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PRIVACY POLICY

What kinds of personal information is collected and held?

PPN Wealth Pty Ltd (**PPN Wealth**) is required to collect and hold personal information in order to provide its services to our investors (**clients**). Generally, the kinds of personal information we collect includes:

- your name, home address, email address, telephone number and date of birth
- other identification verification information, including photographic information from documents including your birth certificate, passport; driver's licence, pension card, citizenship certificate, tax notice assessment, Medicare card and utilities notices
- financial information about your sources of wealth and purpose of investment; and
- tax information including your tax file number (**TFN**)

When recruiting employees or appointing contractors may collect and hold personal information such as: the individual's name, contact details, date of birth, citizenship, employment references, civil credit and criminal records, regulatory accreditation (such as RG 146 accreditation for advisers) and driver's licence information, education and employment history. Once appointed we will also collect and hold TFNs, financial information relating to the appointing and banking details for payments.

How is it collected?

For our clients, personal information is mainly collected through the meetings with you to be able to provide you with appropriate financial advice and in application forms for financial products that are recommended to you. In addition, personal information may be provided to us via meetings, telephone, email, correspondence or through our website.

Why we collect, hold, use and disclose client's personal information?

PPN Wealth collects, holds, uses and discloses clients' personal information for the purposes of:

- providing financial products or services; and
- complying with our regulatory or legal requirements, including:
 - the *Anti-Money Laundering & Counter-Terrorism Act 2006*
 - the *Corporations Act 2001*
 - the *Australian Securities and Investments Commission Act 2001*
 - the *Bankruptcy Act 1966*
 - the *Tax Laws Amendment (Implementation of the FATCA Agreement) Act 2014*
 - the *Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016*; and
 - applicable taxation law.

How is it held?

We respect the personal information you have entrusted to us and we have a responsibility to manage and protect that information.

Your personal information will be stored in a secure environment in hard copy, electronically or both. With the exceptions detailed within this policy, your information will only be available to employees of or our service providers on a need-to-know basis in order to perform their obligations and duties

What happens if personal information security is breached?

We implement corrective plans if our security measures are breached or your personal information is lost or inadvertently accessed by an unauthorised person. You and the Privacy Commissioner will be advised if we assess the data breach is likely to cause you serious harm.

How do you access your personal information and seek correction of it?

Should you wish to know what personal information holds on you, you may request to view this information by contacting our Privacy Officer as follows:

Privacy Officer
Level 9, 454 Collins Street, Melbourne Vic 3000
Telephone: 03 8679 4155
Email : alistairp@ppnwealth.com

The Privacy Officer will promptly investigate your privacy enquiry and provide you with appropriate answers where required. Should you discover that any information is outdated, incorrect or incomplete you may request to have the personal information corrected and will promptly update our records. You may also contact the Privacy Officer if you have any questions on our compliance with the *Privacy Act 1988 (Cth)*.

How can I complain about a breach of my privacy?

If you wish to make a complaint about our handling of your personal information you should contact the Privacy Officer as referred to above. If we cannot resolve your complaint, then you may raise your issue with the Office of the Australian Information Commissioner.

All privacy breaches that have resulted in or are likely to result in serious harm to any individual affected are 'eligible data breaches' which must be reported by to the Office of the Australian Information Commissioner.

To whom might your private information be disclosed?

Generally, will only disclose your personal information for the purposes of providing our financial products or services to you. This may include disclosing your personal information to related entities of and third parties where necessary to provide you with our financial products or services. These third parties may include government departments and regulatory authorities. They may also include our auditors, insurers, custodians, IT providers and third party administrators (**service providers**).

Personal information is not disclosed to overseas persons. If this should no longer be the case, to provide our financial products and/or services to you then, before disclosing any personal information to an overseas recipient will take reasonable steps to ensure the overseas recipient complies with the Australian Privacy Principles (**AAPs**) or is bound by a substantially similar privacy

regime or you otherwise consent to the overseas disclosure or the disclosure is required or authorised by law.

Is sensitive personal information collected?

To be able to provide appropriate financial advice to you, we may collect sensitive personal information on clients. Sensitive personal information is information about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, biometric information or biometric templates. This information may need to be provided to product provider on behalf of yourself. An example is seeking to obtain appropriate personal risk cover.

Notifiable Data Breaches

PPN Wealth is required to notify individuals and the Office of the Australian Information Commissioner about 'eligible data breaches'. An eligible data breach occurs when the following criteria are met:

- there is unauthorised access to, or disclosure of personal information held by us (or information is lost in circumstances where unauthorised access or disclosure is likely to occur).
- this is likely to result in serious harm to any of the individuals to whom the information relates.
- we have been unable to prevent the likely risk of serious harm with remedial action.

We will conduct an assessment if it is not clear if a suspected data breach meets these criteria. The assessment will determine whether the breach is an 'eligible data breach' that triggers notification obligations.

Additional Information

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner (**OAIC**) at: <http://www.oaic.gov.au/>. We regularly review the OAIC website to keep informed of issues and developments in privacy law and changing legal obligations.