



Privacy Policy

NEO Financial Solutions Pty Ltd ("NEOFS") is committed to providing you with the highest levels of client service. Our aim is to both support & ensure that we comply with the National Privacy Principles as set out in the Privacy Act 1988 (Cth).

NEOFS respects your right to privacy & this policy sets out how we collect & treat your personal information. Personal Information is information we hold which is identifiable as being about you.

Your Personal Information

As a financial planning organisation we are subject to certain legislative & regulatory requirements which necessitate us to obtain personal information about you in order for us to:

- Provide you with the relevant financial product or service;
- Manage & administer the financial product or service; &
- Protect against fraud.

Below is some of the information you are required to provide:

- your name, date of birth, TFN, current addresses, telephone/mobile/fax numbers, e-mail address;
- information regarding dependents & family commitments
- your occupation, employment history, details family commitments, social security eligibility,
- your financial needs & objectives;
- your assets & liabilities (current & future), income, expenses;
- your superannuation & insurance details;
- your investor risk profile details.

How We Collect Personal Information

"NEOFS" collects personal information in a number of ways, including, when you interact with us electronically or in person, when you access our website, when we provide services to you, directly from fund managers or life insurance companies or other issuers of products once authorization has been provided by you.

You have a right to refuse us authorisation to collect information from a third party

How We Use Your Personal Information

Primarily, your personal information is used in order to provide comprehensive &/or scaled financial planning services to you.

From time to time, we may provide you with direct marketing material. This may include articles & newsletters that may be of interest to you. If, at any time, you do not wish to receive this information, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

Please note: If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

When We Disclose Your Personal Information

In line with modern business practices common to many financial institutions and to meet your specific needs, we may disclose your personal information to the organisations described below.

The Corporations Act has provided ASIC with the authority to inspect certain personal information that is kept on our files about you. We are also required to collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

For the purposes set out above, we may disclose your personal information to organisations outside "NEOFS". The organisations to which we disclose information may include:

- superannuation fund trustees, insurance providers, fund managers & other product providers in order to manage or administer your product or service;
- compliance consultants to ensure that our representatives are meeting our compliance standards;
- other professional advisers, including your solicitor or accountant as authorised by you;
- IT service providers to maintain, review and develop our business systems;
- government & regulatory authorities, as required or authorised by law;
- another representative of "NEOFS" if necessary; &
- a new owner of our business that will require the transfer of your personal information.

"NEOFS" takes its obligations to protect your information seriously, this includes when we operate throughout Australia & overseas, as part of our operations some uses & disclosures of your information may occur outside your State or Territory &/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

In the event that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence & it will be a condition of that disclosure that no personal information will be used or disclosed by them.

How We Store and Secure Your Personal Information

We keep your personal information in your client file. These files are accessible to authorised personnel only & are appropriately secured. Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly & stored securely off site.

Personal information will be treated as confidential information & sensitive information will be treated highly confidential. It is a legislative requirement that we keep all personal information & records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

Ensure Your Personal Information Is Correct

"NEOFS" takes all reasonable precautions to ensure that the personal information we collect, use & disclose is accurate, complete & up-to-date. To ensure we can maintain this level of accuracy & completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; &

- ☞ update us with any changes to your personal information as soon as possible.

Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. To access your personal information please email us at compliance@neofs.com.au with your request stating your advisers name & the information you require. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information. Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

Using Government Identifiers

In certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information.

Dealing with us anonymously

You can deal with us anonymously where it is lawful & practicable to do so. For example, if you telephone requesting our postal address.

Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. This is subject to some exceptions including:

- ☞ the collection is required by law; &
- ☞ When the information is necessary for the establishment, exercise or defence of a legal claim.

Our Website

When you visit our website

When you come on to our website we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

Cookies

As is very common for companies, we use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site & to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. We use cookies to improve the experience of people using our website.

Third party sites

Our site has links to other websites not owned or controlled by us. We are not responsible for these sites or the consequences of you going on to those sites.

Spam Act

Spam is a generic term used to describe electronic 'junk mail' - unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

"NEOFS" complies with the provisions of the Spam Act when sending commercial electronic messages. Equally importantly, "NEOFS" makes sure that our practices are in accordance with the National Privacy

Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

The three key steps "NEOFS" follows:

- ☞ Consent – only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- ☞ Identify – electronic messages will include clear and accurate information about the person and the organisation that is responsible for sending the commercial electronic message.
- ☞ Unsubscribe – we ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Viral messages

"NEOFS" ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have consented to receiving Commercial Communications.

Comply with the age sensitive content of commercial communication

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, "NEOFS" takes reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event.

Complaints Resolutions

Please contact our Privacy Officer (details below) if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, or require further information on privacy, you are entitled to contact the Office of the Federal Privacy Commissioner (<http://www.privacy.gov.au>)

Contact Details

Privacy Officer: Mark Woods

📍: **90 Edward Street Perth WA 6000**

☎: **08-9227-1472**

✉: compliance@neofs.com.au