

# WOODBURY PRIVATE

## Privacy Policy

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[www.woodburyfs.com.au](http://www.woodburyfs.com.au)



Woodbury Financial Services, trading as Woodbury Private, is an authorised representative of WFS Capital Pty Ltd, ABN 28 632 825 373 Australian Financial Services License No. 520884 with registered office at Level 15, Grosvenor Place, 225 George Street Sydney NSW 2000.

# Woodbury Financial Services Privacy Policy

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The privacy of your personal information is important to us at Woodbury Financial Services. We are required to comply with the Australian Privacy Principles. Whenever we handle personal information, we take steps to ensure that appropriate standards of privacy and security are applied.

This notification covers us and tells you how we collect your information, how it is stored, what we use it for and who we share it with. The Policy also described how you can access or correct information we hold about you, how you can ask further questions or make a complaint and information about our websites and online activities. For a copy of our Privacy Policy, please ask us.

## Collecting Your Personal Information

We collect your personal information for a variety of purposes. These include providing you with financial services you have requested such as providing financial advice and managing your financial products. The kind of information that we may collect from you in order to provide you with financial services includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility;
- driver's licence and/or passport details and
- any other information that we consider necessary.

The personal information collected may include sensitive information, which will only be collected if it is relevant to your financial products or the service or function you are engaging us to provide. We will not collect sensitive information about you where this is expressly prohibited by law. Sensitive information includes information relating to:

- Race
- Political or religious beliefs
- Sexual orientation and sexual life
- Criminal convictions
- Membership of professional and trade associations or unions
- Biometric and health information
- Information about your affiliation with certain organisations, such as professional associations

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant, representatives or other professional advisers.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

If the personal information requested by your financial advisers is not provided, your financial adviser and Woodbury Financial Services may not be able to provide you with financial services, including providing you with financial advice that is appropriate to your investment needs, objectives and financial circumstances.

## **How Your Personal Information is Held**

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures that we have adopted include facilities for the secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

## **Using and Disclosing Your Personal Information**

Your personal information may be disclosed for purposes related to the provision of the financial services you have requested. The types of organisations that may be provided with your personal information are:

- other financial advisers and organisations involved in providing the financial services you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial service you have requested;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- our related companies;
- our agents, contractors and external service providers;
- anyone to whom the disclosure is required or permitted under the Privacy Act, other Australian Law, Regulation or Court/Tribunal Order;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

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.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

## **Organisations outside Australia**

Currently, we do not share your information with organisations outside Australia.

We may store your information in the 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's 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.

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

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

## **Accessing your Personal Information**

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access please contact us (see "Contacting Us and Privacy Issues" below). 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).

## **Correcting Your Personal Information**

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and provide us with evidence that it is not accurate, complete and up-to-date.

If we agree that the personal information requires correcting, we will take reasonable steps to do so within 30 days. If we do not correct your personal information we will provide you with the reasons for not correcting

your personal information. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

## **Contacting Us and Privacy Issues**

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us using the details below. We are committed to resolving your complaint.

### **Errol Woodbury – CEO**

Email: [errol@woodburyfs.com.au](mailto:errol@woodburyfs.com.au)

Phone: 02 9869 1933

If you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

### **Office of the Australian Information Commissioner**

- [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- Phone: 1300 363 992
- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

### **Australian Financial Complaints Authority (AFCA)**

- [www.afca.org.au](http://www.afca.org.au)
- Phone: 1800 931 678 (freecall)
- Email: [info@afca.org.au](mailto:info@afca.org.au)
- In writing to the Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001