

JOHNSTON GROCKE

Privacy Policy

The privacy of your personal information is important to Dulwich Group Services Pty Ltd trading as Johnston Grocke ("Johnston Grocke"). We are bound by, and committed to support the National Privacy Principles ("NPP") set out in the *Privacy Act 1988 (Commonwealth)* as well as any other applicable laws and codes affecting your personal information.

This policy outlines how we manage your personal information. It also describes generally the type of information held and how that information is collected, used and disclosed.

What personal information will be collected?

In the course of our activities, we collect and hold personal information about you. Such personal information is collected for the purpose of providing the service(s) you have requested. The nature of personal information we collect will depend on what service we are providing to you but will generally comprise, but not limited to, the following: -

- Personal details eg. name, address, contact details (phone, fax, email), date of birth
- Employment details and employment history
- Details of your financial needs and objectives
- Financial details including your assets and liabilities (both actual and potential), income and expenditure
- Details of your current investments, insurance cover and superannuation including amounts, investor numbers and bank account details
- Details of your personal goals and objectives
- Details of your investment preferences and aversion or tolerance to risk
- Health information including current health, smoker status and historical medical records
- Centrelink details including your benefit type and reference number
- Taxation information including your tax file number
- Estate planning details including status of wills, beneficiaries and powers of attorney

We will collect personal information directly from you in a manner that is lawful and fair and without being unreasonably intrusive.

During the course of our dealings with you, we will collect personal information such as when you subscribe to our investment newsletters, complete FinaMetrics, visit our website, deal with us over the telephone, send us a letter, have contact with us personally etc

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When we collect personal information directly from you, we will take all reasonable steps to inform you of the reasons for collecting that personal information, to whom we might disclose that information to and what will happen if you do not provide that information to us.

Wherever it is lawful and practicable, we will give you the option of not identifying yourself or not providing personal information when dealing with us. However, failure to provide full and complete information we request may mean that we are unable to provide you with the services you have requested completely and properly.

Once we hold your personal information we will take reasonable steps to keep it accurate, complete and up-to-date. We will de-identify and destroy the personal information we hold about you once our legal obligations cease.

We may also collect personal information incidentally. By providing us with unsolicited personal information incidentally, you consent to us using the information subject to applicable laws

What about sensitive personal information?

In certain circumstances we may request sensitive personal information such as health details. In doing so, we will request you consent to the proposed uses of that information. In the event that you provide us with unsolicited sensitive personal information, you consent to us using that information subject to applicable laws as described in this policy.

We do not collect information about political or religious beliefs, ethnic background or sexual preferences.

How will we use personal information collected?

We will only use the personal information obtained by us for the purpose of providing you with the service(s) you have requested. However, we may use personal information for an alternative purpose:

- Where you have provided consent (expressed or implied) to use personal information for that alternative purpose;
- Where the Privacy Policy (expressed or implied) permits us to use personal information for an alternative purpose;
- Where it would be reasonably expected that personal information would be used for that alternative purpose;
- Where it is permitted or required by law; or
- Where we reasonably believe it is necessary on health and public safety grounds to use the personal information for that alternative purpose.

Will we share your personal information to third parties?

We will not disclose personal information unless the disclosure:

- is required, or allowed under law, or in connection with legal proceedings;
- has your consent (expressed or implied); or
- is to organizations with whom we have a business relationship that are bound by strict confidentiality. For example, those authorised by us to provide limited financial, administrative and other services on our behalf. We will only provide such organizations the information they need to deliver the service. In such circumstances, notwithstanding that such recipients of personal information may not have privacy policies equivalent to ours, you consent to the disclosure of personal information for such purposes.

How can I access personal information held by you?

You may request in writing access to personal information held by us. This right of access is subject to exceptions allowed by law.

Factors affecting whether a request for access will be granted include situations where:

- Access is likely to pose a threat to the life or health of an individual;
- Access is likely to have an unreasonable impact on the privacy of others;
- The request is frivolous or vexatious;
- The information requested relates to commercially sensitive decision making processes;
- Access is likely to prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue; a security function, or negotiations with you;
- Access is likely to impact on legal proceedings; and or
- Existing laws prohibit disclosure of personal information.

In the event that a request for access is denied, we will provide the reasons for our decision.

We reserve the right to charge a fee for searching for and providing access to personal information.

How accurate is the personal information held?

We are committed to ensuring that personal information is accurate, complete and up to date. Accordingly, please advise us in writing of any changes to the personal information you have provided.

Furthermore, if you believe the personal information held by us is not accurate, complete or up to date, please contact us and we will take all reasonable steps to correct the information.

How is personal information collected stored?

We recognise the importance of maintaining the privacy of personal information. As a result, we have taken the following reasonable steps to protect the information we hold from misuse, loss and from unauthorised access modification or disclosure:

- Our employees are bound by confidentiality agreements;
- Security measures to restrict access to our systems; and
- Access control to our office space.

We will not retain personal information for longer than it is required by us, except to satisfy legal requirements.

Identifiers

We will not adopt as our own, any identifiers you may provide such as TFNs, Medicare numbers etc.

Complaints Resolution

We are committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. We will address any concerns you have through our complaints handling process.

If you have any concerns regarding the way we have handled personal information, please send us an e-mail at privacy@jgg.com.au (no spam please) or write to us at Reply Paid 77247 Level 1, 225 Greenhill Road DULWICH SA 5065.

Contact Details

If you seek further information regarding this Privacy Policy and or have any concerns about the privacy of personal information collected by us, please contact our Privacy Officer by :

- E-mail at privacy@jgg.com.au (no spam please), or
- Writing to us at Level 1, 225 Greenhill Road, DULWICH SA 5065, or
- Telephone on (08) 8364-3366