency and accuracy at each client review.

If a client notifies us that we have inaccurate information, or of changes to their circumstances, our Customer Relationship Management (CRM) software and client files will be updated. Where such information is provided unsolicited by email or phone, we will take steps to verify the identity of the client prior to making any updates. The Privacy Act permits individuals to seek access to the personal information a business holds about them. Such requests should be confirmed in writing and directed to The Compliance Manager. Typically, we will only provide copies of the following information if such a request is received:

- Information the client has given us, including fact finds signed by the client, emails or other correspondence, financial information and statements.
- Advice documents provided to the client and a signed authority to proceed if applicable.
- Correspondence sent to the client including emails and letters.

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Unless approved by the SGN compliance team, staff must **not** provide any of the following to clients:

- File notes.
- Intra-office correspondence such as tasks, threads or emails between staff relating the provision of services to the client.
- Correspondence with third parties such as financial product providers relating to implementation of advice.

Explaining our privacy arrangements to clients

Clients should be directed to the privacy statement on SGN's website or the CAR's website, if they have any questions about how we collect, store, use or disclose their information. The privacy statement is referenced in our Financial Services Guide, welcome email and Financial Planning Questionnaire.

Complaints about privacy

All complaints about our collection, handling or use of personal information should be directed to the SGN compliance team.

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Our Privacy Arrangements

Who we are

We are Right Advice Wealth Management Pty Ltd (ABN 15 625 930 163), corporate authorised representatives of SGN Financial Pty Ltd, Australian Financial Services Licence number 490523.

Ground Floor, Unit 5
6 Waterfront Place
Robina QLD 4226

What is the purpose of this policy?

This policy provides you with information about:

- The personal information that Right Advice Wealth Management Pty Ltd collects about you
- How we handle your information, including how we use, disclose and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information.

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.

What information do we collect, and why?

We only collect personal information that is required for us to provide financial services or secondary related services to you and to satisfy our own legal obligations. Typically, we will collect this information directly from you, using a combination of meetings and questionnaires, or via our website where you send a request that includes 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.

We do not utilise any standard personal identification reference numbers (such as Tax File, Medicare or Centrelink numbers) as identifiers.

The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original or certified copy of your drivers' licence, passport or other primary identification,

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- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances, and
- Information about your financial needs, goals and objectives.

It is important that you provide us with complete and accurate information, as we use this to develop appropriate strategies and research suitable financial products that suit you. While we will take reasonable steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you give us incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

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 protocols.

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 will your information be stored?

We store all personal information in electronic format in facilities we own and/or in secure cloud-based storage. Hard copy paper files are stored securely with access restricted only to those staff who require your information to provide our financial services.

We maintain high data security standards to reduce the risk of unauthorised access to your information. However, should a data breach occur where we reasonably believe your personal information may have been compromised, we will contact you to notify you of the information that was compromised. In certain data breach situations, we will also be required to report to the Office of the Australian Information Commissioner.

Any original documents given to us will be returned to you after we have scanned them. We are required to retain most records for at least 7 years, or 7 years after the cessation of services being provided to a client. The Privacy Act also requires us to destroy or de-identify personal information when it is no longer required.

How will we use and disclose your information?

We only use and disclose your personal information for the purpose of providing you with financial services and/or for secondary related purposes, to carry on our financial services business compliantly and to seek legal advice about our affairs.

The information we collect will be used to develop an appropriate financial strategy to achieve your short, medium and long-term goals, and determine which financial products (if any) should be acquired or replaced.

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Our support staff and outsourced contractors will have access to this information as required to assist with the development of your financial strategy.

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 may also use secure AI software with human oversight to manage some compliance tasks. We do not load personal information into publicly accessible GPTs or large language models.

Where we accept your instruction to acquire a financial product, we will disclose your relevant personal information to the financial product issuer or nominee.

We may also disclose your information to other third parties where required to deliver our financial services and/or secondary related services to you, or as required by law. These parties include issuers of financial products, custodians, life risk insurers, outsourced service providers such as paraplanning, administration support, auditors, accountants, lawyers, or quality assurance providers. In some instances, these providers may be based overseas. We currently have outsourcing arrangements that store and/or access data in the Philippines and Sri Lanka.

Where your information is shared with a third party outside Australia, we will take reasonable steps to satisfy ourselves the third party has arrangements to comply with the requirements of the Australian Privacy Principles. This includes ensuring the third party agrees to meet the necessary privacy standards in their agreement with us.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

How can you access or correct the information we hold about you?

We will take reasonable steps to ensure that the personal information we hold about you is accurate, up to date, relevant and complete, including when it is used or disclosed. If you identify inaccuracies with the information we hold, or there are changes to your circumstances, you can contact us to correct or update the information we hold. If we do not agree with your corrections, we may refuse to update the personal information, in which case we will provide you with a written explanation as to why.

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The Privacy Act allows you to seek access to your personal information. To request access, please contact our Privacy Officer:

Matt Lewis (Director and Financial Planner)

PO Box 7174, Mt Crosby, QLD 4306

Tel: 0420 677 977

Email: matt.lewis@rawm.com.au

There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

How can you complaint about our handling of your information?

If you have a complaint about how we have collected, used or stored your personal information, you can direct your complaint to our Complaints Manager at:

Matt Lewis (Director and Financial Planner)

PO Box 7174, Mt Crosby, QLD 4306

Tel: 0420 677 977

Email: matt.lewis@rawm.com.au

Alternatively, you may contact the Office of the Australian Information Commissioner by submitting a complaint through their [online form](#), or by contacting them at:

Privacy Complaints

GPO Box 5288

Sydney NSW 2001

Phone: 1300 363 992

Fax: 02 6123 5145.

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Who we are

We are SGN Financial Pty Ltd ('SGN', 'we'), Australian Financial Services Licence number 490523.
Suite 1303, Lakeside 2 'Bermuda Point'
1 Lake Orr Drive Varsity Lakes
QLD 4227

What is the purpose of this policy?

This policy provides you with information about:

- The personal information that SGN collects about you
- How we handle your information, including how we use, disclose and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information.

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.

What information do we collect, and why?

We only collect personal information that is required for us to provide financial services and/or secondary related services to you and to satisfy our own legal obligations as the holder of an Australian Financial Services Licence. Typically, we will collect this information directly from you, using a combination of meetings and questionnaires, via our website where you send a request that includes personal information, or via the practices that operate under our financial services licence or the CRM software they use. We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

We do not utilise any standard personal identification reference numbers (such as Tax File, Medicare or Centrelink numbers) as identifiers.

The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original or certified copy of your drivers' licence, passport or other primary identification,

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- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances, and
- Information about your financial needs, goals and objectives.

It is important that you provide us and our practices with complete and accurate information, as this is used to develop appropriate strategies and research suitable financial products that suit you. While we will take reasonable steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you provide incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

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How will your information be stored?

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We maintain high data security standards to reduce the risk of unauthorised access to your information. However, should a data breach occur where we reasonably believe your personal information may have been compromised, we will contact you to notify you of the information that was compromised. In certain data breach situations, we will also be required to report to the Office of the Australian Information Commissioner.

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How will we use and disclose your information?

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The information we collect will be used to develop an appropriate financial strategy to achieve your short, medium and long-term goals, and determine which financial products (if any) should be acquired or replaced. Our support staff and outsourced contractors will have access to this information as required to assist with the development of your financial strategy. 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 may also use secure AI software with human oversight to manage some compliance tasks. We do not load personal information into publicly accessible GPTs or large language models.

Where we accept your instruction to acquire a financial product, we will disclose your relevant personal information to the financial product issuer or nominee.

We may also disclose your information to other third parties where required to deliver our financial services and/or secondary related services to you, or as required by law. These parties include issuers of financial products, life risk insurers, outsourced service providers such as paraplanning, administration support, auditors, accountants, lawyers, or quality assurance. In some instances, these providers may be based overseas. We currently have outsourcing arrangements that store and/or access data in the Philippines and Sri Lanka.

Where your information is shared with a third party outside Australia, we will take reasonable steps to satisfy ourselves the third party has arrangements to comply with the requirements of the Australian Privacy Principles. This includes ensuring the third party agrees to meet the necessary privacy standards in their agreement with us.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

How can you access or correct the information we hold about you?

We will take reasonable steps to ensure that the personal information we hold about you is accurate, up to date, relevant and complete, including when it is used or disclosed. If you identify inaccuracies with the information we hold, or there are changes to your circumstances, you can contact us to correct or update the information we hold. If we do not agree with your corrections, we may refuse to update the personal information, in which case we will provide you with a written explanation as to why.

The Privacy Act allows you to seek access to your personal information. To request access, please contact Privacy Officer, David Murray, CEO SGN Financial Pty Ltd at PO Box 9222, Brighton VIC 3186, Tel 0409 717 707, email compliance@sgnf.com.au. There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

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How can you complain about our handling of your information?

If you have a complaint about how we have collected, used or stored your personal information, you can direct your complaint to:

David Murray, CEO SGN Financial Pty Ltd –
PO Box 9222, Brighton VIC 3186,
Tel: 0409 717 707,
Email: compliance@sgnf.com.au.

Alternatively, you may contact the Office of the Australian Information Commissioner by submitting a complaint through their [online form](#), or by contacting them at:

Privacy Complaints
GPO Box 5288
Sydney NSW 2001

Phone: 1300 363 992
Fax: 02 6123 5145.

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