



Synchron Privacy Policy

July 2020

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1 Introduction

Synchronised Business Services Pty Ltd ('Synchron') is committed to ensuring the confidentiality of client's personal information in accordance the Privacy Act 1988 and the Australian Privacy Principles (APPs).

1.1 Purpose

The following document aims to detail how a client's personal information is handled by Synchron, its Authorised Representatives and staff.

1.2 Definitions

| Term | Definition |
|----------------------------|--|
| AFSL | Australian Financial Services License. |
| ASIC | Australian Securities and Investments Commission. |
| AUSTRAC | Australian Transaction Reports and Analysis Centre. This is the regulator responsible for policing the AML/CTF Act. |
| Authorised Representatives | Those persons who have been provided with the authority to use the Synchronised Business Services Pty Ltd Australian Financial Services License to provide personal financial planning services. |
| Clients | Those people or peoples who receive a service from and Authorised Representative or a staff member of Synchronised Business Services Pty Ltd. |
| Synchron | Synchronised Business Services Pty Ltd [ABN 33 007 207 650] [AFSL 243313]. |
| Synchron Board | Synchronised Business Services Pty Ltd [ABN 33 007 207 650] has a board which consists of two internal directors and one independent chairman. |
| Synchron Staff | A person employed or contracted by Synchronised Business Services Pty Ltd. |

1.3 Dependencies

- *Changes to industry standards;*
- *Changes to the Privacy Act 1988;*
- *Changes to the Privacy Amendment (Enhancing Privacy Protection) Act 2012;*
- *Changes to the Australian Privacy Principles;*
- *Changes to the Best Practice Standards;*
- *Changes by Regulators;*
- *Changes to the Risk Management Framework.*

2 Why we collect information

We collect information from clients for a number of reasons including:

- To deliver products or services to clients;
- To improve our service to clients;
- Preparing financial plans;
- To provide financial advice to clients;

- Establish and manage investments and accounts;
- Implement investment and insurance instructions;
- Process any contributions, transfers or payments of benefits;
- Monitor and report on investment performance of a client's account;
- Reviewing financial plans;
- To provide clients with future products and services they may be interested in;
- To fulfil our regulatory and legislative requirements.

3 How we collect this information

Information is generally collected from:

- When we ascertain from clients the facts necessary to make a fair and reasonable assessment of their insurance or financial needs and objectives ("Fact Find");
- When a client completes an application form for insurance;
- When a client completes an application form for an insurance claim;
- When a client completes an application form for investments;
- When a client completes an application form for superannuation
- When a client completes an application form to increase their level of insurance;
- When a client completes supplementary medical or financial questionnaires.

If a client is unable to provide us with their personal information, we may not be able to organise for them to receive a product or service. Clients can nominate an Authorised Representative to access their personal information. This can be revoked at any time.

Synchron may collect personal information from a third party (such as another Financial Adviser, Product Provider or Medical Practitioner) or a publicly available source but only if the client has consented to the collection or it can reasonably be expected that it has been provided by the client.

3.1 Privacy on the internet

Synchron and our Authorised Representatives may use websites to collect personal information from clients. Clients and Authorised Representatives may receive a password and a personal identification number to access details online. It is a condition of use that this information is kept confidential and secure at all times.

3.1.2 Cookies

These are text files stored on a person's computer when they visit a website. Its sole purpose is to identify users and possibly prepare customised web pages or to save site login information. Synchron and our Authorised Representatives may use cookies on our websites.

Cookies can be purged from your browser after every use. This is generally a very simple procedure. Please refer to your browser's help file for more information.

3.1.3 Links to third party websites

Synchron and our Authorised Representatives may provide links on our web pages to external industry parties. The content and views expressed on these third party websites are not the responsibility of Synchron or our Authorised Representatives.

3.2 Tax File Numbers

Synchron and our Authorised Representatives may need to collect a client's tax file number to provide them with a product or a service (for example, managed fund investments and superannuation products). However this information must be kept securely and destroyed or permanently de-identify TFN information where it is no longer required.

4 What we collect

The personal information generally collected includes:

- Name;
- Address;
- Phone number;
- Email address;
- Age details;
- Occupation;
- Financial details;
- Health Details;
- Transaction information;
- Bank account details;
- Tax File Number;
- Income details from employers;
- Details of dependents;
- Beneficiary details.

Where the information is deemed to be sensitive, for example, the collection of health information, there will be a higher level of privacy protection afforded.

5 Disclosure of personal information

There may be cases where Synchron and our Authorised Representatives will need to disclose a client's personal information to third parties. This is generally to assist us in providing the client with a product or service. This may include:

- Doctors, medical services or other organisation to help assist with the collection of information for an insurance application or a claim;
- Any fund (investment administrator or superannuation trustee) to which a client's benefit is transferred, created or rolled over;
- Employers where it relates to a client's employer sponsored superannuation arrangement;
- A client's personal representative or any other person who may be entitled to receive the client's death benefit;
- An external dispute resolution service, insurer or legal representative (where required or applicable);
- The policy owner (where the client is the life insurer but not the owner);
- Exchange of information with authorised financial institutions to confirm bank account details for payment.

If required by law or a regulatory body to do so, Synchron and our Authorised Representatives will comply and provide the appropriate body with the required client information.

6 Collection of sensitive information

Where a client applies for certain life risk products (such as life insurance, trauma insurance, total and permanent disability insurance) it will be necessary for Synchron and our Authorised Representatives to collect sensitive information about a client's health. This information will only be collected when the client gives their consent by completing the product's application form. The information will be sourced by the Life Insurance company from the client, their medical professional and by other medical professionals where medical tests may have been performed. Due to confidentiality, it is sometimes the case whereby Synchron or the Authorised Representative may not be made fully aware of the medical circumstances by the Life Insurance company.

Unless required by law, the collection of sensitive information should only occur if the client has consented to the collection of the information.

7 Where we operate

Synchron operates in the following countries outside Australia:

- The Philippines.

Clients' personal information may be shared with Synchron employees in that country.

8 Sending personal information overseas

If we send a client's personal information to overseas recipients, we ensure that appropriate data handling and security measures are in place.

Authorised Representatives of Synchron may enter their own outsourcing arrangements and send information to countries other than those listed above. Those arrangements must be disclosed separately by Authorised Representatives to their clients.

9 Privacy Officer

Synchron has nominated a Privacy Officer to handle any queries or issues related to Privacy. This person has been nominated at a senior level and has access to the Board.

Name: John Prossor
Phone: 03 9328 3900
Email: j.prossor@synchron.net.au
+Post: PO Box 438
North Melbourne VIC 3051

If a client wishes to make a complaint in relation to a potential breach of the Privacy Act or the APPs, we will address their concerns through our complaints handling process. All complaints will be given fair consideration and will aim to be resolved within 45 days. We encourage clients to submit their complaint to the nominated Privacy Officer (details above) either via email to post. Where it is found that we are unable to finalise the investigation of a client's complaint within 45 days, we will contact the client to request an extension.

If a client believes they did not receive a satisfactory resolution to their concern, they may contact the Office of the Australian Information Commissioner. They are able to do so by:

- Visiting www.oaic.gov.au and submitting an online form;
- Obtaining a hard copy form at www.oaic.gov.au/about-us/contact-us-page;
- Phone: 1300 363 992;
- Fax: 02 9284 9666;
- Email: enquiries@oaic.gov.au

The Office of the Australian Information Commissioner is also available via Social Media outlets. Please refer to the Contact Us page at www.oaic.gov.au/about-us/contact-us-page.

10 Sale of an Authorised Representative's business

In the event that either our Authorised Representative or we propose to sell our business, or if an Authorised Representative is no longer eligible to provide advice, we may disclose some of a client's personal and sensitive information to potential purchasers for the purpose of conducting due diligence investigations. Any such disclosures will be made in the strictest confidence and conditional that no personal information will be used or disclosed by them. In the event of a sale being effected, we or our Authorised Representatives may transfer a client's personal information to the purchaser of the business. In this instance, the client will be provided a notice by mail to their last known mailing address that such a transfer will be taking place. They will then have the opportunity to object to the transfer within 14 days of the date of the notice.

11 Access to personal information

Clients are able to access any personal information that is held by Synchron or our Authorised Representatives subject to limited exceptions or required by law. The following factors will be considered:

- The information is related to a commercially sensitive decision making process;
- Access would be unlawful;
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice an investigation of possible unlawful activity.

To access the information, a client will need to contact the Privacy Officer as detailed in this policy.

Clients may be charged a small fee applicable to the collection and provision of their personal information but will be notified of this fee prior to processing their request. The Synchron Privacy Officer will be able to advise the client how long it will take to provide the information. Generally however, clients will receive the requested information within 14 days of the request.

If a client believes that the personal information that Synchron or our Authorised Representatives hold about them is incorrect, they have a right to request their personal information be corrected.

Where Synchron or our Authorised Representatives are unable to provide a client with the information they have requested, the reasons that the information could not be provided should be explained to the client.

9.1 Anonymity and pseudonymity

Clients are entitled to remain anonymous or use a pseudonym when dealing with Synchron or our Authorised Representatives. However, it may not be possible to assist client with requests if they wish to remain anonymous or use a pseudonym.

12 Security

Synchron and our Authorised Representatives strive to ensure the security, integrity and privacy of personally identifiable information. Only those authorised to do so are able to access such information. All client information is kept in a secure location and can only be accessed by authorised personnel.

However, although Synchron and our Authorised Representatives strive to ensure a client's security, no data transmission over the internet can be guaranteed to be completely secure.

A client's personal information is kept for as long as it is required to meet the client's financial product or service needs. For record keeping, it is generally kept for a further period of at least seven years.

Synchron and Authorised Representatives are required to hold personal and sensitive information in as secure a position as possible. This will include but is not limited to:

- Locked offices;
- Locked filing cabinets;
- Limited access by staff;
- Storage via a third party online provider;
- Storage via a third party online platform.

Where the data is held by an online provider, Synchron or the Authorised Representative should ensure that access is limited and the data is held by a provider whose only aim is storage. Those who have access to personal information should have the appropriate training, knowledge, skills and commitment to protect personal information from unauthorised access or misuse.

Synchron and our Authorised Representatives are required to take reasonable steps to destroy or de-identify personal information held once it is no longer needed for any purpose for which it may be used or disclosed.

13 Review

11.1 Review Frequency

This policy will be reviewed every two years by the Compliance Manager or other nominated person to ensure it remains relevant to our business. Should amendments be required either at that time, or in any intervening period, those amendments will be made immediately and staff notified.

11.2 Revision History

| Author | Version | Date | Revision Details |
|---------------------|---------|---------------------------------|--|
| Rose Gonsalvez | 1.0 | 6 th September 2012 | <ul style="list-style-type: none">• Creation of Policy. |
| Rose Gonsalvez | 1.0 | 14 th September 2012 | <ul style="list-style-type: none">• Update of policy with feedback provided by John Prossor. |
| Rose Gonsalvez | 2.0 | 6 th March 2014 | <ul style="list-style-type: none">• Update of policy. |
| Rose Gonsalvez | 2.0 | 10 th March 2014 | <ul style="list-style-type: none">• Update of policy. |
| Stefanie Georgiades | 3.0 | 6 th June 2017 | <ul style="list-style-type: none">• Update of policy. |
| Stefanie Georgiades | 4.0 | July 2020 | <ul style="list-style-type: none">• Update of policy. |