

## **Your privacy is important to us.**

This document outlines our policy on handling the personal information that we, and our authorised representatives, collect and use. Where we name Finterliese Pty Ltd TAS Columbus Wealth Advisory, this includes Finterliese Pty Ltd TAS Columbus Wealth Advisory and its Authorised Representatives.

### Our commitment

At Finterliese Pty Ltd TAS Columbus Wealth Advisory (CWA) we recognise that your privacy is very important to you. We handle personal information provided by and about people every day. By personal information we mean information or an opinion about a person whose identity is apparent or can reasonably be ascertained.

The aim of CWA is both to support and to ensure that it complies with the Privacy Act 1988 (Privacy Act). CWA also seeks to comply with the Spam Act that is aimed at reducing the number of unsolicited electronic commercial messages that you receive.

The information set out below is largely a summary of our obligations under the Privacy Act, in particular the relevant privacy principles.

We believe that this Statement will address any potential concerns you may have about how personal information you provide CWA is collected, held, used, corrected, disclosed and transferred. You can obtain more information on request about the way we manage the personal information we hold. If you seek any further information please contact us in one of the ways set out below.

### Collection

In the course of our activities we collect and hold personal information.

Our main purposes for collecting that personal information include:

- to understand the financial circumstances of our client;
- to meet our legal obligations to make reasonable enquiries regarding clients prior to providing financial advice;
- to facilitate the provision of a referral service to clients who request such a service;
- to enable CWA to respond to queries from third parties, including without limitation financial institutions and government authorities.

We will only collect personal information from you that is necessary for one or more of our functions and activities.

We will only collect personal information from you by lawful and fair means, without being unreasonably intrusive. At or before the time we collect personal information from you we will take reasonable steps to inform you why we are collecting that personal information, who else we might

disclose that personal information to and what will happen if you do not provide personal information to us.

Where reasonable and practicable, we will only collect personal information about you, from you.

Wherever it is lawful and practicable, we will give you the option of not identifying yourself or not providing personal information when entering transactions with us. However, failure to provide full and complete information we request may mean that we are unable to provide services to you fully and properly.

Once we hold personal information we will take reasonable steps to keep it accurate, complete and up-to-date.

If you provide personal information to use about someone else, you must ensure that you are entitled to disclose that information to us and that, without us taking any further steps required by privacy laws, we may collect, use and disclose such information for the purposes described in this Statement.

#### Use and disclosure

We will only use your personal information for the main purpose we told you it was needed for, except where you consent to us using that personal information for another purpose, where the other purpose is related to the main purpose and you would reasonably expect us to use the personal information for that other purpose, or where it is permitted or required by law, or we reasonably believe it is necessary on health or public safety grounds to use the personal information for another purpose.

In order to fulfil the purposes set out above we may provide access to your personal information to third parties with whom we have a business relationship.

You accept that not all recipients of your information may have privacy policies equivalent to CWA's and you consent to the disclosure of your personal information for those purposes.

There are some circumstances where by law we are required to disclose your personal information, including to Courts, Tribunals or law enforcement agencies.

In relation to direct marketing, where practicable we will seek your consent before we use your personal information for this purpose. You may tell us at any time you do not wish to receive any further direct marketing materials – if you do, we will stop sending you such materials.

In accordance with the Spam Act, should you wish to unsubscribe from commercial electronic messages from CWA, all future commercial electronic messages from CWA will enable you to

unsubscribe from that particular type of electronic message from CWA and this can be done at any time. If you do not unsubscribe, CWA will continue to send you relevant information of the types described above.

CWA may also use messaging methods other than email.

#### Access and correction

If you ask, we will tell you what personal information we hold about you, and what we do with it. We will facilitate access to you by allowing an inspection of your personal information in person, or by providing copies or a summary of relevant documents, depending on what is most appropriate in the circumstances, following receipt of your request. Any charge we make for providing access will be reasonable.

If you can show us that the personal information is inaccurate, we will take reasonable steps to correct it. Note that we need not provide access to personal information in several types of situation, for example where a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonably interfere with another person's privacy, or be a breach of the law. If we refuse access we will advise you of our reasons for doing so.

#### Security

We will protect personal information from misuse and loss, and destroy or permanently de-identify personal information we no longer need.

#### Online Publications

This part specifically relates to articles, blogs and any other information published online by CWA. We must adhere to this Statement and any other relevant policy, statement or document, when making use of online publications and resources. Where possible, CWA will make use of pseudonyms when publishing articles, blogs and any other online material.

#### Identifiers

We will not adopt as our own any identifiers that you may provide to us such as TFNs, Medicare numbers etc.

#### Third party websites

Our websites may contain links to other websites, including the websites of our commercial partners.

When this occurs be sure to check the privacy policy of those websites as we are not responsible for privacy practices of those other parties.

### Overseas disclosure of Personal Information

We may from time to time transfer personal information outside Australia in accordance with the Privacy Act to countries whose privacy laws do not provide the same level of protection as Australia's privacy laws. We may use cloud storage and IT servers that are located offshore.

By providing us with your personal information, you consent to us disclosing your information to entities located outside Australia and, when permitted by law to do so, on the basis that we are not required to take such steps as are reasonable in the circumstances to ensure that any overseas recipient complies with Australian privacy laws in relation to your information.

### Complaints resolution

We are committed to providing individuals, and other parties whose personal information we hold, a fair and responsible system for the handling of their complaints.

If at any time you have any complaints in relation to privacy, please contact our Privacy Officer at one of the points referred to below. We will seek to address any concerns that you have through our complaints handling processes, but if you wish to take matters further you may refer your concerns to the Office of the Australian Information Commissioner.

If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Website: [www.afca.org.au](http://www.afca.org.au)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

### Changes to this Statement

We are constantly reviewing our statements and policies in an attempt to keep up to date with market expectations and legal developments. Subsequently, we may change this Statement from time to time as the need arises.

A copy of this Privacy Policy will be available on our website and will also be available on request.



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### Contacts

If you seek any further information from CWA about this Statement or our privacy policy please contact us at: [info@columbuswealth.com.au](mailto:info@columbuswealth.com.au)

Finterliese Pty Ltd TAS Columbus Wealth Advisory – 114 Auburn Road, Hawthorn VIC 3122 Tel: 03 9935 9202 | 0432 692 879

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au)

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