



## **Lets Make Money Privacy Policy**

### **1. Overview**

The collection, use, correction, disclosure and transfer of personal information about individuals by companies is governed by the Privacy Act 1988 (Privacy Act).

The protection of our client's privacy is very important to us. As part of our commitment to ensuring the safety of our client's private and confidential information, and as a mechanism to ensure our compliance with the Privacy Act, we have established and implemented this Privacy Policy (Policy).

#### Purpose

This Policy explains Lets Make Money Pty Ltd's (LMM's) policies and practices with respect to the collection and management of personal information we collect from you.

The Privacy Act requires us to handle your personal information in accordance with the Australian Privacy Principles (APPs). The APPs and our compliance with them are set out below.

### **2. Collection**

What information do we collect?

"Personal Information" is defined by the Privacy Act as information or an opinion about a person (or a person who is identifiable), whether true or not. We will collect and hold personal information about you for the purposes of:

- providing services to you
- managing and administering these services
- updating you on the services

The type of information collected from you includes information that is necessary to provide you with advice and perform work on your behalf. We may ask you to provide personal information, including:

- name
- email address
- residential and/or postal address
- date of birth
- contact details
- occupation
- bank account details
- details of investments held
- details of insurance policies held

- other financial details
- employer details
- driver's licence or other identification details
- tax file number (TFN)
- other information that may be necessary to provide you with advice

Much of this information is collected through forms you submit to us or ongoing communications with you.

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

There may also be specific circumstances in which we will ask for sensitive information about you, such as:

- personal health information from you when applying for insurance
- personal health information from medical practitioners when you are making a claim
- income or other information from employers or accountants in instances where you are applying for additional insurance protection or are entering into salary sacrifice arrangements.
- details of your dependents, as defined at section 10 of the Superannuation Industry (Supervision) Act 1993, for the purposes of estate planning or organising your finances in the event of your death.

We will always seek your consent before collecting this kind of sensitive information.

We may also request personal information about you from third parties, such as your other advisers, product issuers, accountants and employers.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for such required information about you, we will inform you of the obligation and the consequences of not giving us that information. For example, in addition to obtaining personal information from you whenever you acquire a new product or service through us, we will need to obtain certain documentary evidence from you as to your identity.

Such evidence may include items such as a certified copy of your driver's licence, passport or birth certificate.

What if you don't give us the information we request?

You are not required to give us the information that we request. However, if you do not give us information that we ask for, or the information you provide is not complete or accurate, this may:

- prevent or delay the processing of your applications or any claims
- affect your eligibility for specified insurance policies
- prevent us from contacting you
- impact on your tax matters

What do we do with your TFN?

We may ask for your TFN for the purpose of complying with taxation law or superannuation law. For example, we are required to ask for your TFN where you become a member of a superannuation product. You are not legally obliged to give us your TFN, but there may be financial consequences if you choose not to give it; for example, you may be subject to higher tax charges on your superannuation.

### **3. Use of information**

How do we use the information that we collect from you?

We use your personal information only for the purposes for which it has been obtained. We collect your personal information so that we are able to act on your request, such as:

- provide financial advice to you
- establish and review your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- facilitate contributions, transfer of monies or payment of benefits
- report the investment performance to you
- keep you up to date on services offered

Personal information may also be used in other circumstances where you have consented to such use.

### **4. Disclosure**

Who do we give information to?

We apply strict controls to ensure the personal information we collect is stored, used and disclosed in accordance with the APPs.

The types of external organisations to which we may disclose your personal information includes:

- organisations involved in providing, managing or administering services including actuaries, custodians, external dispute resolution services, insurers, investment managers or mail houses
- any fund (administrator or trustee) to which your benefit is to be transferred or rolled over
- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or any other person who may be entitled to receive your death benefit or any person assisting us to process that benefit
- financial institutions who hold an account for you
- professional advisers appointed by us
- businesses that may have referred you to us (for example, your accountant)

We may also disclose your personal information if:

- required by law (such as to the Australian Taxation Office)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force)

We will only disclose your information in other circumstances if you give your consent.

Will my information be disclosed overseas?

We do not disclose your personal information overseas, unless you have provided your consent (such as to a foreign government for foreign tax purposes).

## **5. Access and correction of information**

Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading. Reasonable steps that we may take include updating your personal information from public sources such as the internet.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested. If you wish to access your personal information, contact our Privacy Officer as listed at the end of this Policy.

## **6. How clients Opt Out?**

LMM conducts very little direct marketing, only sending out occasional newsletters by post or email to existing clients per year. Each newsletter contains an Opt Out clause with details for clients to either phone or email to be removed from the mailing list.

## **7. Complaints**

If you believe that we have mishandled your personal information, in turn, breaching the APPs, you may lodge a complaint with us. The complaint, must be in writing and addressed to the Privacy Officer at the contact details set out at the end of this Policy.

From receipt of your written complaint, the Privacy Officer has 30 days to respond.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC), as set out on the OAIC's website at [www.oaic.gov.au](http://www.oaic.gov.au).

## **8. Protection of the personal and sensitive information that we hold**

How do we protect the security of your information?

We have security systems, practices and procedures in place to safeguard your privacy. Your personal information may be stored on third party servers and is subject to regular audits. The people who handle your personal information for us have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

### Data Breach Notification

While LMM is committed to the security of our client data, should a notifiable data breach occur (i.e. when personal information is accessed or disclosed without authorisation, or is lost) we will promptly notify all clients affected by the breach in compliance with our obligations under the national notifiable data breach regime.

### Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact our Customer Service team to provide personal information directly to us.

## Cookies

A "cookie" is a small text file that may be placed on a computer by a web server. Our website may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the usability or effectiveness of our website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

## **9. General**

How long do we retain your personal information?

We are required by law to retain certain records of information for varying lengths of time. Depending on the context surrounding the information, we may be required to retain records which include your personal information from 7 years to permanently. Where your information is not required to be retained under law, we will take reasonable steps to permanently destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

### **Updates to this Privacy Policy**

This Privacy Policy is updated from time to time, with the most recent version being available online at:

[www.letsmakemoney.com.au](http://www.letsmakemoney.com.au)

How do I contact the privacy officer?

Should you have a query about this Policy or the personal information we hold for you, please contact Paul Goethel on 03 9585 8007.

Updated: 4 February, 2022

### ***Your Guarantee***

*As a professional practice and as a holder of Australian Financial Services Licence, as well as Paul Goethel the principal, being an Associate of the Financial Planning Association of Australia and a member of Association of Financial Advisers, we provide professional financial planning advice that we stand behind.*

#### **Contact Details**

Attention:	Privacy Officer
Address:	390 Reserve Road, Cheltenham, Victoria 3192
Telephone:	(03) 9585 8007
Facsimile:	(03) 9585 4007
Website:	<a href="http://www.letsmakemoney.com.au">www.letsmakemoney.com.au</a>
Email:	Imm@letsmakemoney.com.au