Privacy Policy

16 March 2022– **Adviser use only**

Sear Financial Services Privacy Policy

The privacy of your personal information is important to us at Sear Financial Services. We are required to comply with the Australian Privacy Principles. We will comply with the Australian Privacy Principles as well as other applicable laws affecting your personal information.

This privacy policy outlines our policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

Collecting Your Personal Information

Your personal information will be collected and held by Skei Harper, who is an authorised representative of Millennium3 trading as Sear Financial Services, an Australian Financial Services Licensee, for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research, and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- protect our business and other clients from fraudulent or unlawful activity;
- to comply with relevant laws, regulations, and other legal obligations;
- to help us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested; and
- for any purpose for which you have given your consent.

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This 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; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade 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, or others whom we believe you have authorized to provide information to us.

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.

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 are having 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 advice you have requested. The types of service providers that may be provided with your personal information are:

- other financial advisers and organisations involved in providing the financial advice 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 advice 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;
- 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.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

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. Overseas organisations may be required to disclose information we share with them under a foreign law.

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).

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 let us know what information is incorrect.

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

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.

Sear Financial Services, Skei Harper 0409 134 849 - Suites 3-4/73 Robinson St Dandenong Vic 3175

We are committed to working with you to resolve a complaint involving your personal information. However, 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
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au

Or

- Australian Financial Complaints Authority (AFCA)
- Website: www.afca.org.au
- Email: info@afca.org.au
- Telephone: 1800 931 678 (free call)
- In writing to: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.