

PRIVACY POLICY

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At Sheridans Financial Services Pty Ltd we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

What information do we collect and how do we use it?

When we provide you with financial planning and advice services, we ask you for the information we need to ensure our recommendations made to you, accurately reflect your financial situation, needs and objectives. This can include a broad range of information ranging from your name, address, contact details and age to other information about your personal affairs including:-

- Your health and wellbeing;
- details of your financial needs and objectives;
- details of your current financial circumstances, including your assets and liabilities , income, expenditure, insurance cover and superannuation;
- details of your current companies, trusts, self-managed super funds and/or structures;
- details of your investment preferences and aversion and tolerance to risk;
- information about your employment history and circumstances, family commitments and social security eligibility;
- information about you that is needed for us to fulfil our requirements under the Anti-Money Laundering and Counter Terrorism Financial Act 2006

We may provide the information that you provide to:-

- organisations involved in managing payments and performing administration on your behalf;
- Government agencies , regulatory bodies and courts. The ATO, Australian Securities Exchange, APRA & ASIC have the power to order us to disclose information about a client's situation;
- insurers or intermediaries whom we ask to quote for your insurances to enable them to determine whether to offer you insurance and if so, on what terms;
- organisations involved in any insurance claim you may make to enable them to assess the likelihood of any payment;
- fund managers and insurance companies with whom we deal on your behalf to enable them to implement your financial strategies.

For life risk products, your health information will only be disclosed to service providers for the purpose of underwriting, assessing an application or assessing any claim when authorisation and consent has been provided by you.

We also use your information to enable us to manage your ongoing requirements and our relationship with you, e.g. financial reporting, events or articles we think may be of interest to you; product information and promotional material; updates on financial planning matters. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

We may also use your information internally to help us improve our services and help resolve any problems.

What if you don't provide some information to us?

If you do not provide us with some or all of the information that we ask for, we may not be able to recommend and provide the appropriate and/or adequate advice and services to meet your particular circumstances and/or specific needs.

How do we hold and protect your information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you in our hard copy client files and/or electronically in our client management system. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements. It is a legislative requirement that we keep all personal information and records for a minimum period of 7 years. Personal information will be treated as confidential information and sensitive information will be treated as highly confidential. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers in Australia who are also regulated by the Privacy Act.

We ensure that your personal, confidential and sensitive information is safe by having our computer based information protected through the use of access passwords which are routinely changed. Employees have restricted access to our computer systems that are only relevant to their specific position. Our computer systems and network are secured electronically and are monitored for security 24/7 by a reputable Australian based information technology provider. We also have sophisticated and up to date antivirus software installed across our network. Electronic information we hold is backed up daily and held off site. We maintain physical security over our paper and electronic data and premises, by using locks and 24/7 monitored security systems.

Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others. We will disclose your information to:-

- organisations involved in providing, managing or administering your policies/investments;
- auditors and other professional advisers;
- your professional advisers including your solicitor or accountant as authorised by you;
- our Authorised Representatives and support staff;
- information technology service providers;
- our solicitors or legal representatives;
- organisations involved in a transfer or sale of all or part of our assets or business;
- regulatory bodies, government agencies, law enforcement bodies and courts. The Corporations Act has provided ASIC with the authority to inspect information that is kept on our files. We collect information about you for the purposes of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.
- anyone else to whom the individual/Trustees/Directors authorises disclosure.
- and may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers, or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may also provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

We will not provide your information or disclose it to overseas recipients.

How can you check, update or change the information we are holding?

Upon receipt of your written request and sufficient information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information, please write to:-

The Privacy Officer
Sheridans Financial Services Pty Ltd
P O Box 118
GLENELG SA 5045
Ph. (08) 8376 0455
Email: fpcontactus@sheridans.on.net

We do not charge for receiving a request for access to personal information or for complying with a correction request. We may charge for costs incurred in accessing your information. These costs will be disclosed to you prior to providing you with the information.

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

What happens if you want to complain?

If you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer at:-

The Privacy Officer
Sheridans Financial Services Pty Ltd
P O Box 118
GLENELG SA 5045
Ph. (08) 8376 0455
Email: fpcontactus@sheridans.on.net

We will consider your complaint through our internal complaints resolution process and we will endeavour to respond with a decision within 45 days of you making the complaint

Your consent

By asking us to assist with your financial planning, and/or insurances, and/or other financial advice needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact:-

The Privacy Officer
Sheridans Financial Services Pty Ltd
P O Box 118
GLENELG SA 5045
Ph. (08) 8376 0455
Email: fpcontactus@sheridans.on.net

