

Privacy Policy

AUSTRALIAN PRIVACY PRINCIPLES

Insight Investment Services Pty Ltd ('Insight, we, us') ABN 22 122 230 835 holds an Australian Financial Service (AFS) number for providing personal and general advice and operates nationally through a network of representatives in most states.

It is Insight's policy to respect the confidentiality of information and the privacy of individuals. Insight is bound by the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 and established in the Privacy Amendment (Enhancing Privacy Protection) Act 2012. Our Privacy Policy sets out our commitment to those principles and we require all of our advisers and credit representatives to adhere to this policy.

We reserve the right to review and amend this policy from time to time and to notify you by posting an updated version on our website at www.insightinvestments.com.au

The Insight Privacy Policy is available free of charge to anyone who asks for it.

MANAGING YOUR PERSONAL INFORMATION

We are committed to being open and transparent about how we use your personal information. Where our documents ask for personal information, we will normally state the general purposes for its use and to whom it may be disclosed.

You can contact us to:

- seek more information about anything contained in this policy, or to request a copy of this policy in a different format;
- update or correct your personal information;
- opt out of receiving direct marketing material;
- ask about accessing or correcting the personal information we hold about you; or
- make a privacy related complaint in one of the following ways:
 - **By telephone:** +61 7 3018 0400;
 - **By email:** info@insightinvestments.com.au or
 - **In writing:** GPO Box 942, Brisbane QLD 4001

THE PURPOSES FOR WHICH WE COLLECT PERSONAL INFORMATION

As an Australian financial services organisation, we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you in order to provide you with financial advice and/or credit services.

We will not use or disclose personal information collected by us for any purpose other than:

- to establish, manage, and provide financial and/or credit products or services to you when advice is provided; or
- the advice related purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the Australian Privacy Principles authorise use or disclosure, where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

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

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THE KINDS OF INFORMATION WE ASK FOR

Our ability to provide you with a comprehensive financial advice and/or credit services is dependent on us obtaining certain personal and sensitive information about you, which may include (but it not limited to):

- details of your personal circumstances, including your name, address, date of birth, contact details or citizenship;
- details of your financial circumstances, including your account balances, tax and financial statements, assets and liabilities (both actual and potential), income, expenditure, insurance cover and investments and superannuation;
- information about your employment history, employment circumstances, family commitments and social security eligibility;
- details of your financial needs and objectives;
- details of your investment preferences and aversion to, or tolerance of, risk;
- details of your health for insurance and/or superannuation purposes; and
- details of your estate planning requirements.

You can deal with us anonymously where it is lawful and practicable to do so. If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our products and services.

Failure to provide the personal and sensitive information referred to above or choosing not to identify yourself or use a pseudonym may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of the advice or service we provide to you.

Collecting information about you also allows us to meet our legal obligations for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

HOW WE COLLECT AND HOLD YOUR PERSONAL INFORMATION

Insight will collect your personal information directly from you where this is reasonable and practical. We gather this information either through data collection forms, application or other forms that you complete, by recording the information you provide via phone calls, face-to-face interviews, email or the internet or other forms of communication. Insight may also collect personal information in a number of external ways including:

- directly from people authorised by you, such as:
 - employers, when a new employee joins their superannuation or insurance plan;
 - parents and guardians in respect of children;
 - accountants or lawyers; or
 - third party brokers (such as insurance or mortgage brokers)
- directly from external sources such as:
 - fund managers (such as superannuation funds or life insurance companies);
 - credit providers;
 - market research organisations (through surveys or telephone polls);
 - public sources of information (such as telephone directories);
 - credit reporting bodies; or
 - other product issuers once authorisation has been provided by you.

When we are provided with personal information about an individual from a third party, we seek to ensure the entity is aware of certain matters, such as Insight's identity and our contact details. We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services we have recommended, including:

- the provision of financial planning advice and/or credit service to you;
- the preparation of your advice document containing insurance, securities and investment recommendations;

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- the preparation of your credit document recommendations;
- implementing any recommendations made to you;
- reviewing your financial advice and/or credit service;
- reviewing insurance, securities and investment and/or credit recommendations; or
- considering other areas relevant to your needs and objectives.

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 other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

We are obliged under the Corporations Act (Cth) 2001, to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission (ASIC) where required to do so.

We may use the personal information collected from you for the purpose of providing you with direct marketing material, such as articles that may be of interest to you. However, you may, by contacting your adviser, request not to receive such information and they will give effect to that request. Please allow 14 days for your request to be actioned. We maintain a register of those individuals not wanting direct marketing material.

In the event that an adviser proposes to sell their business, or transfer to another licensee, they may disclose your personal information to a potential purchaser, or licensee, for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of their business is affected, or they transfer to another licensee, we may transfer your personal information to that purchaser of the business or licensee.

WHO MAY WE DISCLOSE PERSONAL INFORMATION TO?

Depending on the product or service concerned and particular restrictions on sensitive information, personal information may be shared with:

- other areas and organisations related to Insight who provide financial and other services;
- financial planners, brokers and those who are authorised by Insight to review customers' needs and circumstances from time to time;
- service providers and specialist advisers to Insight who have been contracted to provide Insight with administrative, financial, accounting, insurance, research or other services;
- superannuation fund trustees, insurance providers, wrap account service providers, managed discretionary account service providers, stockbrokers and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us;
- other insurers, including reinsurance companies, and credit providers;
- courts, tribunals and other dispute resolution bodies in the course of a dispute;
- anyone to whom we are required or authorised by law to disclose your personal information (such as the Australian Tax Office, Australian Prudential Regulatory Authority, Australian Securities and Investments Commission and Australian Transactions and Analysis Centre);
- credit reporting or reference agencies or insurance investigators;
- employers participating in our superannuation or insurance plans; or
- anyone authorised by you or to whom you have provided your consent (either expressly or implied), including but not limited to other financial services providers that we may need to deal with on your behalf

Normally, we require any organisation outside Insight who handles or obtains personal information as service providers to Insight, acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Australian Privacy Principles and this policy.

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WHO ARE OUR LIKELY OVERSEAS SERVICE PROVIDERS?

Insight takes its obligations to protect your information seriously, this includes when we operate throughout Australia or may deal with overseas entities. As part of our operations, some uses and disclosures of your information may occur outside of Australia that supply administrative, financial or other services to assist your adviser and the Insight group in providing financial advice and services to you. In some circumstances, we may need to obtain your consent before this occurs.

- The current list of countries to which your personal information could be sent is set out below:

Reinsurance providers	United States of America
Administration, research and other financial services and specialist advice	Canada, India, Malaysia, Philippines; or United States of America
Sending or receiving superannuation benefits overseas	United Kingdom, South Africa, New Zealand

- We normally require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles. Some Insight advisers or credit representatives may enter their own outsourcing arrangements to countries other than those listed above. Those arrangements will be disclosed separately by the adviser/credit representative to their clients.

HOW WE STORE YOUR PERSONAL INFORMATION

Your personal information is maintained securely and generally held in your client file. Information may also be held in a computer database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

In the event you cease to be a client of this organisation, any personal information that we hold about you will be maintained for a period of seven years from the date of the advice in order to comply with legislative and professional requirements, following which time the information will be de-identified and destroyed.

HOW YOU MAY ACCESS OR SEEK CORRECTION OF YOUR INFORMATION

You may request access to your personal information by contacting your adviser or Insight's Privacy Officer. We will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;

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- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

In the event that we refuse you access to your personal information, we will provide you with a written explanation for that refusal. We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information that we hold about you is inaccurate, incomplete or outdated, you may contact your adviser, or Insight's Privacy Officer, and provide us with evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

We will endeavour to respond to any request for access within 14 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

OUR WEBSITE

The following statements outline some privacy issues specific to the insightinvestments.com.au website.

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the web site, when you return to the web site, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on the Insight website, including presenting web pages according to your needs or preferences.

Cookies are frequently used on many website on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet Service Provider (ISP) should be able to assist you to set your preferences.

The Insight website has links to external party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered under this policy, and these sites are not subject to Insight's privacy standards and procedures.

WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT?

If you consider that any action of Insight, our advisers or credit representatives breaches this policy or the Australian Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint.

To make a complaint, please telephone us on +61 7 3018 0400, email us at info@insightinvestments.com.au or put your complaint in writing to:

Insight Privacy Officer
Insight Investment Services
GPO Box 942,
Brisbane QLD 4001

Your complaint will be considered as soon as possible and responded to in most cases within five working days of receiving your complaints. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if your complaint has not been resolved satisfactory, you have the right to complain to the External Dispute Resolution Scheme listed in the following table.

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Type of complaint	External complaints service
Personal information held	The Office of the Australian Information Commissioner on 1300 363 992 Website: oaic.gov.au Email: enquiries@oaic.gov.au

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au/privacy