



FINANCIAL SERVICES PRIVACY STATEMENT AND POLICY

December 2016

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RSM Financial Services Australia Pty Ltd AFSL No 238282



FINANCIAL SERVICES

We understand that a variety of factors come into play when it comes to realising your personal wealth objectives. Regardless of the stage of your life, you need advice that is sound, practical and relevant to your personal circumstances at that point in time.

Our financial planning consultants advise, plan and manage the affairs of thousands of Australians including individuals, SMEs and large institutions. We are passionate about working closely with you so we can understand your goals and aspirations. This deep understanding allows us to anticipate changes in financial demands and take advantage of new opportunities with a financial pathway constantly tailored to your needs.

FOR FURTHER INFORMATION CONTACT:

Financial Services Privacy Officer
GPO Box R1253, Perth, WA 6844
+61 8 9261 9100

PRIVACY STATEMENT

RSM Financial Services Australia Pty Ltd (ABN 22 009 176 354, AFSL 238 282) (RSM) is committed to the Australian Privacy Principles (APP) as set out in the Privacy Act 1988 (amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2012).

To comply with our obligations under the APP, we have a Privacy Policy which sets out how we manage privacy in our firm.

You are welcome to request more information about the policy.

1. PRIVACY POLICY

For the attention of individuals whose personal information may be collected by this firm.

1.1. Purpose of the policy

RSM takes its obligations under the Privacy Act seriously and takes reasonable steps in order to comply with the Act and protect the privacy of the personal information that we hold. This policy sets out how we intend to do so.

1.2. The personal information that the firm collects

RSM collects and holds the following personal information:

- Your name
- Date of birth
- Address
- Tax file number
- Details of your personal and financial affairs, needs and objectives, as provided by you to allow for the provision of personal financial advice

If it is reasonably necessary in the circumstances, we may also collect sensitive information (which is a type of personal information) such as a person's medical history or medical health checks, membership of a professional organisation or criminal record.

1.3. Why we collect it

The purpose of collecting personal information is to allow RSM to comply with Australian financial services laws and to fulfil our contractual

agreement with you, namely to provide financial advice and financial reports as your advisers. This information is only obtained from you when you voluntarily provide it to us.

RSM, understands the importance of maintaining the confidentiality of our client information, to maintain our reputation as a professional firm of the highest integrity, any information provided by you is treated in strict confidence and shall remain confidential.

In addition to the primary purpose of collection identified above, the information may be used for a secondary purpose such as being provided to RSM or related entities to allow them to inform you about other financial services that may suit your needs.

No information collected in relation to the above will be disclosed to any third party without your prior approval.

1.4. Access to your personal information

RSM will provide you with access to the personal information that we hold about you. Access will be provided in accordance with our part 3 of this Policy. If you require access to your personal information please contact the adviser responsible for handling your affairs.

1.5. Complaints

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed, please contact the adviser responsible for handling your affairs. Complaints will be handled in accordance with part 4 of this Policy.

1.6. Storage

We will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

1.7. Third Parties

We contract out some data storage, financial and compliance auditing services. We take measures to protect the information by requiring our contractors to work within the framework of the Privacy Act.

It may also be necessary to disclose your personal information to a party acquiring an interest or shareholding in RSM.

RSM will not typically provide your personal information to overseas parties. We will only disclose your personal information to overseas parties, if you have expressly request that we do so, or unless we have taken reasonable steps to ensure that the overseas party will handle the information in accordance with Australian Privacy Laws.

2. COLLECTION STATEMENT

The personal information collected is collected by RSM.

2.1. Use and disclosure

Personal information is collected for the purpose of preparing financial advice and financial reports as your advisers.

2.2. Legal reasons why we collect the personal information

We collect the information in order to comply with our legal obligations under Australian financial services law and the contractual arrangements we have with you.

2.3. What happens if you choose not to provide the information?

You are not obliged to give us your personal information. However, if you choose not to provide RSM with the required personal information, we may be unable to provide you with the service requested or provide appropriate financial advice.

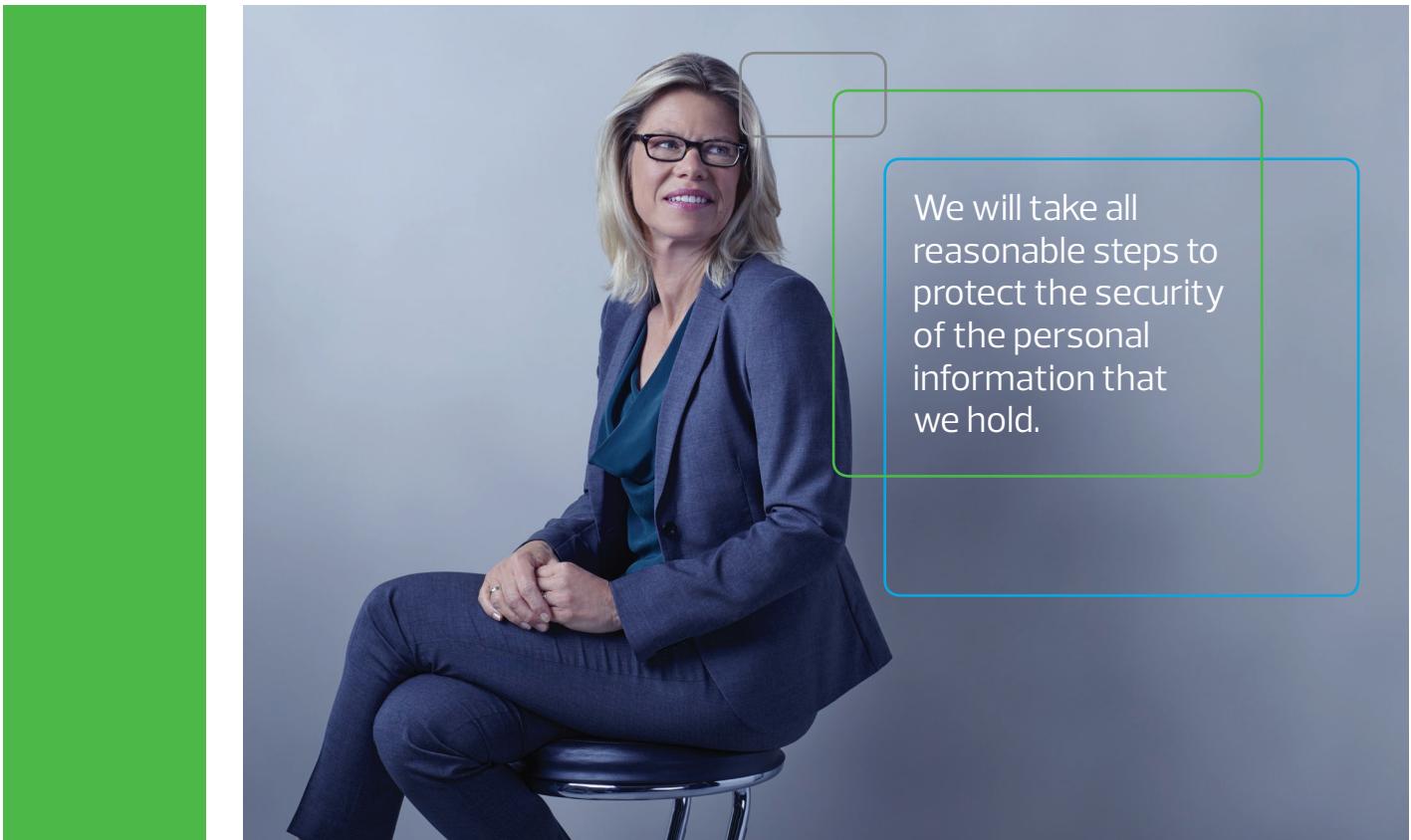
2.4. Sources of information

Where possible, RSM will collect the information directly from you. In some cases, RSM may collect information directly from a third party, RSM will only collect information in this manner with your expressed written consent.

2.5. Correction

RSM will in accordance with Australian financial services law take reasonable steps to ensure that your personal information is accurate and up to date. If you believe the personal information RSM holds about you is inaccurate or out of date, you may request that RSM corrects this information by notifying your adviser.

You may request that RSM notify certain third parties of changes to your personal information.



3. ACCESS TO YOUR INFORMATION

3.1. Purpose

The purpose of this Policy is to set out how RSM will provide access to your personal information. The Access Policy is part of our Privacy Policy.

3.2. Form of Access

RSM will provide access by allowing you to inspect, take notes of or receive copies of the personal information RSM holds about you. You can make your request by contacting your adviser.

To obtain access you will have to provide proof of your identity, this is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

3.3. When will access be denied?

Where possible, RSM will favour providing access. Access will be denied if:

- providing access would pose a serious and imminent threat to life or health of a person
- providing access would create an unreasonable impact on the privacy of others

- the request is frivolous and vexatious
- the request relates to existing or anticipated legal proceedings and the information would not be accessible by the process of discovery in those proceedings
- providing access would prejudice negotiations with the individual making the request
- access would be unlawful
- denial of access is authorised or required by Australian laws, or a court order
- access would prejudice law enforcement activities
- access discloses a 'commercially sensitive' decision making process or information
- RSM reasonably suspects that the request is unlawful and giving access would prejudice RSM in taking action on the matter
- any other reason that is provided for in the APP's set out under the Privacy Act

Where there is a complaint about the right or forms of access, these will be dealt with in accordance with part 4 of this policy.

3.4. Time

We will take all reasonable steps to provide access within 30 days of your request.

3.5. Costs and Charges

RSM reserves the right to impose reasonable charges in relation to the following:

- Photocopying;
- Delivery cost of information stored off-site – where information is stored off-site, the cost of obtaining access to the information
- Access to electronic databases
- Postage

4. PRIVACY COMPLAINTS

How we handle privacy complaints (for individual clients)

4.1. Who may complain under this policy?

If you have provided us with personal information you have a right to make a complaint, have it investigated and dealt with under this policy.

4.2. What is a privacy complaint?

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to your personal information. This could include matters such as:

- How personal information is collected
- How personal information is stored
- How this information is used or disclosed
- How access is provided
- Any other matter covered by this policy

4.3. If you have a complaint about privacy practices?

If you have questions or concerns in relation to RSM's handling of your personal information you should in the first instance raise the matter with your adviser. If the matter is not resolved to your satisfaction you may make a complaint to the RSM Privacy Officer using the details outlined below.

4.4. How RSM manage complaint

RSM will seek to resolve your complaint within a reasonable timeframe (30 days or as soon as practicable). At all times RSM will seek to manage your complaint in accordance with following principles:

- All complaints will be treated seriously
- All complaints will be dealt with promptly
- All complaints will be dealt with in a confidential manner
- The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between this firm and you

4.5. The Office of the Australian Information Commissioner

If you are unhappy with RSM's response to your complaint, you are entitled to take your complaint formally to The Office of the Australian Information Commissioner.

The Office of the Australian Information Commissioner can be contacted on 1300 363 992. Further details can be found online at www.oaic.gov.au.

4.6. Anonymity

You are entitled to lodge an anonymous complaint or to use a pseudonym when lodging a complaint with RSM. In the event that an anonymous complaint is received, RSM will note the issues raised and try and resolve the complaint appropriately. However RSM may be unable to deal with an anonymous complaint if we are unable to investigate appropriately or follow up such complaints.

4.7. Contacting the RSM Privacy Officer

RSM Privacy Officer
RSM Financial Services Australia Pty Ltd
GPO Box R1253
Perth WA 6844
T 0 8 9261 9100

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RSM Financial Services Australia Pty Ltd is a member of the RSM network
and trades as RSM. RSM is the trading name used by the members of the
RSM network.

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