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# LIFESPAN PRIVACY POLICY

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MAY 2004

## OUR COMMITMENT

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At Lifespan Financial Planning we recognise that your privacy is very important. Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000.

Our Privacy Policy sets out our commitment to those principles. We require all our staff (including our Authorised Representatives) to adopt our Privacy Policy.

A summary of the National Privacy Principles is available by contacting our office.

## COLLECTION

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As a provider of financial services we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- (a) employment details and employment history
- (b) details of your financial needs and objectives
- (c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation
- (d) details of your investment preferences and aversion or tolerance to risk
- (e) information about your employment history, employment circumstances, family commitments and social security eligibility and
- (f) health information (required for some types of insurance)

We are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Planning Association of Australia (FPA) to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

Generally, collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. Additional and/or updated personal information may be collected through one or more of those methods as required.

## **USE AND DISCLOSURE**

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We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial plan
- the provision of financial planning advice to you
- making securities and investment recommendations
- reviewing your financial plan
- reviewing securities and investment recommendations
- risk management

We will not use or disclose Personal Information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body

We are required under the Rules of Professional Conduct of the FPA to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission (ASIC).

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be mishandled or disclosed by them. In the event that a sale of our business takes place, all clients will be advised of the transfer of their personal information to the purchaser of the business.

## **DOCUMENT SECURITY AND STORAGE**

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Your personal information is maintained securely and is generally held in your client file. Information may also be held in a computer database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

## **ACCESS AND CORRECTION**

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You may at any time, request access to your personal information by contacting your adviser (our Authorised Representative) or Privacy Officer. We will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your personal information if:

- (a) providing access would pose a serious threat to the life or health of a person
- (b) providing access would have an unreasonable impact on the privacy of others
- (c) the request for access is frivolous or vexatious
- (d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- (e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- (f) providing access would be unlawful
- (g) denying access is required or authorised by or under law
- (h) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security

In the event we refuse access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness and we will, if we agree that the information requires correcting, take all reasonable steps to amend the information.

We will endeavour to respond to any request for document access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

## **IDENTIFIERS**

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Generally, we will not adopt, use or disclose an identifier (eg, TFNs, Medicare numbers, etc) that has been assigned by a government agency and may be provided by you.

## **INFORMATION COLLECTED ONLINE**

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Lifespan's web site may contain links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.

## **PRIVACY COMPLAINTS**

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This Privacy Policy and the legislation which governs it has been established to promote and protect your privacy rights. If you believe your personal information has been mishandled or there has been a breach of privacy, you may lodge a complaint directly with our Privacy Officer by contacting us on the details below. Your complaint will be thoroughly investigated and responded to within 5 working days. We endeavour to satisfactorily resolve all complaints and encourage our clients to resolve complaints directly with our organisation, however, if you are unhappy with our response, you are entitled to escalate your complaint to the Office of the Privacy Commissioner.

## **CHANGES TO THIS PRIVACY POLICY**

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We reserve the right to review and amend this Privacy Policy in accordance with legislative changes and our business requirements.

## **CONTACT US**

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If you have any further enquiries regarding privacy issues or require further information relating to our Privacy Policy, please contact our Privacy Officer, Julien Kanagatnam.

Level 1, 20 Loftus Street, Sydney 2000  
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Telephone: (02) 9252 2000  
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Email: [julien@lifespanfp.com.au](mailto:julien@lifespanfp.com.au)

## **ADDITIONAL PRIVACY INFORMATION**

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