



Aspirations Wealth Group
Build and Protect your Wealth

Privacy Policy

Version 1.0

Dated 31/03/2018

Aspirations Wealth Group is authorised to provide financial advice by Aspirations Private Wealth.

Aspirations is boutique firm of private wealth advisers whose mission is to help successful people live a more inspired life by delivering them the clarity and financial freedom they need. This document outlines Aspirations Private Wealth's policy on handling the personal information that we collect about individuals. We are committed to protecting your privacy. When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with. At all times we will comply with the terms of this when handling your personal information. This policy answers the following questions about privacy. Companies this policy relates to are:

- Aspirations Private Wealth Pty Ltd (APW), ABN 57 622 182 076. (AFSL No 503889)
- Aspirations Wealth Group Pty Ltd (AWG), ABN 17 066 549 906.



How can you contact us about privacy?

You can call us on (02) 9580 7966, send an email to support@aspirationswealth.com.au or write to us at Aspirations Customer Service, PO Box 210, Miranda NSW 1490.

Why do we need your personal information?

Understanding and meeting our client's financial needs over the course of their lifetime is a central part of our business. We do this by providing financial products and services under various brands that are offered by entities within the Aspirations group. To do this effectively, we need to collect certain personal information. In this policy, personal information is any information that could identify you or be used to establish your identity. We collect, hold, use and disclose client's personal information so we can establish, manage and administer the professional services provided by us, and comply with legal and regulatory obligations. We may also use and disclose your information for purposes related to those mentioned above, such as:

- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Enhancing our service options
- Internal operations, such as record keeping, data analytics, auditing or training.

Will my personal information be used for direct marketing?

We use and disclose your personal information to keep you informed about the range of financial products and services offered by us. You can opt out of receiving direct marketing information from us at any time.

What happens if I/we do not provide information that has been requested?

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud. Where you are seeking financial advice, it may also affect our ability to properly analyse your personal circumstances.

What types of personal information do we collect?

We may ask for a range of personal information to assist us in providing you with relevant financial products and services. The information we request could include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, health information, employment details, and citizenship status.

Will we collect sensitive information?

Sometimes we need to collect and use sensitive personal information such as health information when we consider applications for some insurance and banking products. If we need to obtain, use and disclose this type of information, we will ask for your consent, except where disclosure is permitted by law.



How do we collect personal information?

Most of the personal information we collect will be directly from you. We gather this information either through application forms or other forms that you complete and submit to us (in writing and digitally).

Can you remain anonymous when dealing with us?

If you wish to remain anonymous when dealing with us, we may be able to provide you with limited information or services. However in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous.

How do we protect your personal information?

Whether your personal information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet or other methods, we take steps to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats. We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our team and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals. When we don't need your personal information anymore we will delete, destroy or de-identify it.

Who do we share personal information with?

From time to time we may share your personal information with other entities both within and outside of the Aspirations group. The entities that we might share your personal information with vary according to the product or service involved, but could include:

- financial advisers, brokers and other parties authorised or accredited by Aspirations
- service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance or research services, some of whom may contact you on our behalf
- courts, tribunals and other dispute resolution bodies in the course of a dispute
- credit reporting or reference agencies or insurance investigators
- employers contributing to or otherwise participating in our superannuation or insurance plans
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service)

How do we update your personal information?

We will update your personal information if you contact us. In most cases you can update your personal information over the phone. We may update your personal information if we believe the personal information we hold is incomplete or out of date, we could seek to correct or complete our records by gathering data from other sources such as public records and other organisations.



How do you find out about your personal information we hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us. We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time. There are some situations where we are allowed to refuse or limit your access to information, for example when the information is commercially sensitive. If that happens, we'll write to you and let you know why. There is no charge for making a request to access your personal information. However in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us on (02) 9580 7966 or send an email to support@aspirationswealth.com.au. We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. In most cases, we'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter. If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can contact an external body:

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner 1300 363 992 or find them online at oaic.gov.au
- If your complaint is about the products and services we provide you can contact Financial Ombudsman Service on 1800 367 287 or find them online at fos.org.au

Links to third party websites

Our website (www.aspirationswealth.com.au) may have links to external third party websites which are there for your use and benefit. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to Aspirations privacy standards and procedures.

Website analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from our website, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website. This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites. You cannot be identified personally from this information and no personal information is stored about you.

About this policy

We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website. We encourage you to check our website from time to time to view our current policy, or contact us for a printed copy. This policy incorporates the relevant provisions of the Privacy Act and the Australian Privacy Principles.