



## PRIVACY POLICY

BPW Partners Pty Ltd ("BPW") and its associated entities (Brisbane Private Wealth Pty Ltd, HB Pink Financial Planning Pty Ltd ATF HBB Trust), regard Privacy as a pertinent issue and understands that it is important for you to know how we handle your personal information.

Privacy Laws apply to how we collect, hold, use and disclose your personal information. BPW complies with its obligations under the Privacy Act 1988 and the associated Australian Privacy Principles ("APPs") and is committed to protecting the privacy of your personal information.

You can obtain further details of our obligations as an organisation under Australia's privacy laws from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner's associated guidelines at [www.oaic.gov.au](http://www.oaic.gov.au).

The following Privacy Policy has been published to provide you with an outline of the following:

- What information we collect about you;
- How we collect personal information;
- What we do with your personal information;
- Who we disclose personal information to;
- How we protect your personal information;
- How to keep your personal information accurate and up to date;
- How you can access your personal information; and
- Who to contact if you have any questions about this Policy or wish to make a complaint.

### TYPES OF PERSONAL INFORMATION THAT WE COLLECT, USE AND HOLD

We may collect and hold a range of personal information about you to provide you with our services, including:

- identification information including your full name, residential address, and date of birth;
- gender;
- marital status;
- occupation;
- driver's licence and/or passport details;
- contact details (including telephone and email addresses);
- information about your financial position including details of assets, liabilities, income and expenses; and
- any other information we may need to provide you with our services.

We may collect sensitive information from you. Sensitive information (for example) may include information relating to a person's health. We will only collect sensitive information that is reasonably necessary for us to provide you with our services.

### WHY WE COLLECT YOUR PERSONAL INFORMATION

We may use and disclose the information we collect about you for the following purposes:

- (a) establishing your identity;
- (b) checking whether you are eligible for our services;
- (c) providing you with our services;
- (d) managing and administering our services;
- (e) responding or dealing with a complaint;
- (f) providing information we believe may be relevant or of interest to you;
- (g) direct marketing;
- (h) data analytics and statistical analysis;
- (i) to notify you of other products, services, special offers or events;
- (j) where you otherwise expressly consent to the use or disclosure;
- (k) complying with legislative and regulatory requirements in any jurisdiction; and
- (l) to assist BPW in the running of its business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Some laws require or authorise our collection of your personal information including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006(Cth).



Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

We will retain the information we collect from you for a period of at least 7 years, as required by law.

## HOW WE COLLECT YOUR PERSONAL INFORMATION

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our services.

We may also collect your information from your representatives or professional advisers.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies.

These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services, or meet your needs appropriately.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information that is not relevant, we will destroy or de-identify that personal information as soon as practicable.

## DISCLOSURE OF YOUR PERSONAL INFORMATION

In order to provide you with services, we may need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- (a) to any of BPW's related companies;
- (b) our agents, contractors and external service providers;
- (c) to our professional advisers, auditors and insurers;
- (d) your representatives;
- (e) the Australian Financial Complaints Authority or Office of the Australian Information Commissioner;
- (f) organisations involved in a transfer or sale of our assets or business;
- (g) anyone to whom the disclosure is required or permitted under the Privacy Act, other Australian Law, Regulation or Court/Tribunal Order; and
- (h) anyone else where you have provided your consent.

We may disclose your personal information to overseas entities that we deal with in the course of our business. These recipients may be located in the following countries:

- N/A

We will not disclose personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act and the APPs; or
- the recipient is subject to an information privacy scheme similar to the Privacy Act.

## KEEPING YOUR PERSONAL INFORMATION ACCURATE AND UP-TO-DATE

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

## HOW WE HOLD YOUR PERSONAL INFORMATION

We recognise the importance of securing the personal information of our clients. We store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure. Where information is held electronically, we utilise technological safeguards to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. These measures include regular security assessments, encryption, access controls including passwords, multifactor authentication, and secure data storage practices.



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## DATA BREACH RESPONSE

BPW has a Data Breach Response Plan in accordance with the Notifiable Data Breaches (NDB) scheme. In the event of a data breach, BPW will promptly assess the breach, take steps to contain it, and notify affected individuals and the Office of the Australian Information Commissioner (OAIC) where required.

## STAFF TRAINING AND GOVERNANCE

BPW provides regular privacy training to staff and maintains internal governance frameworks to ensure compliance with privacy obligations. Staff are trained to handle personal information responsibly and in accordance with the APPs.

## USE OF ARTIFICIAL INTELLIGENCE (AI)

We use AI-powered tools to assist with note taking during client interactions. These tools may process personal information shared during meetings to generate summaries, action items, and records for internal use. The AI systems are configured to operate within secure environments and are subject to strict access controls, encryption protocols, and regular audits to ensure data protection.

Personal information processed by AI is handled in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). Clients may request further details about how their information is used in AI systems or opt out of AI-assisted note taking by contacting us using the details provided in the 'Contact Us' section of this policy.

## DIRECT MARKETING

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information;
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing;
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

## GAINING ACCESS TO YOUR PERSONAL INFORMATION

You can gain access to your personal information (subject to some exceptions allowed by law) by contacting the Privacy Officer. We will need to verify your identity first. We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances, it may take longer (for example, if we need to contact other entities to properly investigate your request).

We may refuse to provide you with access in certain circumstances. If access is refused, we will give you a notice explaining the reasons for our decision and your options to make a complaint.

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.



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## RESOLVING YOUR PRIVACY CONCERNS

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us on the details below. We are committed to resolving your complaint and doing the right thing by our customers. We will investigate your complaint and provide you with our response within 30 days. Please see our Complaints Policy available on our website at [www.bpwadvice.com.au](http://www.bpwadvice.com.au) for full details of how we deal with complaints.

If you are not satisfied with the outcome of your complaint, you are entitled to lodge a complaint with the Australian Financial Complaints Authority (AFCA):

Online: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Phone: 1800 931 678

Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

You may also contact the Office of the Australian Information Commissioner by:

Online: [www.oaic.gov.au](http://www.oaic.gov.au)

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

Phone: 1300 363 992

Mail: Director of Complaints, Office of the Australian Information Commissioner GPO Box 5218, Sydney NSW 2001

Contact Us:

Telephone: 07 3123 6947

Email: [licensee@bpwadvice.com.au](mailto:licensee@bpwadvice.com.au)

Address: Level 19, 127 Creek Street, Brisbane, QLD, 4000

Post: PO Box 10531, Brisbane, QLD, 4000