

Privacy Policy

1 Overview

Protecting clients' privacy is very important to us. To ensure our compliance with the Privacy Act 1988 (Cth) (the Privacy Act) and as part of our commitment to ensuring the safety of our clients' private and confidential information, we have established and implemented this Privacy Policy (the Policy).

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles, which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations in the financial industry.

If you would like more information about how we protect your privacy, please contact us.

Purpose

The Policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the Australian Privacy Principles (APP).

2 Collection

What information do we collect?

We will collect and hold your personal information for the purpose of providing financial advice services to you.

The type of information collected from you includes information that is necessary for us to provide advice to you. We may ask you to provide personal information such as:

- Your name, age and occupation
- Your income, expenses, assets and liabilities
- Your tax file number (TFN)
- Details of your partner and dependents
- Your current insurances

We will only collect sensitive information, such as health if reasonably necessary to provide you with financial products and services.

If you do not provide us with personal information of the type indicated above, or you provide incomplete or inaccurate information, we may not be able to provide you with advice that is appropriate to your needs, circumstances and objectives.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information.

For example, in addition to obtaining personal information from you, whenever you acquire a new product or service via us, we will need to obtain certain documentary evidence from you as to your identity to ensure compliance with AML/CTF laws. Such evidence may include for example a certified copy of your driver's licence, passport or birth certificate.

If we receive any information about you that is unsolicited and is not required to be collected for the purposes outlined in this section, we will, if it is lawful and reasonable to do so, destroy the information or ensure the information is de-identified.

This information is collected through the completion of fact finding documents and product applications, generally in face to face meetings with you.

If we receive any information about you that is unsolicited and is not required to be collected for the purposes outlined in this section, we will, if it is lawful and reasonable to do so, destroy the information or ensure the information is de-identified.

3 Use of information

How do we use the information that we collect from you?

We use your personal information for the purpose providing financial services and advice to you. We may also, from time to time, use your personal information (excluding sensitive information) for the purposes of direct marketing to you. Generally, we will only provide you with direct marketing if you have consented for us to do so, and you are able to opt out of receiving direct marketing from us at any time by contacting your financial adviser.

4 Disclosure

Who do we give your information to?

We may disclose your information to the following parties:

- Product issuers with whom you are investing or taking out insurance policies with
- Internal staff members of The Lunar Group
- External compliance contractors for the purposes of auditing our financial advice
- Accountants, solicitors and other professionals to whom you consent to disclose your information for the purpose of providing services to you related to your financial planning requirements.

There are also situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).
- We may also disclose your information if you give your consent.

Will my information be disclosed overseas?

We may disclose your personal information to overseas recipients such as Cloudstaff Pty Ltd (ABN 42 107 400 699) who facilitate an administrative hub on our behalf located in Clark, Philippines. Any overseas disclosure does not affect our commitment to safeguarding personal information we collect and we will take reasonable steps to ensure overseas recipients comply with the APPs.

5 Storage of your information

We will store your personal information in files within secure office premises, as well as electronically on financial planning software and on secure servers. We have security and privacy measures in place to ensure the integrity of your personal information and to protect it from misuses, interference and loss, and from unauthorised access, modification or disclosure.

Where we hold information that we no longer require for any purpose and it is not required to be maintained by Australian law, we will take reasonable steps to destroy the information or ensure that the information is de-identified.

6 Access and correction of information

Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested. Where we do not allow access, we will provide you with a reason (unless unlawful to do so) in writing, along with details of how you may make a complaint in relation to the refusal.

If you wish to access or correct your personal information, you may contact us through our offices or by writing to the Privacy Officer, whose contact details are set out below.

7 Complaints

If you believe that we have this Privacy Policy or the Australian Privacy Principles you may lodge a written complaint addressed to the Privacy Officer at the following address:

The Privacy Officer

The Lunar Group PO Box 1173
NORTH SYDNEY NSW 2059

The Privacy Officer will respond to your complaint within 30 days of its receipt.

You may also contact the Privacy Officer via email at info@thelunargroup.com.au or via phone on +61 2 9904 1555.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner.

You can lodge a written complaint with the Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: www.oaic.gov.au
- Submitting a hard copy form which can be obtained at http://www.oaic.gov.au/images/documents/privacy/privacy-complaints/making-a-privacy-complaint/Privacy_Complaint_Form.docx
- fax to 02 9284 9666
- email at enquiries@oaic.gov.au

8 Changes to our Privacy Policy

We may update or amend our Privacy Policy from time to time as required by law, or changes to our business. An up-to-date version of the Privacy Policy is available via our website www.stanfordbrown.com.au or by contacting our office on +61 2 9904 1555.