

## Privacy Policy

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This Privacy Policy sets out the information handling policies of Accord Financial Solutions Pty Ltd, an Australian Financial Services Licensee (No. 323379).

At Accord Financial Solutions Pty Ltd (Accord), we are committed to providing professional services and respecting the privacy of your personal information. Accord is bound by the Australian Privacy Principles under the Privacy Act. This policy explains how Accord will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

The Privacy Amendment (Enhancing Privacy Protection) Act, 2012 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 Federal Privacy Commissioner at <http://www.privacy.gov.au>.

As a financial services organisation we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including s961B of the Corporations Act.

### What type of information does Accord Financial Solutions Pty Ltd hold?

The type of information we collect and hold about you varies depending on the type of product or service you require. Accord will hold different information about you if you have a life insurance policy than if you have a managed investment. Your personal information may include:

- Your name, address and contact details
- Your date of birth, age and retirement plan; and,
- Your financial needs, objectives and circumstances.

We may need health information from you to provide you with personal risk insurance advice, but not necessarily for investment products.

**In most circumstances, the information that we hold about you will be provided by you or a 3<sup>rd</sup> party under your authority. You have a right to refuse us authorisation to collect information from a third party.**

You may choose not to provide us with your personal information. Depending on the nature and quality of the information you choose to withhold, we may not be able to provide you with advice or implement strategies entirely appropriate to your financial needs and objectives.

As a financial service provider, we have an obligation under the Anti Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as passports, birth certificates, marriage and driver's licences. We will retain copies of this information. We assure you that this information will be held securely.

### How does Accord Financial Solutions Pty Ltd store our documents securely?

Your personal information is maintained securely and is generally held in your client file. Information may 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.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained for a period of 7 years in order to comply with legislative and professional requirement, following which time the information will be destroyed.

## How does Accord Financial Solutions Pty Ltd use this information?

We use this information to provide you with products or services, to assess your risk tolerance and determine strategies and recommendations consistent with your financial needs, objectives and personal circumstances.

At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

We may use your personal information to provide you with advice, pricing and services on the following products:

- life insurance products, such as insurance for your life, permanent disability and income replacement;
- investment products and services such as managed investment funds and investor directed portfolio services;
- superannuation products, such as superannuation funds, investments for superannuation funds and investment insurance policies; and
- Financial advice and services.

We may use the information to send you material about other products or services. If you do not want to receive this type of material, tell us and we will stop. We maintain a register for those individuals not wanting direct marketing material. Our contact details are set out below.

## Will Accord disclose your personal information?

Accord may share information with organisations that assist us to administer your investments and insurance policies or provide you with products and services including our internal and external service providers such as administrators, financial institutions, fund managers, compliance auditors, and insurance companies, Tax Practitioners Board (TPB), Association of Financial Advisers (AFA) and the Financial Planning Association (FPA). These providers are not permitted to use your information for any purpose other than the specific purpose it was provided.

There are circumstances under which Accord may disclose your personal information such as:

- when the disclosure is required by law (for example, disclosed to the Australian Taxation Office or ASIC or Centrelink); or
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests).

Accord may outsource some of the processes involved in providing financial services. Those entities may require access to a client's personal information to carry out those processes on our behalf. Examples of the processes are compliance assessments, software programmers or data storage. Some of these entities may reside overseas. If that country does not have the same requirements as Australia we will require an undertaking from the entity that it will comply with the Australian Privacy Principles.

We will disclose your personal information if you give your consent for us to do so.

**We do not sell mailing lists.**

## How does Accord Financial Solutions Pty Ltd handle a request for access to personal information?

Under the Australian Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can, we will answer your question immediately.

We will try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will, if practicable, give you that information over the telephone. We will generally respond to a written request in writing. Sometimes, we will ask that you put your request in writing, for example, where you want copies of material or access to older information or files which are not current or it is necessary for us to retain a record of your request. We may ask you to identify yourself to our satisfaction.

We will not charge a fee for making a request to access your personal information however we may charge a fee for accessing your personal information. If a fee is applicable, we will disclose this to you prior to providing you with the information. There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the Australian Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

## What if some of the information Accord Financial Solutions Pty Ltd holds is wrong?

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it on request, (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on your file.

## Website

Accord compliance with the Australian Privacy principles applies to your access to our website. Our privacy policy may be accessed from the website and other information is posted there for your convenience.

Some areas of our website require you to be a client of Accord and you will be issued with a user name and password which are strictly for your personal use only. Accord will not be liable for any acts that arise from the use of your user name and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify Accord immediately if you become aware of a breach of your security.

Our website uses cookies which allows us to identify your browser while you are using our site. Whilst cookies do not identify you, they allow us to track usage patterns. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

## How do I make further enquiries or complain about a breach of privacy?

If you require more information about the way Accord manages personal information or wish to make a complaint about a breach of your privacy, you should contact us at:

Accord Financial Solutions Pty Ltd  
Suite 3, Ground Floor, 206 Greenhill Road, EASTWOOD SA 5063  
PO Box 2145 Kent Town SA 5071  
Phone: (08) 8271 2688  
Email: [services@accordfs.com.au](mailto:services@accordfs.com.au)

## Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time. We encourage you to check our website regularly for any updates to our Privacy Policy.

## Additional Privacy Information

Further information on privacy in Australia may be obtained by visiting the Web site of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au>