

Privacy Policy

BACKGROUND

This Privacy Policy is an important document and outlines our policy on managing the personal information that we collect about individuals including customers and potential customers.

This Privacy Policy is for clients of Adams + Associates Financial Planners Pty Ltd ABN 28 093 569 941, Email: mail@adamsassoc.com.au. This Privacy Policy describes our policies and practices in relation to how we can collect, use, store and disclose your personal information.

COLLECTION AND STORAGE OF PERSONAL INFORMATION

By 'personal information', we mean any details about you, from which your identity is apparent or can be uncovered. At times it may be necessary for us to collect and hold personal or sensitive Information from you. The purpose of collecting personal information is to facilitate financial planning, provision of financial products or services, insurance policies, or related services, and to update our records.

In collecting this information, we will take reasonable steps to inform individuals as to:

- Why we are collecting that personal information.
- Who else we might disclose that personal information to.
- What may happen if individuals do not provide personal information to us.
- How to gain access to that information.

Generally, we will not collect sensitive information about you unless we are required to do so by law or unless you provide consent. 'Sensitive information' includes information about your race or ethnicity, political opinions, criminal record, sexual information, or biometric information. However, we may collect sensitive information from you in relation to religious beliefs or affiliations and other health, medical or genetic information if it will have an impact on the services we provide to you.

We will only use sensitive information for the purposes for which it was provided unless you agree otherwise or the use or disclosure of this information is permitted by law.

Documents asking for sensitive information will explain this and we will only collect sensitive information from you where reasonably necessary for us to provide a service to you and with your consent, or in limited other circumstances specified under the Privacy Act or under the Corporations Act 2001 (Cth) ('Corporations Act').

HOW DO WE COLLECT YOUR PERSONAL INFORMATION?

Generally, we collect your personal information directly from you. We could do this in a number of ways, including through face-to-face interviews, email correspondence, and other online mediums.

We may also collect personal information about you from third parties such as:

- Referral partners; and
- Other organisations, service providers, or business partners who provide you with products or services along with us.

WHY WE COLLECT PERSONAL INFORMATION

Pursuant to the Corporations Act we are required to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. Alternatively, we may elect to terminate our relationship with you if we believe we are unable to provide you with adequate service.

Other purposes for which we are required to collect your personal information include:

- Verifying your identity for anti-money laundering and counter-terrorism financing purposes.
- Managing your ongoing requirements, our ongoing relationship with you and to improve our services.
- Internal functions such as administration, accounting, and information technology system requirements.
- Complying with legal and regulatory requirements,
- In order to prevent fraud or crime.
- Sending you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. You may opt out of this at any time by contacting us.
- Enhancing customer service and product options.
- Handling complaints; and
- Giving you educational information, newsletters, or opportunities that we believe may be relevant to your financial needs and circumstances.

TYPES OF PERSONAL INFORMATION WE COLLECT AND STORE

- Name, address, date of birth and phone number.
- Details of your financial needs and objectives.
- Details of your investment preferences and risk tolerance.
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, etc.
- Information about your employment history, employment circumstances, family structure, commitments, and social security eligibility.
- Any other relevant information including medical history and/or reports required for the purposes of risk insurance.

DISCLOSURE OF PERSONAL INFORMATION

We will not use or disclose personal information collected by us for any purpose other than to perform the professional services you have contracted us to do. We will not use it for anything 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 we are 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.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Financial planners, credit providers, and brokers and those who are authorised by us.
- Service providers and specialist advisers to us who have been contracted to provide us with administrative, financial, insurance, accounting, legal, information technology, research, or other services.
- Other insurers, credit providers, courts, tribunals, and regulatory authorities as agreed or authorised by law.
- Credit reporting or reference agencies or insurance investigators.
- AUSTRAC, the government agency who oversees Anti Money Laundering and Counter Terrorism Financing.
- External dispute resolution bodies to manage your complaint; and
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution, or similar event.

Additionally:

- We may be required to make certain information available for inspection by Professional Associations which we are members of, as part of ongoing compliance with 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.
- We may disclose your personal information to superannuation fund trustees, insurance providers, credit providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.
- In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our agents or representatives who will be your primary point of contact.

It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

Generally, we require that organisations outside our group who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy, and comply with the privacy law.

DISCLOSURE OF INFORMATION OVERSEAS

We are unlikely to disclose personal information to overseas recipients. In some circumstances, we may need to obtain your consent before this occurs. If cloud storage of electronic information is deemed necessary, our policy is to only use cloud or other types of networked or electronic storage where infrastructure is physically located in Australia. We have conducted our due diligence regarding our cloud service providers and have entered into suitable contractual arrangements with them.

STORING AND PROTECTING YOUR INFORMATION

We strive to maintain the relevance, reliability, accuracy, completeness, and currency of the personal information we hold and to protect its privacy and security.

We generally keep personal information for up to 7 years from the date our financial advice was provided to you or for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. We will destroy or de-identify your personal information when it is no longer required.

We hold the information we collect from you in physical and electronic records, which may be stored at our premises or in secure data centres or in the cloud.

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification, or disclosure.

We also instruct our staff and Representatives to respect confidentiality, adhere to policies, and obey the law. Transgressions are reported and dealt with as required by the law.

ACCESS AND CORRECTION

You may have the right to access and request corrections of the Personal Information held by us. This right of access is subject to some exceptions permitted by law.

We will not provide you access to personal information which would reveal any confidential information or the detail of any in-house evaluative decision-making process but may instead provide you with the result of the decision-making process or an explanation of that result.

We reserve the right to charge a reasonable fee for searching for and providing access to your personal information. In the event we refuse you access to your personal information; we will provide you with an explanation for the refusal.

We will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependant to a large degree on the information you provide, and you should advise us if there are any errors in your personal information.

HOW CAN YOU CONTACT US ABOUT PRIVACY?

You can contact us at PO Box 2390 Wagga Wagga NSW 2650: 53 Trail Street Wagga Wagga NSW 2650, or by phone 02 69317000, or via email mail@adamsassoc.com.au.

Correspondence should be addressed for the attention of the Privacy Officer. Please ensure that you provide sufficient information for us to be able to contact you if we require clarification of the matters that you raise.

If you wish to contact us to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, in most cases we will contact you within five working days of receipt of your complaint to let you know what action we are taking regarding your complaint.

Alternatively, you can contact the Office of the Australian Information Commissioner, on 1300 363 992 or online at oaic.gov.au.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

ABOUT THIS POLICY

This policy is effective as of 1 April 2026. We will update this policy as and when required and post the updated policy on our website www.adamsassoc.com.au.