Privacy Statement and Policy

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Sayers Wealth Pty Ltd
ACN 642 217 007
AFS Licence No. 525093
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At Sayers Wealth Pty Ltd we respect and value the privacy of our clients and are committed to safeguarding the Personal Information that we collect and use in the course of our business.

We will meet the obligations of the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Together, the Privacy Act and the APPs regulate the way in which an organisation can collect and deal with personal and sensitive information, as well as the measures it must take to safeguard that information.

References to Sayers, we, us, our, are made in respect of Sayers Wealth Pty Ltd and its affiliates.

The Privacy Act defines Personal Information as information or an opinion about an identified individual who is reasonably identifiable. The term Personal Information may include a wide range of information, including an individual’s name, address, signature, date of birth, credit information, employee records, tax file numbers and other sensitive information.

Sensitive information is Personal Information that includes information or an opinion about an individual’s racial or ethnic origin, religious or philosophical beliefs, political opinions or associations, sexual orientation, criminal record, health or genetic information, trade union membership or associations and some aspects of biometric information.

We are committed to safeguarding the Personal Information that we collect, use and store in the ordinary course of operating our business. We acknowledge the trust that our clients place in us by sharing Personal Information with us, and the importance of honouring that trust by keeping Personal Information secure. We have emphasised the importance of this to our employees, Board of Directors, strategic partners and suppliers.
In order to identify you and your financial circumstances or any other related information necessary to provide you with financial advice, services and products, we may request for, collect, and store a range of Personal Information. This shall include, but not be limited to:

— your full name, date of birth, gender and contact details including address, email address, and telephone number
— identification documents such as drivers’ license and/or Passport
— your tax file number and bank account details
— nationality
— business structure and employment information
— your source of wealth
— copies of relevant trust deeds, partnership agreements, certificates of incorporation, constitutions or articles of association
— sensitive information

In addition, we are required to collect and retain Personal Information under the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth), the Foreign Account Tax Compliance Act 2010 (USA) and the Tax Laws Amendment (Implementation of the Common Reporting Standard) Act 2016 (Cth), which may include Sensitive Information.

The Personal Information that is requested of you, will be information that enables us, our strategic partners and other service providers to provide you with services and products. If you do not provide this Personal Information or consent to the use and store of this information, we may not be able to provide the services and products that you require.
We may collect, use, and disclose Personal Information in a number of ways. Where practical we will collect information directly from you. This may be done directly, via phone, email or other electronic means such as digital forms through our web portals.

In some circumstances we may gather Personal Information about you from other sources, including but not limited to:

— your accountant
— your authorised representatives, executors or administrators
— identify verification providers
— credit agencies
— public sources

In the event that a third party provides us with your Personal Information we will assume that you have provided your consent to that Third Party, unless you inform us otherwise. If you have any concerns with us receiving information from a Third Party, you should contact us and the third party to address your concerns.

The Personal Information that is requested of you, will be information that enables us, our strategic partners and other service providers to provide you with services and products. If you do not provide this Personal Information or consent to the use and store of this information, we may not be able to provide the services and products that you require.

The purpose of collecting, holding, using and storing Personal Information is so that we may provide you with the services that you require and to meet our regulatory obligations. In the context of Sayers’ business, the main reasons include:

In some circumstances we may gather Personal Information about you from other sources, including but not limited to:

— establishing and administering investment accounts in Australia and Overseas on your behalf
— to communicate with you
— to comply with our regulatory reporting and tax obligations, or other requests as required or authorised by law
— to ensure that we understand your personal context so that we may provide you with financial advice or financial services
— to process any orders and applications made by you
We may store your Personal Information in either physical or digital form or both. We take reasonable measures to protect it from misuse, unauthorised disclosure, modification or access. We do this in a number of ways including:

— confidentiality requirements for all employees, strategic partners and suppliers
— secure access to electronic and physical Personal Information records
— segregating access to information to only those that require the Personal Information, with consideration to seniority and functional responsibilities
— secure access to our offices
— electronic security using data encryption

You are entitled to request details on how and where your Personal Information is held by Sayers. You may do so by contacting Sayers’ Privacy Officer.
By providing information to us your Personal Information, you acknowledge and agree to us providing your Personal Information to any of the following third parties:

— any regulatory or governmental organisation, industry body or any other legal body that governs or regulates our organisation. This may include, amongst others, the Australian Securities and Investment Commission (ASIC), Australian Transaction Reporting and Analysis Centre (AUSTRAC), Australian Financial Complaints Authority (AFCA) or the Australian Taxation Office (ATO).

— any financial market, clearing house, settlement facility, credit provider or credit agency, custodian, share registry or software provider required to provide the services we have committed to you.

— any person for the purposes described in any of our agreements with you including our strategic partners, including but not limited to, Powerwrap Limited, Netwealth Investments Limited, myprosperity Australia Pty Ltd, and other global wealth management strategic partners.

— any person that you have authorised to act on your behalf including authorised representatives, lawyers, accountants, trustee, guardian or attorney.

— any issuer of a financial product where you have instructed us to purchase the financial product and where its purchase requires disclosing your Personal Information

— our auditors, consultants and other professional advisers.

— any organisation we have engaged in providing, managing, or administering our services. This may include but is not limited to mail houses and software providers.

— our related bodies corporate whether in Australia or any overseas jurisdiction.

— any other third party that you consent to us disclosing your Personal Information to

— or as otherwise permitted by law
By providing Personal Information to us, you acknowledge and agree that this information may be transferred between related bodies corporate to Sayers. These related bodies corporate may be located in Australia or around the world. Where these bodies corporate are located overseas, you acknowledge that laws related to privacy in those countries may be more or less stringent than the privacy laws prevailing in Australia.

Sayers has arrangements in place with parties in countries outside of Australia. The Sayers service provides the opportunity for clients to invest with Global Private Banks in other countries, including but not limited to those domiciled in Switzerland, Singapore and Hong Kong. Your Personal Information may also be disclosed to third parties in other countries as required to provide services to you, or as otherwise authorised by you.

In circumstances where we are required to disclose your Personal Information to a jurisdiction that maintains lesser Privacy Standards, we will undertake reasonable measures to ensure that the relevant overseas recipient of Personal Information does not breach the Privacy Act or the APPs. If the overseas recipient does handle your personal information in breach of the APPs, you will not be able to seek redress under the Privacy Act, nor will we be liable under the Privacy Act.

We rely on the accuracy of the Personal Information provided to us. We aim to ensure that this information is kept up to date through direct contact, digital and other means, however, should you be aware that any of your details with us require updating or amendment, or have any concerns regarding its accuracy, please contact us.

We will respond to your privacy enquiry promptly and provide appropriate answers where permitted by law. We may charge a reasonable fee for access to Personal Information. Should you find that this Personal Information is inaccurate or requires updating, please contact us so that we may update our records accordingly.
If you are not satisfied with our handling of your Personal Information, please contact Sayers in writing with the details of your request with the rectification that you seek. If you are not satisfied with our response to your complaint, you may have the right to complain to:

**Australian Financial Complaints Authority**
GPO Box 3
Melbourne VIC 3001

- **e:** info@afca.org.au
- **w:** www.afca.org.au
- **t:** 1800 931 678

Furthermore, if you remain dissatisfied with the outcome of the complaint following its determination by the Australian Financial Complaints Authority (AFCA) or are not eligible to complain to AFCA, then you may address your concerns to the Office of the Australian Information Commissioner:

**Office of the Australian Information Commissioner**
GPO Box 5218
Sydney NSW 2001

- **w:** www.oaic.org.au
- **t:** 1300 363 992

If you have any questions relating to this Privacy Statement, accessing or correcting your personal information, or have any concerns regarding how we have collected, used or stored your personal information, please contact our Privacy Officer at:

**The Privacy Officer**
Sayers Wealth Pty Ltd
Level 1
150 Collins St
Melbourne VIC 3000

- **e:** privacy.officer@sayers.group
- **t:** 1300 877 866