

## **APP PRIVACY POLICY**

Waterfall Way Associates Pty Ltd abides by the Australian Privacy Principles (APP) established under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* which amends the *Privacy Act 1988*

We are required to collect and hold detailed information which personally identifies you and/or contains information or an opinion about you (Personal Information). Our ability to provide you with a comprehensive financial planning service is dependent on us obtaining certain Personal Information about you. If you elect not to provide us with the Personal Information, we may be unable to provide you with a complete service and may need to terminate our relationship with you. Both The *Corporations Act 2001* and Rules of Professional Conduct for members of the Financial Planning Association of Australia Limited require that we collect sufficient information to ensure appropriate advice can be provided

We will endeavour to ensure that, at all times, the Personal Information about you which we hold is up to date and accurate. We will take all reasonable steps to correct the information should we be made aware that any Personal Information which we hold about you is inaccurate, incomplete or outdated

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### **Collection of Your Personal Information**

We may collect Personal Information from you, or from your other professional advisers under a written authorisation from you

We will only collect, maintain and use Personal Information about you if it is necessary for us to provide to you the services you have requested

Examples of the types of Personal Information we may collect from you are:

- Employment details and employment history
- Details of your financial needs and objectives
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation
- Details of your investment preferences and aversion or tolerance to risk
- Information about your employment history, employment circumstances, family commitments and social security eligibility

Examples of the services we provide are:

- The preparation of your financial plan
- The provision of financial planning advice or credit assistance to you
- Making securities and investment or insurance recommendations
- Reviewing your financial plan
- Reviewing securities and investment or insurance recommendations

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### **Disclosure of Your Personal Information**

We will only disclose Personal Information collected by us to a third party for the following reasons:

- The purpose for which it was provided
- A secondary, related purpose where you would reasonably expect such use or disclosure
- Where you have consented to such disclosure
- 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

We may disclose your Personal Information to superannuation fund trustees, insurance and credit providers, product issuers and government departments/agencies for the purpose of implementing recommendations made by us to you

We will not disclose your Personal Information to overseas recipients

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## Protection of Your Personal Information

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We will at all times seek to ensure that the Personal Information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your Personal Information is treated as confidential and any sensitive information is treated as highly confidential

All paper files are stored in lockable cabinets which are locked out of hours

All passwords are 128 bit encryption standard where possible and are regularly reviewed and changed

Access to our premises is controlled by allowing only authorised personnel with keys to access the premises

Electronic data is backed up regularly and stored securely off site

All computers, tablets and smartphones that contain Personal Information are protected through the use of access passwords

We avoid cloud-based programs where your personal data is transferred to another jurisdiction

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## Your Access to Personal Information we have about you

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In the event you cease to be a client of this business, any Personal Information which we hold about you will be securely maintained for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed

You may at any time request access to your Personal Information and we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity

In the event we refuse you access to your Personal Information, we will provide you with an explanation for the refusal

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## Complaints and Concerns

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If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact the Privacy Officer:

Privacy Officer:	Tim Harris
Address:	Suite 607, 24 Moonee Street, COFFS HARBOUR NSW 2450
Telephone:	02 6650 0522
Facsimile:	02 6650 0255
Email:	tharris@waterfallfp.com.au

Your complaint will be considered within seven days and answered. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Privacy Commissioner who may investigate your complaint further:

Address:	Level 3, 175 Pitt St, SYDNEY NSW 2000
Telephone:	1300 363 992
Facsimile:	02 9284 9666
Email:	enquiries@oaic.gov.au
Website:	<a href="http://www.oaic.gov.au">http://www.oaic.gov.au</a>