We take your privacy seriously at Collins SBA

RESPECTING YOUR PRIVACY AND THE LAW

Collins SBA

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PRIVACY POLICY

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We take your privacy seriously

Collins SBA is committed to protecting your privacy and handling your personal information responsibly.

We are subject to the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs) and also have confidentiality, professional and regulatory obligations arising from the services we provide.

This Privacy Policy explains:

- what personal information we collect and hold;
- how and why we collect it;
- how we use and disclose it;
- how we protect and retain it;
- when information may be accessed or processed outside Australia;
- how you can access or correct your information;
- how we respond to privacy and data security incidents; and
- how you can make a privacy complaint.

This policy applies primarily to clients, prospective clients and other individuals with whom Collins SBA deals in the course of providing its services.

We maintain a separate Employment Privacy Policy concerning employees, contractors and job applicants.

1. Who are we?

Collins SBA is a group consisting of:

SBA Financial Group Pty Ltd **ABN 17 073 859 346**	Provides accounting and taxation services.
SBA Wealth Management Pty Ltd **ABN 58 585 824 199**	Provides wealth advisory services as a corporate authorised representative of SBA Advice Pty Ltd.
SBA Advice Pty Ltd **ABN 44 611 373 383** **AFSL 488301**	Australian Financial Services Licensee.
Collins SBA Nominees Pty Ltd **ABN 87 104 489 330**	Provides business administration and support services to other Collins SBA entities.

Collectively and separately, these entities are referred to in this policy as Collins SBA, we, us or our.

The Collins SBA entities may share information with each other where reasonably necessary to provide services, administer our business or comply with our obligations.

2. What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Depending on the services we provide to you, personal information may include:

- your name, signature and contact details;
- date of birth;
- identification information;
- employment and income information;
- financial information;
- taxation information;

- banking information;
- information about assets and liabilities;
- investments and superannuation;
- insurance information;
- business and company information;
- family and relationship information;
- social security information;
- government-related identifiers;
- information about your financial objectives, needs and circumstances;
- investment preferences and risk tolerance;
- information concerning companies, trusts, partnerships and other entities with which you are associated; and
- other information reasonably required to provide our services or comply with our obligations.

The information we need will depend on the services you ask us to provide. If you do not provide information that we reasonably require, we may be unable to provide some or all of those services.

3. Sensitive information

Some personal information is treated as sensitive information under the Privacy Act. This can include information about matters such as:

- health;
- racial or ethnic origin;
- political opinions or associations;
- religious or philosophical beliefs;
- professional or trade association membership;
- trade union membership;
- sexual orientation or practices;
- criminal history;
- genetic information; and
- certain biometric information.

We will only collect sensitive information where it is reasonably necessary for our functions or services and you have consented, or where collection is otherwise permitted or required by law.

For example, health information may be relevant when providing financial advice concerning insurance, retirement planning, estate planning or other matters where your health circumstances affect the advice sought.

4. What information do we collect for financial advice?

To provide financial advice, we need to understand your objectives, financial situation, needs and relevant circumstances.

Depending on the advice you request, we may collect information including:

- your name, contact details and date of birth;
- identity information;
- employment and income details;
- assets and liabilities;
- income and expenditure;
- investments;
- superannuation;
- insurance arrangements;
- taxation information;
- financial needs and objectives;
- investment preferences;
- attitude to and tolerance for investment risk;

- family circumstances;
- dependants and beneficiaries;
- social security eligibility;
- estate-planning information; and
- other information relevant to the advice being provided.

Your financial adviser is an authorised representative of SBA Advice Pty Ltd, AFSL 488301.

The information we collect enables us to:

- understand your circumstances;
- provide the financial advice or ongoing services you have requested;
- assess appropriate strategies and financial products;
- implement instructions you give us;
- meet financial-services and professional obligations;
- manage our relationship with you; and
- maintain appropriate records of the advice and services we provide.

Where information about your partner, dependants, beneficiaries, children or another person is relevant to the services you request, please only provide that information where you are authorised to do so or where it is otherwise appropriate and lawful for you to provide it.

5. What information do we collect for accounting and taxation services?

To provide accounting, taxation, corporate administration and related services, we may collect information including:

- your name, contact details and date of birth;
- identification information;
- employment and income information;
- taxation information;
- banking information;
- assets and liabilities;
- income and expenditure;
- investments;
- superannuation;
- business activities;
- interests in companies, trusts and partnerships;
- family circumstances;
- information concerning directors, shareholders, trustees and beneficiaries;
- government-related identifiers; and
- other information reasonably required to prepare, advise on or lodge relevant accounts, taxation or corporate documents.

We may use this information to:

- prepare financial statements;
- prepare and lodge tax returns and other taxation documents;
- provide taxation and accounting advice;
- administer companies, trusts and other structures;
- undertake ASIC or other corporate-registry work where authorised;
- communicate with government agencies on your behalf where authorised;
- manage our relationship with you; and
- meet our legal, professional and regulatory obligations.

Tax File Numbers

SBA Financial Group Pty Ltd is a registered tax agent.

We may request and retain your Tax File Number (TFN) where it is reasonably required for taxation or related professional services.

You are not always legally required to provide your TFN to us. However, if we need it to properly perform the services you have requested and you choose not to provide it, we may be unable to provide some services or there may be other taxation consequences.

TFN information is subject to additional legal protections. We will only collect, store, use and disclose TFN information where authorised by applicable law.

Director identification numbers

We may collect and retain a director identification number (director ID) where required to provide authorised corporate registry, accounting, company-secretarial or related services.

Government-related identifiers are only used or disclosed for authorised purposes and are not adopted by Collins SBA as our own identifier of you.

6. Other personal information we may collect

We may also collect personal information in connection with:

- enquiries about our services;
- prospective client relationships;
- referrals;
- professional or business relationships;
- events or seminars;
- suppliers and service providers;
- complaints;
- legal or regulatory obligations;
- website enquiries;
- newsletters and marketing communications; and
- other business interactions.

We seek to collect only information reasonably necessary for the relevant purpose.

7. How do we collect personal information?

Where reasonable and practicable, we collect personal information directly from you.

We may collect information when you:

- meet with us;
- speak with us by telephone or videoconference;
- provide documents or information electronically;
- send us emails or correspondence;
- complete a form, questionnaire or fact find;
- use one of our online services;
- give us access to information held by another provider; or
- otherwise communicate with us.

We may also receive information from other sources where appropriate, including:

- your accountant, lawyer, financial adviser or other professional adviser;
- banks and financial institutions;
- insurers;
- superannuation funds;
- investment and product providers;
- brokers;
- government bodies and regulators;
- the Australian Taxation Office;
- ASIC and corporate registries;
- authorised representatives;
- family members or other persons acting with appropriate authority;

- publicly available sources; and
- other persons or organisations where you have authorised the disclosure or the collection is otherwise permitted by law.

Where we receive personal information we did not request, we will determine whether it is appropriate and lawful for us to retain it.

8. Information about other people

The services we provide may require information about people other than the person instructing us. For example, this may include information about:

- a spouse or partner;
- children or other dependants;
- beneficiaries;
- directors;
- shareholders;
- trustees;
- business partners; or
- other individuals associated with a company, trust, partnership or family group.

If you provide us with another person's personal information, you should only do so where you have authority to provide it or where it is otherwise appropriate and lawful.

Where required, we may contact that individual directly or provide them with information about how we handle their personal information.

9. How do we use your personal information?

We generally use personal information for the purpose for which it was collected. We may also use it for related purposes that you would reasonably expect or where the use is otherwise authorised or required by law.

This may include:

- providing and administering our services;
- carrying out your instructions;
- communicating with you;
- managing our client relationship;
- assessing and improving our services;
- maintaining client and regulatory records;
- verifying identity;
- meeting professional, licensing and regulatory requirements;
- managing risk and compliance;
- preventing and detecting fraud or other unlawful activity;
- managing complaints and disputes;
- obtaining legal, accounting, technology or other professional services;
- protecting our systems and information;
- complying with court, tribunal, regulator or government requirements; and
- conducting and administering our business.

We will take reasonable steps to ensure that personal information we use is accurate, up to date, complete and relevant having regard to the purpose for which it is being used.

10. Direct marketing

We may use your personal information to tell you about products, services, events or information that we believe may be relevant to you. This may include information from Collins SBA or SBA Advice Pty Ltd.

You may ask us at any time not to send you direct marketing communications.

Marketing communications will generally contain a way to unsubscribe or you may contact us using the details at the end of this policy.

Opting out of marketing communications will not prevent us from sending communications that are necessary to provide services to you or meet our legal or regulatory obligations.

11. Who may we disclose your personal information to?

We may disclose personal information where reasonably necessary to provide our services, administer our business or comply with our obligations.

Depending on the service, recipients may include:

- other Collins SBA entities;
- SBA Advice Pty Ltd;
- financial advisers and paraplanners;
- investment and fund managers;
- superannuation trustees;
- insurers and insurance providers;
- financial product providers;
- financial institutions;
- brokers;
- accountants;
- lawyers;
- tax agents;
- auditors;
- professional advisers;
- government agencies and regulators;
- the Australian Taxation Office;
- ASIC;
- professional and regulatory bodies;
- technology and software providers;
- cloud and data-storage providers;
- IT and cyber-security providers;
- administrative and business-support providers;
- research and compliance providers;
- insurers and insurance brokers;
- contractors and service providers assisting Collins SBA;
- a person you have authorised us to deal with; and
- other persons or organisations where disclosure is permitted or required by law.

Where you ask us to work with another professional or service provider on your behalf, we may disclose information reasonably necessary for that purpose.

If Collins SBA undergoes a merger, restructure, sale, acquisition or similar transaction, personal information may also be disclosed where reasonably necessary for due diligence, the transaction or transfer of relevant business activities, subject to appropriate confidentiality and privacy protections.

12. Overseas access and processing

Collins SBA uses technology, cloud services, contractors and other service arrangements that may involve personal information being stored, accessed or processed outside Australia.

This can include:

- offshore personnel who support Collins SBA;
- software and cloud providers;
- technology providers;
- professional service providers; and

- other approved third-party arrangements.

The countries and locations involved may change as our systems, providers and business arrangements change. For that reason, Collins SBA maintains information about material overseas processing arrangements through its internal privacy governance processes rather than relying on a static list in this policy.

Where the Australian Privacy Principles apply to an overseas disclosure, Collins SBA will take reasonable steps required by applicable privacy law in relation to that disclosure.

If you would like information about material overseas processing relevant to your personal information, you may contact us.

13. How do we protect your personal information?

We take reasonable steps to protect personal information from:

- misuse;
- interference;
- loss;
- unauthorised access;
- unauthorised modification; and
- unauthorised disclosure.

Our safeguards include a combination of technical, organisational and physical measures appropriate to the nature of the information and the risks involved. These may include:

- access controls;
- authentication controls;
- secure systems and networks;
- cyber-security protections;
- controlled access to client records;
- secure document handling;
- staff privacy and security obligations;
- training and awareness;
- third-party security arrangements;
- secure disposal processes; and
- incident-response procedures.

We may hold information in electronic client files, cloud services, business systems, databases, secure physical storage or a combination of these.

No method of electronic transmission or storage is completely risk free. Please contact us if you have concerns about sending particularly sensitive information electronically so that an appropriate method of transfer can be considered.

14. Artificial intelligence and automated technologies

Collins SBA may use approved artificial intelligence, automation or similar technologies to support aspects of its business and professional services.

Where personal information is used with these technologies, Collins SBA requires the use to be consistent with its privacy, confidentiality, information-security and professional obligations.

Relevant controls may include:

- using approved systems;
- limiting personal information to what is reasonably necessary;
- protecting sensitive and confidential information;
- appropriate human review and oversight; and
- maintaining accountability for professional work and decisions.

We do not treat AI-generated content as inherently accurate and appropriate human oversight applies to its use.

Where AI or automated technologies are used in a way that requires specific disclosure under applicable law or professional obligations, Collins SBA will provide that disclosure.

15. How long do we retain your information?

We retain personal information and client records for periods appropriate to the services we provide and our legal, regulatory, professional and business obligations.

The required period varies depending on the type of information and may be affected by:

- taxation laws;
- corporations laws;
- financial-services requirements;
- professional standards;
- regulatory requirements;
- litigation or dispute requirements;
- contractual obligations; and
- the nature of the ongoing client relationship.

Some information may need to be retained for an extended period where it has continuing relevance. For example, taxation or historical financial information may remain relevant to future tax calculations or other professional work.

We do not apply a single seven-year period to all personal information.

Where personal information is no longer required and there is no legal, regulatory, professional or legitimate business reason to retain it, we will take reasonable steps to securely destroy or de-identify it where appropriate.

16. Quality and correction of personal information

We take reasonable steps to ensure that personal information we collect, use and disclose is accurate, up to date, complete and relevant for the purpose for which it is being handled.

Please tell us if your information changes or if you believe information we hold about you is inaccurate, incomplete, out of date or misleading. Where appropriate and required, we will take reasonable steps to correct it.

17. How can you access your personal information?

You may request access to personal information Collins SBA holds about you. To make a request, contact us using the details below.

Before providing access, we may need to verify your identity and authority.

There are circumstances in which we may be permitted or required to refuse access, including where providing access would unreasonably affect another person's privacy or where another legal exception applies.

If we refuse access, we will provide reasons where required by law.

We will deal with access requests within a reasonable period and in accordance with applicable privacy law.

We may charge a reasonable fee for the costs of providing access where permitted, but we will not charge you simply for making an access request.

18. How can you request correction?

If you believe personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, please contact us.

We will consider the request and take reasonable steps to correct the information where appropriate.

If we decline to make a requested correction, we will provide reasons where required by law and explain any other options available to you.

We do not charge a fee to make a correction request.

19. Data breaches

Collins SBA maintains processes for responding to suspected or actual privacy and data-security incidents. Where an incident occurs, we will take appropriate steps to:

- contain the incident;
- assess what occurred;
- identify affected information and individuals;
- reduce or remediate potential harm;
- investigate the cause; and
- take corrective action.

The Notifiable Data Breaches scheme under the Privacy Act requires notification to affected individuals and the Office of the Australian Information Commissioner in certain circumstances where a data breach is likely to result in serious harm.

Where Collins SBA determines that notification is required, we will provide the required information as soon as practicable.

If you believe your personal information held by Collins SBA may have been compromised, please contact us promptly.

20. How can you make a privacy complaint?

If you have a question, concern or complaint about how Collins SBA has handled your personal information, please contact us in the first instance.

Please provide enough information for us to understand:

- the issue;
- the information concerned;
- what you believe has occurred; and
- the outcome you are seeking.

We will acknowledge your complaint and may ask for further information where necessary.

We will investigate privacy complaints fairly and seek to resolve them within a reasonable period having regard to the nature and complexity of the matter.

Contact Collins SBA

Privacy Officer: Collins SBA

Email: reception@collinssba.com.au

Post: GPO Box 1082, Hobart, Tasmania 7001

Phone: 1300 265 722

Website: www.collinssba.com.au

21. External complaints

If you are not satisfied with our response to a privacy complaint, you may be entitled to refer the matter to an external body.

Office of the Australian Information Commissioner

The Office of the Australian Information Commissioner (OAIC) deals with complaints concerning privacy under the Privacy Act. Information about privacy rights and making a complaint is available from the OAIC.

Website: www.oaic.gov.au

Phone: 1300 363 992

You will generally be expected to give Collins SBA an opportunity to deal with your complaint before asking the OAIC to investigate it.

Australian Financial Complaints Authority

Where your complaint relates to a financial service and falls within its jurisdiction, you may also be able to raise the matter with the Australian Financial Complaints Authority (AFCA).

Website: www.afca.org.au

Phone: 1800 931 678

Your financial services documents may contain additional information about the complaints process that applies to the financial services provided to you.

22. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in:

- law or regulation;
- our professional obligations;
- our business or services;
- technology;
- information-handling practices; or
- privacy and security risks.

The current version of this Privacy Policy will be available on the Collins SBA website.

23. Contact us

If you have a question about this policy, wish to request access or correction, or want to raise a privacy concern, please contact:

Privacy Officer: Collins SBA

Street address: 29 Murray Street, Hobart, Tasmania 7000

Postal address: GPO Box 1082, Hobart, Tasmania 7001

Phone: 1300 265 722

Email: reception@collinssba.com.au

Website: www.collinssba.com.au

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