



Lets Make Money Pty.Ltd.

Financial Services Guide

You have the right to ask us about our charges, the type of advice we will give you and what you can do if you have a complaint about our services.

Key information is outlined in this Guide.

If you require more information or clarification, please ask us.

Lets Make Money Pty Ltd

ABN 13 092 771 581

Australian Financial Service Number 233808

390 Reserve Road, Cheltenham, Victoria, 3192

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What is a Financial Services Guide?

This Financial Services Guide (FSG) is an important document and is intended to inform you of certain basic matters relating to our relationship, prior to our providing you with a financial service. The matters covered by the FSG include who we are, how we can be contacted, what services we are authorised to provide to you and how we (and any other relevant parties) are remunerated. It also contains details of any potential conflicts of interest and details of our internal and external dispute resolution procedures and how you can access them, as well as our privacy policy.

Other documents you may receive from us

Before we commence meeting with you, we will forward to you a Preparation Guide for Meeting with Your Financial Planner as well as a Financial Fact Find. The Preparation Guide (including financial objectives) is designed to assist you in preparing for the meeting with your adviser. It also explains some of the commonly used terms. The Financial Fact Find is designed to assist you with summarising your personal information, including your attitude towards risk, in a concise manner.

You should also be aware that in most instances you are entitled to receive a *Statement of Advice* when we provide you with advice which takes into account your objectives, financial situation and needs. *The Statement of Advice* is required to be given to a person who is a retail client when personal financial product advice is provided. It will contain the advice, the basis on which it is given and information about fees, any commissions and associations which may have included the provision of the advice. Where, however advice is not required to be given in that form, we are generally required to retain a record of advice given and you are entitled to ask for a copy of this.

In the event we make a recommendation to acquire a particular financial product (other than securities) or offer to arrange the issue of a financial product, we must also provide you with a Product Disclosure Statement containing information about that particular product which will enable you to make an informed decision in relation to the acquisition of that product.

Privacy Policy

Lets Make Money Pty Ltd is committed to implementing and promoting a privacy policy which will ensure the privacy and security of your personal information. Our full Privacy Policy appears on pages 9 - 14 of this Guide.

Key information is set out in the form of answers to the questions below. If you need more information or clarification, please contact us.

Before you get our Advice

Who is responsible for the financial services provided?

Lets Make Money Pty Ltd is responsible for the financial services provided including the distribution of this Financial Services Guide (FSG).

Lets Make Money Pty Ltd, ABN 13 092 771 581
Australian Financial Services Licence Number 233808
390 Reserve Road, Cheltenham, Vic. 3192

Who is my adviser?

Your adviser will be Paul Goethel. His Australian Securities & Investment Commission (ASIC) number is 245417. Paul has over 30 years experience in the financial services industry and his formal qualifications include a Bachelor of Business (Economics & Marketing) and an MBA. Paul is an associate of the Financial Planning Association and a member of the Association of Financial Advisers as well as a member of the Australian Institute of Company Directors.

Paul Goethel is an Authorised Representative of Lets Make Money Pty Ltd.

What information should I provide to receive personalised advice suitable for my investment needs and financial circumstances?

You need to provide us with a list of your personal objectives, details of your current financial situation and any other relevant information, so that we can offer you the most appropriate advice possible.

You have the right not to provide information, if you do not wish to do so. However, if you do not, the advice you receive may not be appropriate to your needs, objectives and financial situation.

If you do not wish to act upon our advice, we may still deal on your behalf by carrying out your specific instructions.

If you do not obtain advice, you face the risk that the Financial Product/s you select will not fully take into account your objectives, financial situation or needs.

If we provide you with personal financial advice, then you are entitled to receive a 'Statement of Advice' on the first occasion that we provide you with personal advice, or a 'Record of Advice' if the advice relates to amounts under certain thresholds. These documents will:

- ✦ Explain the advice and the basis of the advice;
- ✦ Provide information about our remuneration (including any commissions), and
- ✦ Disclose any associations or relationships that could potentially influence us in providing the advice.

After providing you with our Statement of Advice, any ongoing personal advice that we may provide will be documented in a further 'Statement(s) of Advice' or a 'Record(s) of Advice' depending on the nature of the advice.

Copies of the Statement(s) of Advice or Record(s) of Advice will be retained on your file and if you have not already been provided with one you may ask for a copy of these documents at any time.

You should read the warnings contained in the *Statement of Advice* carefully before making any decision relating to the advice or the financial products.

If we provide you with execution related telephone advice, you may request a record of the execution related telephone advice at that time or up to 90 days after providing the advice.

If we provide you with an ongoing review service for your investments, within 60 days following the 12 months anniversary of that service, you will receive a Fee Disclosure Statement (FDS) covering the previous 12 months. This will be provided to you every year that that service is provided to you.

What should I know about any risks of the financial products or strategies that are recommended to me?

We will explain any significant risks of the financial products and strategies which we recommend to you. If we do not do so, you should ask us to explain those risks to you.

How can I give you instructions and tell you how I wish to instruct you?

You may tell us how you would like to give us instructions. For example by telephone, fax or other means such as email. We would require your signature to carry out an instruction not already in place.

When we provide advice to you, in most cases it will be provided in the format which the law requires,

i.e. a "Statement of Advice". This is a document which is required to be given to a person who is a retail client when personal advice is provided. Where, however, it's not required to be given in that format, we are generally required to retain a record of advice given and you are entitled to ask for a copy of this.

If we advise you to invest in certain investment product types such as a wrap product or managed investment, we are required to provide a copy of the most recent Product Disclosure Statement to you before investing. This will give you the opportunity to understand in detail the product features, risks and costs, before acting on our recommendation.

What kinds of financial services are you authorised to provide me and what kinds of Financial Product/s do those services relate to?

Paul Goethel is authorised by Lets Make Money Pty Ltd to provide financial product advice on and deal in financial products on behalf of another person on the following products:

- deposit & payment products including basic deposit products and deposit products other than basic products;
- debentures, stocks or bonds issued or proposed to be issued by the Government;
- life products including investment life insurance products as well as any products issued by a Registered Life Insurance Company that is backed by one or more of its statutory funds and life risk insurance products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds;
- interests in managed investment schemes including investor directed portfolio services;
- Retirement Savings Accounts (RSA) products (within the meaning of the Retirement Savings Account Act 1997);
- securities;
- standard margin lending facilities;
- superannuation to retail and wholesale clients.

At Lets Make Money we provide advice and review existing or anticipated financial situations relating to various circumstances including wealth creation strategies, project planning (e.g. children's education), investment advice, retirement planning, salary packaging, retrenchment, financial taxation planning, estate planning including the loss of a loved one, superannuation, financial issues on marriage dissolution, DIY superannuation strategies, gearing strategies, income generation in retirement strategies including pensions, social security strategies, budgeting, debt consolidation strategies, care accommodation planning, personal financial risk protection strategies etc.

We can offer a portfolio review service as part of our ongoing relationship with you.

We can also provide you with Limited or Scaled Advice should you only wish to discuss a particular issue. In such an instance, any advice would be limited or scaled to that particular matter.

What information do you maintain in my file and can I examine my file?

We maintain a record of your personal profile, including details of your objectives, financial situation and particulars as well as your needs. We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy which will ensure the privacy and security of your personal information. Our privacy policy appears on pages 9 - 14 of this Guide.

If you wish to examine your file please ask us. We will make arrangements for you to do so.

How will I pay for the service?

a) Advice

The initial consultation will be charged at \$242.00 including GST. This consultation usually lasts approximately 1 ½ to 2 hours and you will receive a Statement of Advice following that meeting that covers our discussions. If other work is required, such as design of a strategy, we will discuss and estimate the cost of such work, depending on the amount of work needed to be done and the complexity of the work.

Once agreed by you, we will undertake the work. The fee will be based on an hourly rate of \$385.00 including GST for advice and \$121.00 per hour including GST for administration and routine work or on a project basis.

Lets Make Money may charge an implementation fee which will be based on the complexity of work or percentage based of up to 0.7% including GST on the funds you invest. Lets Make Money will not receive upfront commissions from the organisation with whom the funds are placed. In the event that due to the structure of some products, the commission cannot be rebated, such as life risk products, that commission will be disclosed and used to offset the implementation fee.

For example, you have agreed for Lets Make Money to design a strategy for you and as a result of that strategy you will invest \$100,000. Lets Make Money (will not receive any upfront commissions for placing that investment) may charge you up to 0.7% or \$700.00 including GST for the implementation and establishment of that investment.

b) Ongoing Relationship

A fee of \$385.00 including GST per hour for advice including meetings and discussions with your adviser is charged. Also \$121.00 including GST per hour is charged for administration or other routine work done for you.

Lets Make Money also provides an ongoing proactive review service to its clients, at a flat per annum dollar rate as agreed by you, but generally that would not be more than at the rate of up to 0.9% pa including GST of the value of the portfolio. This will depend on the size and the complexity of the investment and the strategy. By way of an example if \$100,000 is invested, then over a 12 month period the 0.9% would equate to \$900.00 including GST. An additional fee of \$85.00 including GST is charged for any switches done as a result of the recommendations made by us and agreed by you, resulting from the ongoing portfolio review.

A fee of \$85.00 including GST is charged for simple, standard superannuation rollovers under \$10,000 and withdrawals.

Lets Make Money may also receive trailing commissions paid by some product providers for products that were entered into before 30th June 2013. Any such trailing commissions, if paid, will be fully disclosed to you.

Investment Products entered after that date generally do not have any trailing commissions on them.

c) Commissions

It is our policy to charge you a fee for service for the work undertaken on your behalf as described above, rather than to receive commissions from product providers. However, in some instances, where commissions are built into a product, e.g. insurance products, Lets Make Money may receive a commission calculated as a percentage of the premium paid by you.

In the case of insurance products, this can be generally between 0% and 125% of the first year's amount paid by you. Any such commissions will be fully disclosed to you. As a way of an example, if you paid a premium of \$500, Lets Make Money Pty Ltd could receive between \$0.00 and \$625.00. You should also be aware that in some cases commission arrangements would be in place for as long as you retain the policy. This can be generally between 0% and 35% of the amount paid. By way of example, if you paid a premium of \$500.00, Lets Make Money Pty Ltd could receive between \$0.00 and \$175.00. Any such commissions will always be fully disclosed to you.

The amount paid is a result of the way the pricing on insurance products is structured and the fact of the payment doesn't mean that you are entitled to, or will receive, advice about your insurance needs prior to insurance renewal dates, as these services are also separate from our ongoing service offering.

How are any commissions, fees or other benefits calculated for providing the financial services?

If you receive personal advice from us, we will always tell you about any fees and any other commissions or benefits in the *Statement of Advice or Record of Advice*. You will receive such in a *Statement of Advice or Record of Advice*, before we proceed to act on your instructions.

- we may invoice you a fee when you receive our written recommendations;
- we may charge you a fee, depending on the time we spend developing your plan or depending on the value of funds you invest;
- you may be required to pay us a review fee annually or in instalments;
- we may be paid by the Financial Product issuer at the time you invest or contract and during the life of your contract; (in the instance of risk products)
- we may receive an ongoing payment from the Financial Product issuer.

Details of the payments we receive from Financial Product Issuers are contained in the *Product Disclosure Statements* issued by most Financial Product providers and these are available from your adviser.

Your adviser will tell you in writing in the *Statement of Advice* what fees we may charge you, when you will be required to pay and what payments we may receive from the Financial Product issuers. Our fee schedule appears on pages 5 & 6 of this document for your information.

Where you have transferred to us from another adviser

If you have previously been the client of another adviser firm and you are now proposing to transfer to Lets Make Money, the consequence is that in respect of your existing investments:

- if your previous adviser was receiving ongoing commission from product providers in relation to risk or investment products held by you, these payments will be received by us; and
- you may wish to review with us the remuneration arrangements in place in respect of those investments.

Do you have any relationships or associations with Financial Product Issuers?

Whilst this does not influence directly or indirectly any advice provided by Lets Make Money or Paul Goethel, its Authorised Representative, you should be aware that Paul Goethel is a minority shareholder in Spitfire Ltd who are the holding company for Wealthtrac Pty Ltd. He may ultimately be a beneficiary to dividends made by Spitfire, along with other shareholders and beneficiaries from time to time.

From time to time, payments or other benefits may be made to this Company by particular product or service providers. These can be in the form of payments for the cost incurred in relation to time and work associated with that product or provider eg interstate flights, accommodation, attendances at certain conferences and trade fairs.

Whilst these do not influence, either directly or indirectly, any recommendations made, you should be aware that they can be received and full receipts of these will be maintained in registers of such payments/benefits. Some product/service providers may pay, from their own resources, an ongoing amount set as a small percentage of .22% pa including GST or less of the value of the aggregate of clients investments through that Company, as at 30th June, 2013, to cover the time and work associated with that product/service. As an example, if the total of the value of clients' investments with a particular organisation as at 30th June, 2013 was \$100,000.00, over a 12 months period this Company would expect to reimburse Lets Make Money Pty Ltd \$220.00 or less for the time and work in relation to these investments.

However, this does not affect the advice or recommendations provided to you. Lets Make Money, like some other firms, may be members of fund manager loyalty programs and where this is the case, we will detail any benefit received in the *Statement of Advice* or *Record of Advice* provided to you.

What does our advice mean to you?

Elsewhere in this document we have told you what we are licensed to do. This is what it can mean to you:

Initially

When we first meet, we will ask you for as much information about you, your family, your needs and objectives to provide you with advice. We will assist you to define your financial objectives and goals so that we can agree on the content of your advice.

Following the examination and research into your objectives, we will prepare a written document called a Statement of Advice. Such initial advice is designed to examine your present situation and arrangements and advise you whether any changes are needed to ensure that your resources are used efficiently and you are on your way to achieving your goals and objectives. Following the agreement on that initial advice, we can work with you to implement any changes that are needed.

Continuing Advice

When you ask us to review your investments, we review your portfolio and advise you whether, in our opinion, you need to make any adjustments. We also assist you and review your financial strategy on an ongoing basis, where you mandate us to do so.

There are also other unforeseen events that occur such as changes to legislation that would need our input. As such, we develop and continue to grow an interactive relationship with you over time.

What should I do if I have a complaint?

Lets Make Money Pty Ltd is a member of the Australian Financial Complaints Authority (AFCA).

If you have any complaints about the provision of financial services provided to you, you should take the following steps:

1. Speak with your adviser about your concerns.
2. If your complaint is not satisfactorily resolved within 7 days, please contact The Client Liaison Manager on 03 9585 8007 or put your complaint in writing and send it to us at 390 Reserve Road, Cheltenham, Vic. 3192. We will respond and endeavour to resolve your complaint within 45 days.
3. Whilst every effort will be made to resolve the matter promptly and impartially, if you are not satisfied with how your complaint is dealt with, you can elect to refer the matter free of charge to the Australian Financial Complaints Authority. The Australian Financial Complaints Authority (AFCA) can be contacted on 1800 931 678 or www.afca.org.au or email info@afca.org.au or via correspondence to GPO Box 3, Melbourne, Victoria 3001.

4. If your concerns involve your Adviser's conduct, you may wish to raise this with the Financial Planning Association of Australia (FPA). You can write to them at: PO Box 109, Collins Street West, Melbourne, Victoria, 8007 or with the Association of Financial Advisers (AFA). You can write to them at: PO Box Q279, Queen Victoria Building, Sydney, NSW, 1230.

Alternatively, other matters can be referred to the industry regulator, the Australian Securities and Investments Commission (ASIC) on free-call 1300 300 630 or visit their website www.asic.gov.au.

In addition, the Australian Securities and Investment Commission (ASIC) provides guidelines on where and how to make complaints. The information can be accessed through the ASIC website www.asic.gov.au and following the link "Complaining About Companies and People".

Professional Indemnity Insurance

Lets Make Money Pty Ltd has Professional Indemnity Insurance in place to cover us and our representatives for liability arising from the financial services we provide. It meets our requirements as a financial services licensee.

Privacy Policy

1. Overview

The collection of personal information about individuals by organisations is governed by the *Privacy Act 1988* (the Privacy Act) which contains a national scheme for the collection, use, correction, disclosure and transfer of personal information by organisations in the private sector.

Protecting 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 a Privacy Policy (the Policy).

Purpose

This Policy explains Lets Make Money Pty Ltd'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 a set of principles, known as the Australian Privacy Principles (APPs). Those Principles and our approach to those Principles are set out below.

2. Collection

What information do we collect?

We will collect and hold your personal information 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 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 or through 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 are also specific circumstances in which we will ask for your sensitive information 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 need to collect information from third parties. For example, we may need to collect information from 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 information about you, we will inform you of the obligation and the consequences of not giving us the requested 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 the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or delay the processing of your applications or any claims
- affect your eligibility for specified insurance covers
- 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, personal assistance 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 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 will also be used where you have consented to such disclosure or where it is required or authorised under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

4. Disclosure

Who do we give information to?

Where personal information is disclosed there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we often disclose your personal information include:

- any 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 contacted to assist us to process that benefit
- any financial institution who holds an account for you
- any professional advisers appointed by us
- businesses that may have referred you to us (for example, your accountant).

There are situations where we may also disclose your personal information where it is:

- 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 also disclose your information if you give your consent.

Will my information be disclosed overseas?

We do not disclose your personal information overseas.

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 a telephone directory.

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, you should contact us.

6. How clients Opt Out?

LMM conducts very little direct marketing, only sending out one or two newsletters by post to existing clients per year. Each newsletter contains an Opt Out clause asking those 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, addressed to the Privacy Officer, must be in writing in accordance with the Privacy Act 1988.

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 Information Commissioner. You can lodge a written complaint with the Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: www.oaic.gov.au
- Completing a hard copy form which can be obtained at <https://www.oaic.gov.au/individuals/how-do-i-make-a-privacy-complaint> and submitting by –
- post to GPO Box 5218, Sydney NSW 2001
- fax to 02 9284 9666
- email at enquiries@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.

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. Refer to section 9 for our Customer Service contact details.

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 effectiveness of the 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 as required with the most recent version being available online at www.letsmakemoney.com.au

How do I contact the privacy officer?

Should you have a query about Privacy, please contact Paul Goethel on 03 9595 8007.

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: www.letsmakemoney.com.au Email: imm@letsmakemoney.com.au