

## Privacy Policy

This Privacy Policy covers Figtree Financial ABN 32 143 985 595 (**us, we** or **our**) and applies to all personal information and credit information collected by us.

We understand that the privacy of your personal information is important to you. This Privacy Policy explains how we handle your personal, credit and tax file number information (collectively referred to as “personal information” throughout this Privacy Policy). This Privacy Policy complies with the requirements of the *Privacy Act 1988* (Cth) (the Act) and the Australian Privacy Principles (APPs).

By providing your personal information to us you consent to us collecting, using and disclosing your personal information in accordance with this Privacy Policy.

We may change this Privacy Policy from time to time by publishing changes to it on our website. Please check our website regularly to ensure that you are aware of any changes to this Privacy Policy.

This Privacy Policy is available on our website or you are able to view this Privacy Policy at our office at any time.

### What is personal information?

*Personal information* is information or an opinion about an individual that is reasonably identifiable. For example, this may include your name, email address and contact details.

*Credit information* is personal information that is collected in connection with a credit application. For example, this may include identification information, default information or repayment history information.

### What personal and credit information do we collect?

The information we may collect from you and hold includes:

- name, residential or postal address, email address, date of birth, telephone numbers (including mobile and fax);
- information about dependents or family members;
- tax file number;
- details of your interactions with us;
- internet protocol address;
- location information;
- information about the type of device and operating system used by you;
- bank account details or credit or debit card details;
- Medicare number, pension card number;
- accounting and financial information;

- occupation, employment history and details;
- family commitments and social security eligibility;
- financial needs and objectives;
- assets and liabilities (current and future), income, expenses;
- superannuation and insurance details;
- risk profile details;
- health information; and
- any other relevant information that you give to us for the purpose of providing you with our products or services.

We may collect these types of information either directly from you or from third parties. We may collect information when you:

- when you seek our services;
- submit electronic or hard copy forms with us;
- visit our website;
- participate in a phone call with us; and
- email or otherwise correspond with us.

We may collect information about you from others such as:

- related entities;
- third party suppliers and service providers in connection with providing our products and services;
- public sources;
- your employer;
- your advisers;
- banks, financial institutions and other financial product providers;
- fund managers;
- superannuation funds; and
- life insurance companies.

If we receive any information which we have not solicited from you directly, we will take such steps as are necessary to lawfully destroy or de-identify such information if we cannot establish that we could have otherwise lawfully obtained the information.

### **Why do we collect, use and disclose personal and credit information?**

We may collect, hold, use and disclose your personal and credit information for the following purposes:

- to provide our products and services;
- to send service, support and administrative messages, reminders, technical notices, updates, security alerts, and information requested;
- to send marketing and promotional messages and other information that may be of interest to customers;
- to enable customers to access and use our website and services;

- to identify and control or minimise risks to our services;
- to enable us to monitor suspicious or fraudulent activity in relation to our services;
- to enforce compliance with our terms;
- to provide information to representatives and advisors, including lawyers and accountants, to help us comply with legal, accounting, or security requirements;
- where we believe it is necessary to protect our legal rights, interests and the interests of others, including in connection with legal claims, compliance, regulatory and audit functions, prevention of fraud, ensuring data security;
- to comply with our legal obligations, resolve any disputes that we may have with any of our customers, and enforce our agreements with third parties; and
- for any purpose related to the above.

If you do not provide us with the personal or credit information we request, we may not be able to provide you with the services or products you have requested.

### **Do we use your personal information for direct marketing?**

If you have consented to receive marketing emails, we may send you direct marketing communications and information about our services. This may take the form of emails, SMS, mail or other forms of communication, in accordance with the *Spam Act 2003 (Cth)* and the Act.

You may opt-out of receiving marketing materials from us by contacting us using the details set out below or by using the opt-out facilities provided (e.g., an unsubscribe link).

### **Who do we disclose your personal and credit information?**

We may disclose personal and credit information for the purposes described in this Privacy Policy to:

- related entities;
- third party suppliers and service providers in connection with providing our products and services;
- payment systems operators;
- banks or other financial institutions;
- fund managers;
- superannuation funds;
- life insurance companies;
- financial product issuers;
- anyone to whom our assets or businesses (or any part of them) are transferred;
- specific third parties authorised by you to receive information held by us;

- government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

### **Do we disclose personal or credit information outside Australia?**

We use reputable cloud-based storage systems (such as Microsoft), who store data primarily in Australia.

We will take reasonable steps to ensure that any service provider will deal with such personal information in a way that is consistent with the APPs and the Act.

### **Using our website and cookies**

We may collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser, but our websites may not work as intended for you if you do so.

### **How do we keep your information safe?**

We may hold your personal and credit information in either electronic or hard copy form. We take reasonable steps to protect your information from misuse, interference and loss, as well as unauthorised access, modification or disclosure and we use a number of physical, administrative, personnel and technical measures to protect your personal information. For example we:

- train our staff about how to keep your information safe and secure;
- ensure that our staff are aware of the confidentiality requirements imposed on them;
- only providing access to any personal information once proper identification has been given;
- have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised access to our systems;
- have building security measures in place;
- destroy and de-identify data when it is no longer required; and
- undertaking regular audits of the security and confidentiality measures which we have in place.

However, we cannot guarantee the security of your information. You should take all reasonable measures to protect your personal information (i.e., by protecting usernames and passwords). You should notify us as soon as reasonably practicable if you become aware of any security breaches.

## **Links**

Our website may contain links to websites operated by third parties. Those links are provided for convenience and may not remain current or be maintained. Unless expressly stated otherwise, we are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in those linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so we encourage individuals to read them before using those websites.

## **Accessing or correcting your information**

You can access the personal and credit information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your information.

If you think that any information, we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

We will respond to your request to accessing and correcting your information within a reasonable time after making the request. If we deny your request for access or correction of your information, we will provide you with written notices detailing the reasons for such refusal and the process for making a complaint regarding our decision.

## **Do we disclose information to credit reporting bodies?**

We do not disclose any of your credit information to credit reporting bodies including for the purpose of requesting a credit check on you.

## **Anonymity**

You may be able to deal with us without identifying yourself (i.e., anonymously or by using a pseudonym) in certain circumstance such as accessing our website, or via telephone or through a query on our website. Once you have engaged our services, it is no longer practicable for us to provide you with our services anonymously or through the use of a pseudonym.

## **Making a complaint**

If you think we have breached the Act, or you wish to make a complaint about the way we have handled your personal or credit information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will

acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time.

If you think that we have failed to resolve the complaint satisfactorily, we will provide you with information about the further steps you can take.

If you are not satisfied with how we have dealt with your complaint you can contact the Office of the Australian Information Commissioner using any of the following details:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

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

Contact Us

For further information about our Privacy Policy or practices, or to access or correct your information, or make a complaint, please contact us using the details set out below:

Privacy Officer

Daniel Snelson

T: 02 4322 1044

E: [info@figtreefinancial.net.au](mailto:info@figtreefinancial.net.au)

A: Suite 5 Level 2 69 Central Coast Hway West Gosford NSW 2250

**Effective:** March 2021