

PRIVACY POLICY

Version 24.1 – October 2024

About this privacy policy

The *Privacy Act 1988 (Cth)* (the **Privacy Act**) requires entities bound by the Australian Privacy Principles (**APPs**) to have a privacy policy (**policy**).

This policy sets out how Richmond Wealth Pty Ltd (A.C.N. 600 426 391) (**Richmond**) collects, uses, discloses, stores and accesses the personal information that you give us. It also deals with how you can make a complaint about a breach of this policy, how you can access the personal information we store about you and how to have that information corrected.

This policy applies to Richmond, its related entities and representatives, and it may be updated from time to time. The latest policy will always be available on our website, and it is effective from the date displayed above.

We are committed to protecting your privacy.

What information do we collect?

We collect your personal information directly from you, but on occasion we may also collect information about you from your authorised representatives and other people and organisations.

We collect personal information when you engage Richmond to provide a service to you, and to establish or administer an account for you when providing services.

The types of information we collect can include (but is not limited to):

- your full name, contact details including address, email, telephone and date of birth
- copies of driver's license and/or passport and/or Medicare card for the purpose of verifying your identity and to ensure compliance with Anti-Money Laundering and Counter-Terrorism Financing Act (AML-CTF)
- Centrelink details
- Tax File Number and bank account details for the purpose of managing your accounts
- details of your employment, income, assets and financial liabilities
- details about your credit information
- information about your personal circumstances
- copies of any relevant trust deeds, partnership agreements which may be needed to comply with AML-CTF obligations
- any other information Richmond considers necessary in carrying out our services to you

How do we use and share the information we collect?

We use your information to enable us to deliver our services to you. This includes using your information to help us:

- determine which services are relevant to you, and provide you with these services
- manage ongoing service requirements and our client relationship with you
- manage our operations
- improve our business
- comply with our legal obligations



If there is any correspondence or information you no longer wish to receive from us, you can contact us at any time to let us know and we will remove you from any such mailing/emailing lists we may have.

In the provision of our services or an auxiliary service, we may disclose your information to third parties and other organisations. This may include organisations that provide accounting, legal, credit, transactional banking, investment, investment administration, superannuation, or insurance services. We may also need to provide your information to contractors who supply services to us or to other organisations or companies in the event of a corporate sale, merger, reorganisation, dissolution, or similar event.

There may also be circumstances where we are required by law or regulation to disclose information that you have provided to us to government bodies or regulatory authorities.

What if you don't provide information to us?

If you do not provide us with some or all the information that we ask for, we may not be able to accurately assess your situation and provide relevant and accurate financial advice and services.

How do we store and protect your information?

We store information collected from you in different ways, including in paper and electronic form. The security of your personal information is important to us, and we take reasonable steps to protect it from misuse, loss, unauthorised access, modification, or disclosure.

Some of the ways we ensure that your information is safe are:

- by imposing confidentiality requirements on our employees and contractors
- having strict security measures to access our systems
- having secured access control for our building and premises (locks and security systems)
- electronic security systems such as Firewalls, MFA and data encryption on our devices

While we are committed to safeguarding your personal information and maintaining data security, it should be noted that given the vulnerability of internet security, no data transmission over the internet can be guaranteed to be entirely secure.

We aim to keep personal information only for as long as we need it or to comply with any legal or ethical reporting or document retention requirements. When we no longer need the personal information, we take reasonable steps to destroy it.

Sharing your information overseas

We may need to share some of your information with organisations outside of Australia that support us in providing services to you. This could include a Vietnamese based administration and paraplanning support services business.

We store your information in "the Cloud" or other types of networked or electronic storage. As electronic storage 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 will be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

If we need to send or share your information overseas, we will use reasonable endeavours to make sure there are appropriate privacy, data handling and security arrangements in place to protect your information.

Overseas organisations may be required to disclosure information we share with them under law or regulation in their relevant countries, in which case will be beyond our scope of control and responsibility for that disclosure.



How do you access and correct your personal information?

You can contact us and ask to view your information. We will need your written request stating you wish to view your information, and we will then confirm your identity before we disclose to you any personal information we hold about you.

If you think your information is not correct or needs updating, let us know immediately. We will correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete. If we do not think the information needs correcting, we will let you know in writing why.

We do not charge a fee for processing a request for accessing your personal information, or for correcting or updating your personal information.

In some cases, we may refuse access or only give you some access to certain information. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

Complaints

If you have any concerns about how we have handled your personal information, you can call us on (08) 6323 3131 or email your complaint to admin@richmondwealth.com.au.

We will consider any privacy related complaints through our internal complaints' resolution process, and we will respond to you within 30 days of us receiving the complaint.

If you're not satisfied with our response after you've been through our internal complaints process, you can lodge a dispute through the Australian Financial Complaints Authority (AFCA), our external dispute resolution provider.

AFCA provides consumers and small businesses with fair, free and independent dispute resolution for financial complaints.

Australian Financial Complaints Authority (AFCA)

Visit: www.afca.org.au Email: info@afca.org.au Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Notifiable data breaches

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

As a regulated entity, Richmond is required to comply with the Notifiable Data Breaches scheme under the Privacy Act 1988. The scheme requires us to notify affected individuals and OAIC (Office of the Australian Information Commissioner) when a data breach involving personal information is likely to result in serious harm.

You can contact the Office of the Australian Information Commissioner if your complaint is about your privacy or how we handled your personal information.

Office of the Australian Information Commissioner (OAIC)

Visit: oaic.gov.au Email: enquiries@oaic.gov.au Phone: 1300 363 992

Mail: GPO Box 5288, Sydney NSW 2001