

# Privacy Policy



## Who are we?

'We', 'us' and 'our' or SMSF refer to MyPlanner Australia AFSL 345905 (ACN 140 520 225) as a licensee authorised to carry on a financial services business and our related body corporates.

## Our commitment to protect your privacy

We understand how important it is to protect your personal information. This document sets out our privacy policy commitment in respect of personal information we hold about you and what we do with that information.

We recognise that any personal information we collect about you will only be used for the purposes we have collected it for or as allowed under the law. It is important to us that you are confident that any personal information we hold about you will be treated in a way which ensures protection of your personal information.

Our commitment in respect of personal information is to abide by the Australian Privacy Principles for the protection of personal information, as set out in the Privacy Act (1988) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (collectively referred to as the Privacy Act) and any other relevant law.

## Personal information

When we refer to **personal information** we mean information from which your identity is reasonably apparent. This information may include information or an opinion about you. The personal information we hold about you may also include credit information.

**AML information** is information which is used to assess whether your investment in any way breaches the terms and conditions of Anti- Money Laundering and Counter Terrorism Financing Act (2006) currently prevailing in Australia.

The kinds of personal information we may collect about you include your name, date of birth, address, account details, occupation, tax file number (TFN) and any other information we made need to identify you.

## Why we collect your personal information

We collect personal information for the purposes of assessing your application to become a member in our Fund and manage and administer those financial products. We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time we may offer you other products and services.

To enable us to maintain a successful business relationship with you, we may disclose your personal information to other organisations that provide products or services used or marketed by us. The types of organisations to which we are likely to disclose information about you include other fund managers, bankers, accountants, credit reporting bodies, product issuers, investment managers and lawyers. We may also disclose your personal information to any other organisation that may have or is considering having an interest in your investment, or in our business.

## How do we collect your personal information?

Where reasonable and practical we will collect your personal information directly from you. We also collect your personal information from people such as accountants and lawyers.

## Do we disclose your personal information?

Depending on the product or service you have requested, we may disclose your personal information to:

- your financial planner or authorised representative in relation to your finance investments;
- other organisations that are involved in managing or administering your finance such as third party suppliers, printing and postal services, call centres;
- associated businesses that may want to market products to you;
- companies that provide information and infrastructure systems to us;
- anybody who represents you, such as your financial planner, lawyers, and accountants;
- anyone, where you have provided us consent;
- where we are required to do so by law, such as under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth); or
- an organisation providing verification of your identity, including on-line verification of your identity
- data aggregators who collate and report information between us and our business partners and /or you.
- our authorised representatives when it is commercially prudent to do so;
- financial institutions including stockbrokers, custodians, fund managers and portfolio service providers and other entity that administer your financial products;
- insurers, if you obtain insurance through us; or
- your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that:

- A. the person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
- B. you have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located inside or outside Australia.

## Direct marketing

From time to time we may use your personal information to provide you with current information about finance, offers you may find of interest, changes to our organisation, or new products or services being offered by us or any company we are associated with.

If you do not wish to receive marketing information, you may at any time decline to receive such information by telephoning us on (07) 3363 1200 or by writing to us at either [reception@Mardell.com.au](mailto:reception@Mardell.com.au) or PO Box 1476 Kenmore QLD 4069. If the direct marketing is by email you may also use the unsubscribe function. We will not charge you for giving effect to your request and will take all reasonable steps to meet your request at the earliest possible opportunity.

## Updating your personal information

It is important to us that the personal information we hold about you is accurate and up to date. During the course of our relationship with you we may ask you to inform us if any of your personal information has changed.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

## Access and correction to your personal information

We will provide you with access to the personal information we hold about you. You may request access to any of the personal information we hold about you at any time. We may charge a fee for our costs of retrieving and supplying the information to you.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious.

An explanation will be provided to you, if we deny you access to the personal information we hold about you.

If any of the personal information we hold about you is incorrect, inaccurate or out of date you may request that we correct the information. If appropriate we will correct the personal information at the time of the request, otherwise, we will provide an initial response to you within seven days of receiving your request. Where reasonable, and after our investigation, we will provide you with details about whether we have corrected the personal or credit information within 30 days.

If we refuse to correct personal information we will provide you with our reasons for not correcting the information.

## Using government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

## Business without identifying you

In most circumstances it will be necessary for us to identify you in order to successfully do business with you, however, where it is lawful and practicable to do so, we will offer you the opportunity of doing business with us without providing us with personal information, for example, if you make general inquiries about current promotional offers.

## Sensitive information

We will only collect sensitive information about you with your consent. Sensitive information is personal information that includes information relating to your racial or ethnic origin, political persuasion, memberships in trade or professional association or trade unions, sexual preferences, criminal record, or health.

## How safe and secure is your personal information that we hold?

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form. We will also take reasonable steps to protect any personal information from misuse, loss and unauthorised access, modification or disclosure.

## Complaints

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act and the Credit Reporting Code, you may contact our complaints officer on (07) 5510 4804 or by writing to us at either:

Email: [compliance@myplannerls.com.au](mailto:compliance@myplannerls.com.au) or  
Complaints Handling Manager  
Level 3, 26 Marine Parade, Southport, Queensland 4215

We will acknowledge your complaint within seven days. We will provide you with a decision on your complaint within 30 days.

If you are dissatisfied with the response of our complaints officer you may make a complaint to our External Dispute Resolution Scheme, Financial Ombudsman Service Limited which can be contacted on either:

Ph: 1300780808 or  
GPO box 3 Melbourne Victoria 3001 or

Privacy Commissioner who can be contacted on either [www.oaic.gov.au](http://www.oaic.gov.au) or 1300 363 992.

## Further information

You may request further information about the way we manage your personal information by contacting us.

## Australian privacy principles

The Privacy Act includes 13 privacy principles that regulate the handling of personal information. We have adopted these privacy principles in full. A summary table of the privacy principle and what we do to manage your information is outlined in the following table.

<b>APP 1 — Open and transparent management of personal information</b>	SMSF manage personal information in an open and transparent way. This includes having a clearly expressed and up to date APP privacy policy.
<b>APP 2 — Anonymity and pseudonymity</b>	SMSF will give individuals the option of not identifying themselves, or of using a pseudonym. Limited exceptions apply
<b>APP 3 — Collection of solicited personal information</b>	Outlines when SMSF can collect personal information that is solicited. It applies higher standards to the collection of 'sensitive' information.
<b>APP 4 — Dealing with unsolicited personal information</b>	We have adopted a policy to ensure how SMSF must deal with unsolicited personal information
<b>APP 5 — Notification of the collection of personal information</b>	Outlines when and in what circumstances SMSF collects personal information and when we must notify an individual of certain matters.
<b>APP 6 — Use or disclosure of personal information</b>	Outlines the circumstances in which SMSF may use or disclose personal information that it holds.
<b>APP 7 — Direct marketing</b>	We will only use or disclose personal information for direct marketing purposes if certain conditions are met.
<b>APP 8 — Cross-border disclosure of personal information</b>	SMSF will take care to protect personal information before it is disclosed overseas

<b>APP 9 — Adoption, use or disclosure of government related identifiers</b>	SMSF will in limited circumstances adopt a government related identifier of an individual as its own identifier, or use or disclose a government related identifier of an individual.
<b>APP 10 — Quality of personal information</b>	SMSF will take reasonable steps to ensure the personal information it collects is accurate, up to date and complete. We will also take reasonable steps to ensure the personal information we use or discloses is accurate, up to date, complete and relevant, having regard to the purpose of the use or disclosure.
<b>APP 11 — Security of personal information</b>	SMSF must take reasonable steps to protect personal information it holds from misuse, interference and loss, and from unauthorised access, modification or disclosure. SMSF has obligations to destroy or de-identify personal information in certain circumstances.
<b>APP 12 — Access to personal information</b>	SMSF understands its obligations when an individual requests to be given access to personal information held about them by us.
	This includes a requirement to provide access unless a specific exception applies.
<b>APP 13 — Correction of personal information</b>	SMSF understands its obligations in relation to correcting the personal information it holds about individuals

## Change in our privacy policy

We are constantly reviewing all of our policies and attempt to keep up to date with market expectations. Technology is constantly changing, as is the law and market place practices.

As a consequence we may change this privacy policy from time to time or as the need arises. You may request this privacy policy in an alternative form.

This Privacy Policy came into existence on **12 March 2014**

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