

This Privacy Policy applies to PPF Financial and related entities (also referred to as 'PPFG', 'we', 'us' or 'our' within this policy). We are required under the *Privacy Act 1988* (Cth) (**Privacy Act**) to have a clearly expressed and up-to-date privacy policy with information about how we collect, use and manage your personal information.

At PPF Financial we understand that your privacy is important to you. We are committed to ensuring that the personal information you provide to us is held within a secure and confidential environment. This policy covers:

- What Personal Information we require from you
- Failure to provide Personal Information
- Use and disclosure of your Personal Information
- Security of the information you provide
- Access to your Personal Information
- How long we keep your Personal Information
- How to amend your Personal Information
- Complaints resolution
- Our contact details
- Changes to this Privacy Policy

## What Personal Information We Require From You

As a financial services business we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you or information about you (**Personal Information**). Personal information may include "sensitive information". Sensitive information is any information, or an opinion concerning about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices or criminal record. It also includes health or genetic information, biometric information and biometric templates.

Our ability to provide you with financial services or to employ you as part of our team, is dependent on us obtaining certain Personal Information about you which may include:

- Your name, address & contact details
- Employment details and employment history
- Details of your financial circumstances, needs and objectives
- Details of your investment preference and risk tolerance
- Tax file numbers
- Bank account details
- Special dietary needs (if we are likely to serve food to you at an event we host)
- Employment application information such as employment history, qualifications, experience, criminal history, sanctions and personal insolvency checks.

In certain situations, the Personal Information we collect may (where appropriate and where it is permitted by law) include sensitive information. For example, to comply with anti-money laundering laws we may collect information about an individual's political connections and/or whether they have a criminal record or when we consider an application for employment, we may conduct a bankruptcy check. We will always let you know what information we need to collect and the reasons for doing so, if asked.

Wherever possible, we will collect all information directly from you, which will generally come from what you provide us when you apply for or utilize our products or services. We may also collect personal information about you from

third parties (for example, identity verification service providers, publicly or commercially available sources or third parties you have authorised us to contact) for the purpose of complying with legislative obligations, such as anti-money laundering laws. Once we obtain your personal information we will take reasonable steps to keep it accurate, complete and up to date.

### **Failure to Provide Personal Information**

We are required under Australian laws to collect Personal Information and at times sensitive information about you in order to provide our services, these include:

- Privacy Act;
- Corporations Act 2001 (Cth) ;
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) ; and
- Income Tax Assessment Act 1936 (Cth) and Income Tax Assessment Act 1997 (Cth),

as well as the professional conduct rules of the various professional bodies<sup>1</sup> to which we retain membership. If you elect not to provide us with the personal information we request, we may elect to terminate our service contract with you if we believe we are unable to provide you with a complete service or that we are unable to meet our legal and regulatory requirements.

### **Use and Disclosure of Your Personal Information**

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

- The purpose for which it was provided or a secondary related purpose in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where the Australian Privacy Principles authorise use or disclosure where required or authorised under Australian law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

The Personal Information provided to us will only be used for the purpose of delivering our investment products and financial service requirements to you. These include:

- Your identification details used to process your application to our investment products, verify your identity and contact information, set up an account in your name, provide you with secure access to our website, process transactions and send you confirmations, manage your investment, ensure that you receive your distributions, provide you with information about your investment from time to time, improve the services we provide to you and to ensure that we comply with our legal and regulatory obligations.
- During the time you employ our services, we will hold information about you.
- Your Tax File Number and Australian Business Number (where relevant) will be collected in order for us to satisfactorily deliver our services and ensure that any investments are taxed correctly.
- Your identification details are used to provide you with information about any important changes and related services, as well as any changes to our business generally.

We are also required under the conduct rules of the professional bodies to make certain information available for inspection, on request, to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. At times, we may be obliged under the law to maintain certain transaction records available for inspection by regulators, courts and tribunals including the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA) and the Australian Transaction Reports and Analysis Centre (AUSTRAC).

---

<sup>1</sup> Related entities of PPFG retain professional memberships across its financial service offerings including CPA Australia, Financial Planning Association of Australia, Finance Brokers Association of Australia and other bodies

We may also in some situations, disclose Personal Information to your agents including:

- Your financial advisor;
- Any administrator or trustee for a fund or trust to which your investment or superannuation balance is to be transferred or rolled over;
- your legal representative or attorney;
- your employer for superannuation purposes (only to the extent required by law).

If considered appropriate we may use your Personal Information for the purpose of providing you with direct marketing material that may be of interest to you, however you may, by contacting this office in writing, request not to receive such information and we will give effect to that request.

We will only disclose personal information to third parties (agents, external service providers or representatives) carrying out functions on behalf of PPFG on a confidential basis. It is a condition of our agreement with each of the above that they adhere to the Privacy Act.

#### **Security of the Information You Provide**

Your personal information is generally held in your client file. PPFG may use third party applications to assist with this including for communication and marketing purposes. Use of such third party applications to process data may involve data being stored on servers outside of Australia. All data stored by third parties is currently held securely for the exclusive benefit of PPFG and for the purposes outlined above. By providing your personal information you consent to this usage.

In the event of a data breach, PPFG will perform an assessment to determine whether the access or disclosure of the personal information is likely to result in serious harm to the individuals to whom the information relates. If PPFG determines a severe data breach has occurred, then the individuals affected will be notified as soon as practicable of the details of the breach and the recommended steps to take in response to it. If required, PPFG will also inform the Office of the Australian Information Commissioner.

We will, at all times seek to ensure that the Personal Information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your Personal Information is treated as confidential and any sensitive information is treated as highly confidential.

In accordance with our commitment to data security:

- Access to the back office of PPFG is controlled by only allowing personnel employed by PPFG and associated entities access to the premises;
- All computer based information is protected through the use of access passwords; and
- Data is backed up regularly and stored electronically off site.

#### **How long do we keep your personal information?**

We will only retain Personal Information for as long as we consider, in our reasonable opinion, to be necessary to comply with applicable law or for the relevant purpose (as set out in this policy).

When we no longer need your personal information, we will seek to delete, destroy or de-identify it in accordance with our record retention policy and any applicable laws.

#### **Access to Your Personal Information**

You may at any time, by contacting us, request access to your Personal Information and 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. Although there is no charge for making a request to access your information, we do have the right to charge you for our time in compiling the information you ask for. 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:

- Access to the information would reveal any confidential formulae or the detail of any in house evaluation process, but may instead provide you with the result of the formulae or process or an explanation of that result;
- Providing access would pose a serious threat to the life or health of a person;
- Providing access would have an unreasonable impact on the privacy of others;
- The request for access is frivolous or vexatious;
- The information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- Providing access would be unlawful;
- Denying access is required or authorised by or under law; or
- 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 cannot comply with your request to access to your Personal Information, we will provide you with an explanation for that refusal.

#### **How to amend Your Personal Information**

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 and provide to us evidence of the discrepancy. If we agree that the mistake requires correction, we will take all reasonable steps to correct it.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your Personal Information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

We will endeavour to respond to any request for access within 14 days depending on the complexity of the information and/or request. If your request is urgent please indicate this clearly.

#### **Complaints Resolution**

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact this office in the first instance and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to within 28 days. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

**How to contact us:**

If you have any questions in regard to your privacy, please contact the Privacy Officer.

**PPF Financial**

Post: Offices 209-210, 20 Convention Centre Place, South Wharf VIC 3006

Phone: 03 9690 1500

Fax: 03 9690 1544

Email: [financial@ppf.com.au](mailto:financial@ppf.com.au)

You may also contact:

**Office of the Australian Information Commissioner**

Post: OAIC, GPO Box 5218, Sydney NSW 2001

Phone: 1300 363 992

Online: [www.oaic.gov.au](http://www.oaic.gov.au)

**Changes to this privacy policy**

This privacy policy may change from time to time. We will display our current privacy policy on our website and we may notify you when significant changes are made. Before providing us with personal information, please check this policy for any changes either by accessing our website or by contacting us as set out above to request an up to date copy. This privacy policy was last updated on 31 January 2023.