



FIRST *light.*

FINANCIAL PLANNING

FIRSTLIGHT FINANCIAL PLANNING PTY LTD

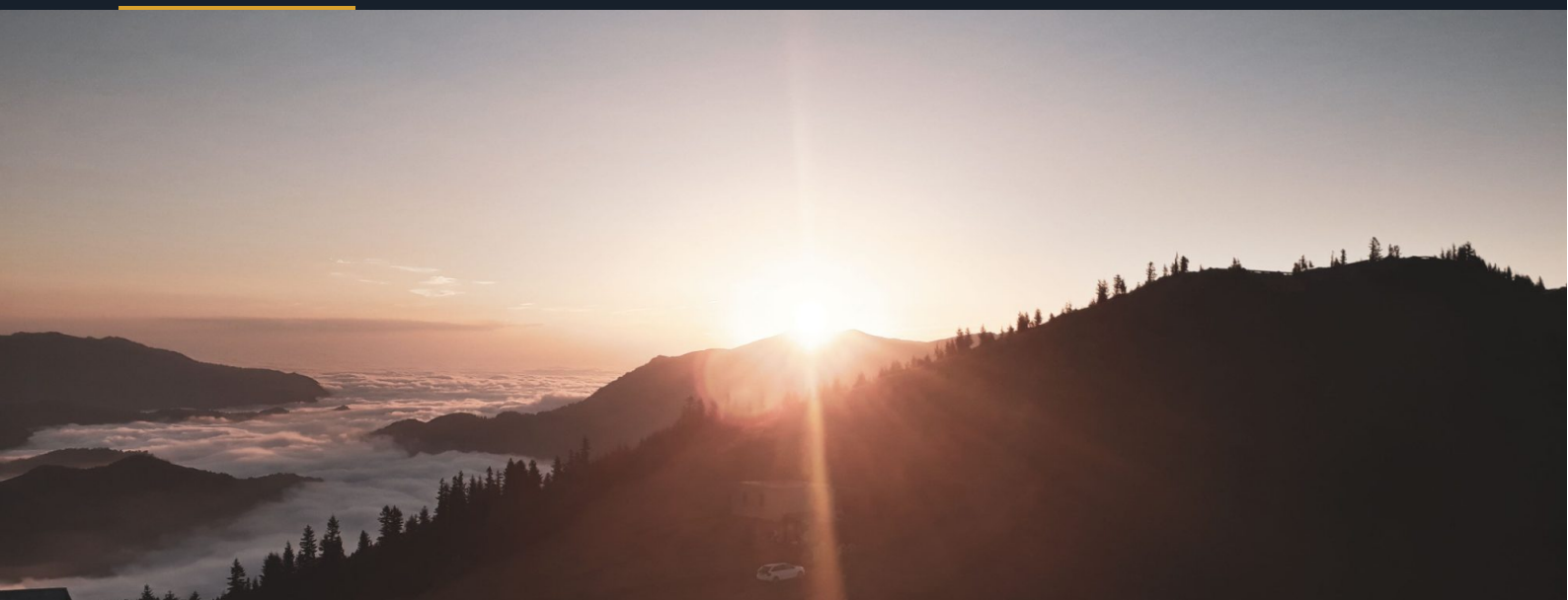
ABN 81 618 516 135 • AFSL 532193

11/76 Township Drive, Burleigh Heads QLD 4220

(07) 3132 8977 • clients@firstlightfp.com.au

www.firstlightfinancialplanning.com.au

Privacy policy.



Privacy policy.

Firstlight Financial Planning is committed to keeping your personal information confidential and secure.

This policy sets out why we need to collect personal information, and how we handle the information we hold about individuals – clients and prospective clients alike.

“Firstlight Financial Planning”, “Firstlight”, “we” and “us” mean all staff, representatives and associated entities of Firstlight Financial Planning Pty Ltd. The associated entities include Firstlight Business Insurance Pty Ltd (ABN 93 632 331 527), together the “Firstlight Group”. Given how closely these entities work together, this policy also covers information shared between them and their representatives.

Australian Privacy Principles

Firstlight holds all personal information in line with the Australian Privacy Principles (APPs) of the Privacy Amendment (Enhancing Privacy Protection) Act 2012. We will be open with you about how we use it.

Why we collect and hold personal information

Understanding your financial position, and helping you improve it, is the whole job. Firstlight collects personal information from you so we can provide you with products and services. We may also use it to keep you informed about what we offer, or to invite you to events. You can ask us to stop sending you marketing at any time – see “Queries and complaints”. The information may also be used to administer and manage our products and services, including for training, audit or data analysis, or for any other purpose you authorise.

We also collect and record information that helps us meet our legal obligations, including taxation, anti-money-laundering and counter-terrorism-financing requirements.

WHAT WE COLLECT

The information we may collect.

As a provider of financial services we are subject to legislative and regulatory requirements that oblige us to obtain and hold detailed information that personally identifies you. The personal information we may collect includes, but is not limited to:

- Name and address
- Date of birth
- Contact details
- Bank account details
- Tax file numbers

We may also need other personal information about your finances, assets and liabilities, current investments, income, marital status and gender, so that we can provide our services to you.

Health information

We may collect health information so that we can advise you on financial products and insurance. We will only disclose it where that is necessary to help you apply for a financial product, or where the law requires it.

Source of information

Wherever practicable we collect information from you personally. We may also collect it from external sources — your other professional advisers, for example, or our service providers.

Use and disclosure of collected information.

We use the personal information we hold to provide products and services to you, including financial advice and investment management. In some cases we need to disclose it to third parties outside the Firstlight Group. Unless you consent to that disclosure, we will not be able to provide you with our services. The organisations we may disclose your personal information to include, but are not limited to:

- regulators such as the Australian Transaction Reports and Analysis Centre (AUSTRAC), the Australian Securities and Investments Commission (ASIC), the Australian Taxation Office (ATO) and the Australian Prudential Regulation Authority (APRA);
- financial institutions, for the provision of financial products such as investments, superannuation and life insurance;
- organisations providing mailing services, maintenance of information-technology services, and printing of standard documents and correspondence;
- organisations providing research, technical (tax, legal and similar) or paraplanning services;
- your adviser or advisers;
- organisations we contract with to provide us with a service, such as software providers;
- any party acquiring an interest in our business; and
- where the law requires or permits us to do so.

From time to time we may use your contact details to send you information we think will be of interest. You can tell us to stop, by phone or in writing — see “Queries and complaints”. For analysis and product development, we anonymise your data.

Data quality

We aim to keep the information we hold about you accurate, complete and up to date. If at any stage you believe it is wrong or incomplete, contact us and show us the error. If what we hold is wrong, we will correct it.

Accessing collected information.

To see the personal information we hold about you, contact us. Firstlight will always ask you to identify yourself to our satisfaction and to give a reason for the request. We will then discuss how you would like to receive the information and the manner that suits you best. You may ask us to correct anything we hold, to your satisfaction.

Data security

The security of your personal information matters to us. It is held in secure, cloud-based storage. We use security procedures and keep our technology current to protect it. Access to the personal information we hold is limited, to protect it from misuse, loss, and unauthorised access, modification or disclosure. Where our service providers can see your personal information, we require them to have appropriate privacy policies and procedures of their own.

The law requires us to keep your personal information for a certain period — at least seven years. Once we no longer need it for any purpose, we destroy it by secure means or permanently de-identify it.

Identifiers

We will not adopt as our own any identifier you provide to us, such as a tax file number or a Medicare number.

Anonymity

Financial services do not lend themselves to anonymous clients. To provide a financial service, we need personal information about the individual it is for.

Transborder data flows.

Your personal information may be disclosed in a number of circumstances, including the following:

- to third parties, where you consent to the use or disclosure;
- where required or authorised by law;
- information provided via web forms may be used to protect the copyright, trademarks or legal rights of firstlightfinancialplanning.com.au, its clients or third parties;
- personal information we store may be processed in, or transferred between, parties located in countries outside Australia — including but not limited to New Zealand, the United Kingdom, the United States, Canada and the Philippines;
- by giving us your personal information, you consent to the terms of this privacy policy; and
- if there is a change of control in the business, or a transfer, we reserve the right to transfer our user databases together with all information provided under this policy, to the extent the law permits. That information may be disclosed to a potential partner under an agreement to maintain confidentiality.

Cookies

When you visit our website, details may be recorded about your visit — the time and date, server address, pages accessed, time spent and type of browser. This is used in anonymous form for statistical purposes and cannot identify you individually. We may use cookies to identify your browser, so that next time you visit we remember your log-in details. A cookie is a small file that stays on your computer and lets Firstlight Group websites recognise your browser. If you would rather not allow cookies, you can adjust your browser settings to reject them, or to notify you when they are being used.

Links to third-party websites

Firstlight Group websites may contain links to external websites that may benefit you. Those sites should have privacy statements of their own, and we recommend you read them. Third-party websites are not covered by this policy and are not subject to our privacy standards and procedures.

Your rights if you are in the EU.

Under the General Data Protection Regulation you have the right to access your data; to correct or rectify it; to delete it, subject to applicable law; to have it processed only in accordance with applicable law; to have copies of it moved to another controller; to object to our processing it otherwise than in accordance with the law; and to withdraw any consent to our processing it at any time. Email compliance@firstlightfp.com.au to exercise any of these rights.

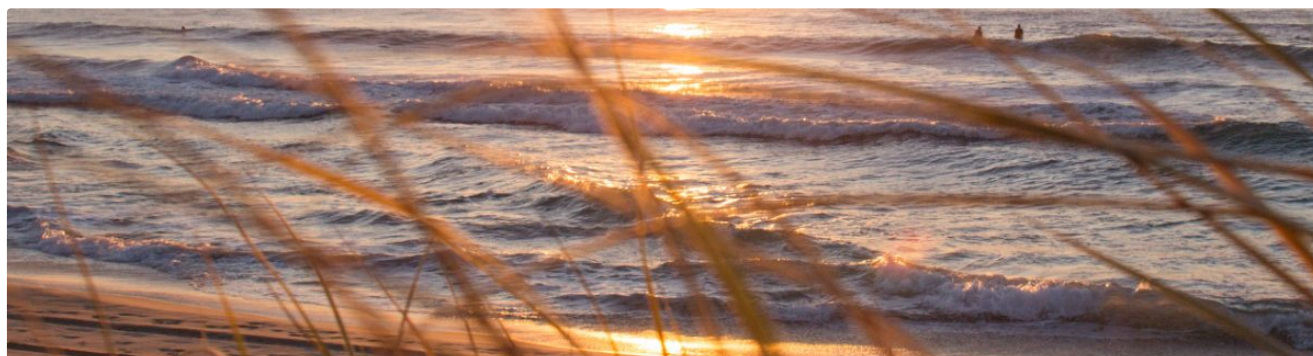
Queries and complaints

If you want more information about this policy, or wish to make a complaint about a possible breach of your privacy, write to the Firstlight Financial Planning Privacy Officer at compliance@firstlightfp.com.au. You can also call us on (07) 3132 8977.

We will do our best to resolve any complaint to your satisfaction. If you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner (enquiries@oaic.gov.au), who may investigate the complaint further.

Review

From time to time it may be necessary for the Firstlight Group to review this statement. Firstlight reserves the right to change this policy at any time without notification.





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