

Our Privacy Arrangements

Who we are

We are Easdown & Partners Financial Services Pty Ltd ATF Easdown & Partners Financial Services Unit Trust trading as **Easdowns Financial Services**, ABN (82 781 447 251), corporate authorised representatives of SGN Financial Pty Ltd, Australian Financial Services Licence number 490523.

83 Trail Street
WAGGA WAGGA NSW 2650
Phone: (02) 6921 2058

What is the purpose of this policy?

This policy provides you with information about:

- The personal information that Easdowns Financial Services collects about you
- How we handle your information, including how we use, disclose, and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information.

As a business operating in Australia, we are required to adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), which regulate the collection, storage, use, and disclosure of personal and sensitive information. In addition, they also give individuals the right to access and correct any personal information that we have collected about them.

What information do we collect, and why?

We only collect personal information that is required for us to provide financial services or secondary related services to you and to satisfy our own legal obligations. Typically, we will collect this information directly from you, using a combination of meetings and questionnaires, or via our website where you send a request that includes personal information. We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

We do not utilise any standard personal identification reference numbers (such as Tax File, Medicare, or Centrelink numbers) as identifiers.

The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender, and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original or certified copy of your drivers' licence, passport, or other primary identification,

- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances, and
- Information about your financial needs, goals, and objectives.

It is important that you provide us with complete and accurate information, as we use this to develop appropriate strategies and research suitable financial products that suit you. While we will take reasonable steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you give us incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

We may record client meetings and use an AI tool to produce a transcript and file note of the meeting, and other documents such as internal instructions to follow up agreed actions after the meeting. As with all your information, the transcripts and file notes use secure software and are stored in accordance with our stringent data security protocols.

We will always advise you when we intend to record a meeting and seek your explicit consent to do so prior to starting the recording. You may decline to have any meeting recorded if you are not comfortable.

How will your information be stored?

We store all personal information in electronic format in facilities we own and/or in secure cloud-based storage. Hard copy paper files are stored securely with access restricted only to those staff who require your information to provide our financial services.

We maintain high data security standards to reduce the risk of unauthorised access to your information. However, should a data breach occur where we reasonably believe your personal information may have been compromised, we will contact you to notify you of the information that was compromised. In certain data breach situations, we will also be required to report to the Office of the Australian Information Commissioner.

Any original documents given to us will be returned to you after we have scanned them. We are required to retain most records for at least 7 years, or 7 years after the cessation of services being provided to a client. The Privacy Act also requires us to destroy or de-identify personal information when it is no longer required.

How will we use and disclose your information?

We only use and disclose your personal information for the purpose of providing you with financial services and/or for secondary related purposes, to carry on our financial services business compliantly and to seek legal advice about our affairs.

The information we collect will be used to develop an appropriate financial strategy to achieve your short, medium, and long-term goals, and determine which financial products (if any) should be acquired or replaced. Our support staff and outsourced contractors will have access to this information as required to assist with the development of your financial strategy.

Where we accept your instruction to acquire a financial product, we will disclose your relevant personal information to the financial product issuer or nominee.

We may also disclose your information to other third parties where required to deliver our financial services and/or secondary related services to you, or as required by law. These parties include issuers of financial products, custodians, life risk insurers, outsourced service providers such as paraplanning, administration support, auditors, accountants, lawyers, or quality assurance providers. In some instances, these providers may be based overseas. We currently have outsourcing arrangements that store and/or access data in the Philippines.

Where your information is shared with a third party outside Australia, we will take reasonable steps to satisfy ourselves the third party has arrangements to comply with the requirements of the Australian Privacy Principles. This includes ensuring the third party agrees to meet the necessary privacy standards in their agreement with us.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

Overseas data disclosure

From time to time, secure AI software may be used to create administrative efficiencies, for instance reporting on pending client administration and back-office tasks and creating correspondence following a meeting which has been recorded with your consent. We may also use secure AI software with human oversight to manage some compliance tasks. We do not load personal information into publicly accessible GPTs or large language models.

We may use Google Cloud Platform and Google Workspace for data storage and processing. Some data is processed and stored in the United States (Google's us-central1 region). Primary client records are stored in Australia. As required by APP 8.1, we take reasonable steps to ensure your personal information is protected when disclosed to overseas recipients.

We rely on a binding Data Processing Addendum with Google that restricts Google's use of your data to providing services to us, prohibits use for Google's own purposes, and requires Google to assist us in responding to data access and correction requests. Google Cloud maintains ISO/IEC 27001 and SOC 2 Type II certifications as independent assurance of its security controls.

How can you access or correct the information we hold about you?

We will take reasonable steps to ensure that the personal information we hold about you is accurate, up to date, relevant and complete, including when it is used or disclosed. If you identify inaccuracies with the information we hold, or there are changes to your circumstances, you can contact us to correct or update the information we hold. If we do not agree with your corrections, we may refuse to update the personal information, in which case we will provide you with a written explanation as to why.

The Privacy Act allows you to seek access to your personal information. To request access, please contact your Adviser on (02) 6921 2058 and/or via email at financialservices@easdowns.com.au. There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

How can you complain about our handling of your information?

If you have a complaint about how we have collected, used, or stored your personal information, you can direct your complaint to our Complaints Manager at:

Email: financialservices@easdowns.com.au
Writing to: Easdowns Financial Services
PO Box 674
WAGGA WAGGA NSW 2650
Phone: (02) 6921 2058

Alternatively, you may contact the Office of the Australian Information Commissioner by submitting a complaint through their [online form](#), or by contacting them at:

Privacy Complaints
GPO Box 5288
Sydney NSW 2001

Phone: 1300 363 992
Fax: 02 6123 5145.