

## Privacy Policy 1/14

This Policy outlines how Defencewealth manages personal information in accordance with the Information Privacy Principles (IPPs) contained in the *Information Privacy Act 2000* (the Privacy Act). The Policy applies to any personal information provided to Defencewealth Group by an individual, and also to personal information that Defencewealth Group obtains about individuals from other sources.

**Principle 1 - Collection of personal information** Defencewealth Group only collects personal information that it is authorised by law to collect and that is necessary for the performance of its professional functions.

**Principle 2 - Use and disclosure of personal information** Defencewealth Group and its staff are to maintain the confidentiality of personal information relating to our clients and information held on behalf of our clients in the day to day running of our business. This obligation applies to every person who works for and contracts to Defencewealth Group. There are a number of exceptions to this obligation, including divulging or communicating information to:

- The Director of Consumer Affairs;
- The Civil and Administrative Tribunal;
- A member of the Police Force;
- The Staff and legal advisers of the Business Licence Authority; or
- With the consent of the person to whom the information relates - to another person.

In general, Defencewealth Group only uses the personal information it obtains for the purposes of fact-finding and assessing whether property investment would presently suit a Client's personal circumstance. All relevant information gathered is shared and utilised between Defencewealth and its Professional Partners and external service providers to provide the Client with a tailored and holistic property investment advisory service. Defencewealth Group may occasionally be required by Commonwealth law to provide personal information to Commonwealth Government agencies. **Absolutely NO information will be sold, leased, rented or transferred to any other party or commercial entity without the Client's explicit written consent.**

**Principle 3 - Data quality** Defencewealth Group endeavours to ensure that it obtains complete information during the fact-finding process and continues to do so once a Client is registered. Defencewealth Group also endeavours to ensure that the personal information it holds is up to date.

**Principle 4 - Data security** Personal information is stored by Defencewealth Group in hard copy documents, as electronic data, or in Defencewealth Group computer systems. Defencewealth Group endeavours to protect any personal information that it holds from misuse or loss, and to prevent unauthorised access, modification or disclosure. Some of the protective measures employed by Defencewealth Group are:

- Document security arrangements and policies in accordance with *Public Records Act 1973* requirements;
- Security measures for access to Defencewealth Group computer systems;
- Controlling access to Defencewealth Group premises; and

-Confidentiality requirements imposed upon members, employees and contractors of Defencewealth Group.

**Principle 5 - Openness** A person may request information from Defencewealth Group concerning the type of personal information it holds, the purposes for which it is held, and how the personal information is collected, held, used and disclosed. Contact details for Defencewealth Group Privacy Co-ordinator appear at the end of this document.

**Principle 6 - Access to and correction of personal information** Clients and other interested persons may be provided with access to their personal information subject to the Act and Freedom of Information laws allowing for such access. Contact details for Defencewealth Group Privacy Co-ordinator appear at the end of this document. If Defencewealth Group does not provide access, the person requesting access will be advised of the reasons for the refusal and informed of any legal exemptions relied upon.

**Correction** Requests for amendment of any personal information held by Defencewealth Group should be directed to Defencewealth Group Privacy Co-ordinator. Contact details appear at the end of this document.

**Principle 7 - Unique identifiers** If a person becomes a Client they may be assigned an identifier. These numbers are necessary to enable Defencewealth Group to perform its functions.

**Principle 8 - Anonymity** Defencewealth Group will respect the rights of individuals to remain anonymous when making general enquiries.

**Principle 9 - Information crossing borders** Defencewealth Group takes reasonable steps to ensure that individuals' personal privacy is protected when personal information is required to be transferred to another agency or body external to the Defencewealth business operation. Refer to *Principle 2* above on the *Use and Disclosure* of personal information for an outline of how and when Defencewealth Group may lawfully disclose personal information.

**Concerned About Your Privacy? - How to Contact Defencewealth Group** If you have any questions about personal privacy, or wish to access or correct personal information held by Defencewealth Group, contact Defencewealth Group Privacy Co-ordinator. We will try to give you access with as little formality as possible. However, where your request is difficult or time-consuming to answer, or where it involves personal information about other people, we may have to use the freedom of information procedures to process it.

The Privacy Co-ordinator will handle the investigation of any complaint about information privacy. Defencewealth Group will acknowledge written complaints within 5 working days, and will provide a full response within 30 working days of receipt of the complaint. If you are not satisfied with the outcome, you are entitled to complain directly to the Office of the Privacy Commissioner.

**Privacy Co-ordinator:**

**JM NICHOLS – QPIA in charge of Defencewealth Group**  
**PO Box 181 RAAF Edinburgh SA 5111, Australia.**

For general information on privacy laws in Australia, see: [www.privacy.gov.au](http://www.privacy.gov.au)