

## Privacy Policy

Northhaven Private Wealth Pty Ltd are committed to protecting the privacy of your personal information. Below is some information about how your personal information will be handled.

### Collecting your personal information

As stated in the Financial Services Guide, Northhaven Private Wealth Pty Ltd collects your personal information. This is done for the purpose of your financial adviser providing you with the financial services that you have requested. Your financial adviser is required under the Corporations Act 2001, Insurance (Agents and Brokers) Act 1984, certain policies issued by the Australian Securities and Investments Commission and its predecessors, Financial Transactions Reports Act 1988 and taxation laws to collect information about you when providing the financial advice that you have requested. We also collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. If the personal information requested for the provision of the financial advice requested is not provided, your financial adviser may not be able to provide the financial advice you have requested, or will not be able to provide you with financial advice that is appropriate to your investment needs, objectives and financial circumstances. It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed. (You can deal with us anonymously where it is lawful and practicable to do so for example, if you telephone requesting our postal address).

Northhaven Private Wealth Pty Ltd collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- 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
- directly from fund managers, superannuation funds, life insurance companies and other product issuers once authorization has been provided by you.

*You have a right to refuse us authorisation to collect information from a third party.*

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we'll destroy or de-identify that personal information as soon as practicable.

The Privacy Amendment (Enhancing Privacy Protection) Act sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

### Using and disclosing your personal information

Your personal information may be disclosed for purposes related to the provision to you of the financial advice you have requested. The types of service providers that may be provided with your personal information are:

- Other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;

- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- Organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- Your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- Government authorities and other organisations when required by law; and Organisations that you have consented to your personal information being disclosed to.
- In certain circumstances we are required to collect government identifiers such as your tax file number, we do not use or disclose this information other than when required by law or unless you have voluntarily consented to disclose this information to any third party.

Northhaven takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and current. To ensure 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
- Update us with any changes to your personal information as soon as possible.

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately 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. Other measures taken are:

- Confidentiality requirements for our employees
- Security measures for systems access
- Providing a discreet environment for confidential discussions

If you wish to make a complaint about any breach or potential breach of your privacy rights, please contact our Privacy Officer. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

## **Gaining access to your personal information and contacting us**

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 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
- Providing you with a summary

Some exceptions exist where we will not provide you with access to your personal information if:

- Providing access would pose a serious threat to the life or health of a person
- Providing access would have an unreasonable impact on the privacy of others
- The request for access is frivolous or vexatious
- The information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings

- Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- Providing access would be unlawful
- Denying access is required or authorised by or under law
- 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.

If you provide inaccurate or incomplete information we may not be able to provide you with the products of services you are seeking. Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

## **Consent**

From time to time Northhaven may send you direct marketing material. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavor to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

In the event that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence, and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

Northhaven takes its obligations to protect your information seriously, this includes when we operate remotely. Some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

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 association, 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. Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

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. We encourage you to check our website regularly for any updates to our Privacy Policy.

## **Contacting Us**

To obtain more information about how we manage your personal information, or if you would like a copy of our Privacy Policy or a form requesting access, please contact us.

Tel: (02) 9877 0505

Email: [premium@northhaven.com.au](mailto:premium@northhaven.com.au)

**[www.northhavenprivatewealth.com.au](http://www.northhavenprivatewealth.com.au)**