



**Poynter Hargraves**  
Personalised Wealth

## Privacy Policy

### Introduction

At Poynter Hargraves we recognise that your privacy is very important and we consider this another vital aspect in providing you with the highest level of client service possible. We are able to provide comprehensive financial advice to you by establishing certain personal information from you. This way our advice is entirely appropriate for your needs.

At Poynter Hargraves Financial Consultants Pty Ltd we ensure that we meet the stringent legislative and regulatory requirements as part of The Privacy Amendment (Private Sector) Act, 2000. We ensure that we comply and fully support the National Privacy Principles and the Privacy Policy discloses how the personal information you provide to us, and our representatives, is collected, used, held, disclosed and disseminated.

It's all part of our commitment to provide you with the best.

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>

We encourage you to check our website regularly at [www.poynterhargraves.com.au](http://www.poynterhargraves.com.au) for any updates to our Privacy Policy.

### Your Personal Information

Personal information held by Poynter Hargraves Financial Consultants Pty Ltd may include the following information:

- your name, date of birth, current addresses, telephone/mobile/fax numbers, e-mail address;
- information regarding your dependents and family commitments;
- your occupation, employment history and details of family commitments and social security eligibility;
- your financial needs and objectives;
- your assets and liabilities (current and future), income, expenses;
- your superannuation and insurance details;
- your social security entitlements; and
- your risk profile details.

If you choose not to provide certain personal information or provide incorrect information, the advice and/or recommendations may be inappropriate or inadequate.

### How We Collect Your Personal Information

Poynter Hargraves Financial Consultants Pty Ltd collects personal information in a number of ways, including:

- directly from you, through meetings and discussions with you;
- directly from you, when you provide information through a data collection form;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet; and
- directly from fund managers, superannuation funds, life insurance companies and other product issuers once authorisation has been provided by you.

### How We Use Your Personal Information

First and foremost, your personal information is used to help provide comprehensive and/or limited financial planning services to you.

Occasionally, we make available marketing material that may be of interest to you. (This could include articles and newsletters)

If, at any time, you do not wish to receive this information, just let us know, we will endeavour to meet your request within 2 weeks. We maintain a register for those individuals not wanting direct marketing material.

### Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

### When Do We Disclose Your Personal Information?

The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 and the Anti-Money Laundering and Counter Terrorism Financing Rules Amendment Instrument 2014 (No. 3).

For the purposes set out above, we may disclose your personal information to organisations outside Poynter Hargraves Financial Consultants Pty Ltd. The organisations to which we disclose information may include:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to implement your financial plan/recommendations;
- compliance consultants to ensure that our representatives are meeting our compliance standards;
- Para-planning & Administration outsourcing contractors or temporary staff to handle workloads during peak periods;
- mailing houses;
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers to manage our IT systems;
- government and regulatory authorities and other organisations, as required or authorised by law;
- another authorised representative of Poynter Hargraves Financial Consultants Pty Ltd if necessary;

- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence; and
- a new owner of our business that will require the transfer of your personal information.

In addition, our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Poynter Hargraves Financial Consultants Pty Ltd.

Poynter Hargraves Financial Consultants Pty Ltd takes its obligations to protect your information seriously. We operate throughout Australia and overseas and as part of our operations some uses and disclosures of your information may occur outside your state or territory and/or outside of Australia. In certain circumstances we will obtain your consent before this occurs.

#### Dealing With Us Anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

#### Your Personal Information-Storage & Security

We keep your personal information in your client file. These files are accessible to authorised personnel only and are secured out of hours.

Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Therefore, if you are no longer a client of Poynter Hargraves Financial Consultants Pty Ltd, we will maintain your personal information on or off-site in a secure manner for 7 years. After this, we will ensure it is discreetly destroyed.

Poynter Hargraves Financial Consultants Pty Ltd is constantly striving to provide our clients with exceptional service. If, at some point in the future, you choose to no longer be a client of Poynter Hargraves Financial Consultants Pty Ltd, we would welcome your feedback as to the reasons behind your choice. This feedback is an important mechanism enabling us to evaluate and continually improve our client services. Therefore, upon receiving notification that you no longer wish to be a client of ours, either by yourself or a third party i.e. Fund Manager or Product Provider, a member of our Client Services Team may contact you, as a means to obtain this feedback.

#### Your Accurate Personal Information

Poynter Hargraves Financial Consultants Pty Ltd takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, comprehensive and up-to-date. To make certain we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

#### Your Sensitive Information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade associations, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including:

- the collection is required by law; and
- when the information is necessary for the establishment, exercise or defence of a legal claim.

#### Your Personal Information-Access

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will (subject to certain exceptions) provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information. Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

#### Our Website

Poynter Hargraves Financial Consultants Pty Ltd's website provides links to third party websites. The use of your information by these third party sites is not within the control of Poynter Hargraves Financial Consultants Pty Ltd and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

#### Spam Act

Spam is a generic term used to describe electronic ‘junk mail’- unwanted messages sent to a person’s email account or mobile phone. In Australia, spam is defined as ‘unsolicited commercial electronic messages’.

‘Electronic messaging’ covers emails, instant messaging, SMS and other mobile phone messaging, but does not cover normal voice-to-voice communication by telephone.

Poynter Hargraves Financial Consultants Pty Ltd complies with the provisions of the Spam Act when sending commercial electronic messages.

In all activities when dealing with personal information Poynter Hargraves Financial Consultants Pty Ltd makes sure that our practices are in accordance with the National Privacy Principles. Personal information includes our clients contact details.

#### Communications Consent

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is okay to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

#### Viral Messages-The Law

Poynter Hargraves Financial Consultants Pty Ltd ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have consented to receiving Commercial Communications.

#### Commercial Communication-Age Sensitive Content

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, Poynter Hargraves Financial Consultants Pty Ltd takes reasonable steps to ensure that such content is sent to recipients who are legally entitled to use or participate in the product service or event.

#### Internal Procedure

The three key steps Poynter Hargraves Financial Consultants Pty Ltd follows:

Consent – Only commercial electronic messages are sent with the addressee’s consent – either express or inferred consent.

Identify – Electronic messages will include clear and accurate information about the person and Poynter Hargraves Financial Consultants Pty Ltd that is responsible for sending the commercial electronic message.

Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

#### Complaint Resolution

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 3 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

#### Contact Details

Privacy Officer  
Poynter Hargraves Financial Consultants Pty Ltd  
First Floor, 215 Greenhill Road, Eastwood, SA 5063  
tel 08 8272 0300  
fax 08 8273 0677  
[www.poynterhargraves.com.au](http://www.poynterhargraves.com.au)

Australian Financial Services Licensee  
License Number: 237846  
ABN: 13 077 155 143