Privacy Policy

We recognise that your privacy is important and are committed to responsible privacy practices.

We recognise that your privacy is important and we are committed to responsible privacy practices to protect your privacy and your personal information. Please read this Privacy Policy to understand how we collect, hold, use and disclose your personal information as part of providing financial advisory services to you. We hope that this will help you make an informed decision about sharing your personal information with us.

This Privacy Policy applies to Synchron Advice Pty Ltd (ABN 33 007 207 650) and all Authorised Representatives we have appointed to operate under our Australian Financial Services Licence (AFSL: 243313) ('we', 'our' or 'us').

What is personal information?

When used in this Privacy Policy, the term '*personal information*' has the meaning set out in the *Privacy Act 1988* (Cth) ('Privacy Act'). In general terms, 'personal information' is information (whether fact or opinion) about an individual who is identified or reasonably identifiable from that information or other information combined with that information.

Some types of personal information are classified as 'sensitive information' or 'health information', which are subject to additional protections under the Privacy Act (e.g. information about your racial origin or health status).

Types of personal information we collect

The types of personal information we collect about you may include:

- your name, contact details, date of birth and tax file number;
- your identification information;
- information regarding your dependents and family commitments;
- your occupation and employment history;
- your financial needs and objectives;
- your risk tolerance and risk profile;
- your assets, liabilities, income, expenses, insurances and welfare entitlements;
- your source(s) of wealth;
- your taxation information (including previous tax returns);
- your credit card and banking details; and
- any other personal information (or in limited circumstances, health information) we may require to provide you with the financial advisory services you have requested, or to comply with our legal or regulatory obligations.

How we collect your personal information

We collect your personal information directly from you, including when you:

- enquire about our financial advisory services;
- engage with us for the purposes of receiving financial advisory services;
- complete any questionnaire, application, fact-finding form or other documentation required to understand your financial position;
- communicate with us by email, by telephone, in person, via a website or otherwise;
- sign up to receive news or exclusive offers, promotions, or events; and
- visit our website (via cookies and other tools).

Where it is reasonable and practicable to do so, we will only collect personal information about you from you directly and not from third parties. However, in limited circumstances, we may collect personal information about you from third parties (such as your employer, accountant, broker or solicitor).

How we hold your personal information

We take reasonable steps to protect the personal information we hold from misuse, interference and loss, and from unauthorised access, modification or disclosure, including through the use of appropriate technical and organisational safeguards.

Your data will be retained only for as long as is needed. However, some personal information may be retained for varying time periods in order to comply with legal, compliance and regulatory obligations, and for other legitimate business reasons.

Purpose for collecting, holding, using and disclosing personal information

Depending on the advice or services you have requested, we may collect, hold, use or disclose your personal information for different purposes, such as to:

- provide you with comprehensive financial advisory services;
- comply with our legal and regulatory obligations (including under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth)), such as by disclosing your personal information to a regulatory authority;
- improve our financial advisory services;
- gain insights about you so that we can serve you better, understand your preferences and interests, personalise your experience and enhance the advisory services you receive;

- facilitate a legitimate business purpose of ours (for example, to inform an actual or proposed acquisition of our business);
- communicate with you about our services, including for marketing purposes; and
- communicate with you to address any issues or complaints that you may have regarding our financial advisory services.

We may also collect, hold, use and disclose your personal information for any other purpose that you have expressly consented to.

You may opt out of receiving direct marketing communications at any time by contacting us or by using opt-out facilities provided in the direct marketing communications.

Who we may disclose your personal information to

We may share your personal information with third parties in connection with the purposes described above, including the following:

- our related companies;
- our professional advisers (such as solicitors, accountants or auditors) and insurers;
- our employees, contractors and third-party service providers who assist us in performing our functions and activities (for example, cloud service providers, data storage providers, telecommunications providers and IT support services providers);
- our AFS licensee holder/authorised representative (as applicable);
- organisations authorised by us to conduct promotional, research or marketing activities;
- any potential third-party acquirer of our business or assets (and advisors to that third party);
- third parties to whom you have authorised us to disclose your information (for example, your employer, accountant, broker or solicitor); and
- any other entity as required or permitted by law (for example, regulatory authorities or law enforcement agencies).

We may also share non-personal, de-identified or aggregated information with select third parties for research, development, commercial, analytics or promotional purposes.

Your personal information may be disclosed to third parties located outside of Australia, in connection with the purposes described above. Where the recipient is not subject to data protection laws which protect personal information in a way which is at least substantially similar to the Australian Privacy Principles, we will take commercially reasonable steps to ensure the recipient does not breach the Australian Privacy Principles.

Access and correction

You may request access to the personal information we hold about you, or request correction of that information, by contacting us using the details below. We will deal with access and correction requests in accordance with the Privacy Act, including any legal exceptions that may apply. We may charge an administration fee for searching and providing access to your information.

Where we agree that your personal information needs to be corrected, we will take reasonable steps to update it and, where required, notify relevant third parties unless it is impracticable or unlawful to do so.

Privacy complaints

If you would like to complain about a breach of the Australian Privacy Principles, contact us via the below details and direct your complaint to the Privacy Officer. We will address your complaint within 30 days and aim to resolve it to your satisfaction.

If you are unsatisfied with our response to your complaint, you may complain to the Information Commissioner at the Office of the Australian Information Commissioner, the details of whom are set out as follows:

Office of the Australian Information Commissioner

Address: GPO Box 5218, Sydney NSW 2001
Phone: 1300 363 992
Online: www.oaic.gov.au
Email: enquiries@oaic.gov.au

Contact Details

Privacy Officer

Address: Level 5, 95 Pitt St, Sydney NSW 2000
Telephone: 02 9248 0422
Email: info@wtfglimited.com

This Privacy Policy may be updated from time to time. Please refer to our website for the latest version.

Synchron

Synchron Advice Pty Ltd ABN 33 007 207 650 AFSL 243313