

# PRIVACY POLICY

**RSM Financial Services Australia Pty Ltd**  
**Australian Financial Services License (238 282)**

## 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.

### 1.1. 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.

### 1.2. 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.

### 1.3. 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.

### 1.4. 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.

### 1.5. 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.

### 1.6. 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 may release your information to Government or regulatory bodies as required or authorised by law.

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 requested 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.

### 1.7. Our Website

Individuals do not have to reveal their identity to use our website. However if a person remains anonymous or goes by a pseudonym, we may be unable to efficiently respond to your request.

Cookies may be used in some areas of the website to improve the navigation use by visitors. If you are concerned about cookies, most browsers recognise when cookies are being offered and allow users to opt-out. If you do you will still be able to navigate our website.

Our website contains links to third party websites which a user can access if they wish. By accessing these links you will be subject to the third parties privacy policy and not that of RSM. RSM is not responsible for the privacy policy or practices of those websites and for any consequences of your use of those websites.

Further information in relation to your privacy on our website can be found at [www.rsm.com.au](http://www.rsm.com.au)

## **2. Collection Statement**

The personal information collected is collected by RSM.

### **2.1. Use and disclosure - General**

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

### **2.2. Use and disclosure - 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 Use and disclosure - Marketing**

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 Australia or its related entities to allow them to inform you about other financial services that may suit your needs.

### **2.4. 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.

## **2.5. 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.

## **2.6. 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 law, 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. Notifying you of data breaches

A data breach occurs when personal information held by us is lost or subjected to unauthorised access or disclosure. If we suspect or know of a data breach, we will take immediate steps to limit any further access or distribution of the affected personal information or the possible compromise of other information. When we have reasonable grounds to believe that a data breach is likely to result in serious harm – for example identity theft, significant financial loss or threats to physical safety we will notify individuals at likely risk as soon as practicable and make recommendations about the steps they should take in response to the data

breach. We will also notify the Office of the Australian Information Commissioner.

Notifications will be made using our usual method of communicating with you such as by a telephone call, email, SMS, physical mail, social media post, or in-person conversation.

## 5. Complaints

How we handle privacy complaints

### 5.1. 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.

### 5.2. 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

### 5.3 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.

### 5.4. How RSM manage complaints

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

### **5.5. 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](http://www.oaic.gov.au).

### **5.6. 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.

### **5.7. Contacting the RSM Privacy Officer**

RSM Privacy Officer and Data Controller  
RSM Financial Services Australia Pty Ltd  
GPO Box R1253  
Perth WA 6844  
T 61 8 9261 9100

## **6. European Residents**

If you are a resident of the European Union, you have the following data protection rights, which you can exercise at any time by contacting the Privacy Officer and Controller listed above.

- The right to opt-out of marketing communications we send you at any time.
- The right to access, correct, update or request deletion of your Personal Data.

Where you request that we delete your personal data, this will be done in accordance with Australian Laws. For example we are required to hold some personal data for a period of seven (7) years.

- The right to object to or restrict the processing of your personal information in certain circumstances, except for when processing is required for legal reasons.
- You may revoke your consent for us to process your personal information. In some cases we may continue to process your data when processing is required for legal reasons.
- You have a right to complain to your local supervisory authority should you feel our processing of your data infringes your European Regulation.