



# PRIVACY POLICY

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Bona Fide Advice Pty Ltd (ABN 55619001197)  
Australian Financial Services License No: 524359

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## Who we are?

a Fide Advice Pty Ltd (AFSL Number:524359, ABN: 55619001197) and its Authorised Representatives.

As financial service provider we are subject to certain legislative and regulatory requirements under S961B of the Corporation Act 2001 and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Bona Fide Advice Pty Ltd is committed to providing highest level of client services and genuine professionalism. We recognise that your privacy is very important to you so that we are being open and transparent on how we manage personal information.

The Policy sets out how we manage your Personal Information. We respect the privacy of any Personal Information we collect about you and we are committed to ensuring that this is handled in accordance with the provisions of the Privacy Act 1988, the Australian Privacy Principles and any other applicable privacy related laws.

Where there is specific legislation, this will generally govern how we use Personal Information despite the provisions of the Privacy Act 1988. For example, for certain Financial Services, we are required to collect your tax file number and provide that information to the Australian Taxation Office or superannuation or investment product providers.

This Privacy Policy discloses the purpose and how the personal information you provide to us and our Representatives is collected, used, held, disclosed and disseminated.

We encourage you to check our website regularly for any updates to our Privacy Policy: [www.bonafideadvice.com.au](http://www.bonafideadvice.com.au).



## Collection of Personal Information:

There are two types of personal information that we collect at Bona Fide Advice:

- **Personal Information:** is information that could be used to identify an individual or to establish their identity. Such as:
  - Name/Last name
  - Date of birth
  - Contact details
  - Gender and marital status
  - Family and living arrangements
  - Citizenship or nationality
  - Social security benefits
  - Racial or ethnic origin
  - Political opinions
  - Membership of a political association
  - Religious beliefs or affiliations
  - Philosophical beliefs
  - Membership of a professional or trade association
  - Membership of a trade union
  - Sexual orientation or practices
  - Criminal record
  - Tax File Number (TFN)
  - Health information
  - Bank account(s)
  - Superannuation account(s)
  - Insurance details
  - General insurance details
  - Employment details and employment history
  - Information about or statements detailing a person's assets, income and liabilities
  
- **Sensitive information:** is subject to greater restrictions, storage, use and disclosure of sensitive information. Such as:
  - Racial or ethnic origin
  - Political opinions
  - Membership of a political association, profession or trade association, or trade union
  - Religion
  - Sexual orientation or practices
  - Criminal records
  - Health information

## How we collect personal information

Bona Fide Advice collects personal information directly from you or from third parties, such as your employer, super funds, Insurance providers, accountant, mortgage broker or solicitor. once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party, however, it may effect our ability to provide you with our services and advice.

We may need you to provide us with information regarding your family situation, your partner, dependants, beneficiaries, and children. This information will only be gathered where it is necessary to provide you services, such as financial advice.

Where this information is reasonably required from you, and you willingly provide it, we expect and assume that you have their consent to provide this information to us. In these circumstances, you need to ensure that they are aware:

- That you have provided their personal information to us
  - That they understand who we are and how they can contact us
  - That they may access the Personal Information that we hold about them
  - Of the purposes for which you provided their Personal Information to us
  - That their Personal Information will be handled in accordance with this Policy, and
- That they can refer to this Policy for further information

## How we use personal information:

Primary purpose of using your personal information is to provide advice to you as well as reviewing your ongoing needs, we , may also use the information that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed. These related secondary purposes are things such as: enhancing our customer service and product options; communicating with you regarding the products and services you have with us; handling your complaints; providing you with ongoing educational information including newsletters; and providing you with marketing material that we believe may be relevant to your financial needs and circumstances. Where the secondary purpose is unrelated to the primary purpose for which you have sought our services, we will ask for your consent. You may provide your consent in writing, or via telephone.

If we determine that we have obtained unsolicited personal information from you or information that we don't need to provide our services to you we will contact you and return the information or otherwise remove it from our files and records.

## Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

## Marketing Material

From time to time, we may provide you with direct marketing material. If, at any time, you do not wish to receive this information any further, you may contact us with this request. Please allow us up to 60 days for us to fully implement your opt out request from marketing material. We maintain a Register for those individuals not wanting direct marketing material.

The ability to 'opt-out' does not include important disclosure documents and letters your Adviser may send to you that include portfolio updates on your current investments, an offer of review, education material or other communications required to be provided as part of an Adviser's general obligations.

## When we may disclose your personal information:

We disclose personal information to third parties in one of more of the following circumstances:

1. the disclosure is necessary for the provision of one of our products or services;
2. the disclosure is necessary for a secondary purpose as described above; and
3. the individual has consented to the disclosure of the information to a third party, including:
  - superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service
  - Service providers and specialist Advisers to us who have been contracted to provide Bona Fide Advice with administrative, financial, insurance, accounting, legal, information technology, compliance, research, or other services.
  - paraplanning contractors or temporary staff to handle workloads during peak periods.
  - mailing houses.
  - Credit reporting or reference agencies or insurance investigators.
  - your professional advisers, including your solicitor or accountant as authorised by you.
  - another Authorised Representative of Bona Fide Advice if necessary.
  - a new owner of our business that will require the transfer of your personal information it can be a new Australian Financial Service License holder
  - Government and regulatory authorities, as required or authorised by law.
  - AUSTRAC, the government agency who oversees Anti-Money Laundering and Counter Terrorism Financing. Before we arrange the provision of products or services for you, we are required to validate your identity. We will request and copy some personal documents for that purpose. We are also required to report details of entities and certain

transactions where we hold reasonable suspicion of reportable suspect matters.

- Product or service providers who have an obligation to disclose information to the Australian Tax Office (ATO) where the ATO has agreements to share information with overseas tax authorities.
- External dispute resolution bodies such as the Australian Financial Complaints Authority who would handle your dispute.

Our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Capstone.

## How We Store and Secure Your Personal Information

We keep your personal information in your client files or electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements.

Personal information is treated as confidential information and sensitive information is treated as highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be securely destroyed.

## Do We Disclose Your Personal Information to Overseas Recipients

In the process of providing you with financial services, we may engage in the services of organisations based overseas, or organisations based in Australia that utilise services themselves from overseas. Some of the organisations that we disclose your personal information in outside Australia are for the purpose of storage of your personal data via cloud storage services, such as Microsoft or Google. Some of our outsourced service providers including their contractors or employees such as Paraplanning, accounting or IT Help desk services (e.g. Microsoft help desk) may be located outside Australia, although their main office is located in Australia. We assess the overseas service providers to make sure they treat your personal information in alignment with Australian Privacy Principles and any relevant privacy laws and regulations applicable to their jurisdiction.

## Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information.

Please send your request to your financial adviser. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious.
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings.
- providing access would be unlawful.
- denying access is required or authorised by or under law.
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

## Ensure your Personal Information is Correct

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information; and
- update us with any changes to your personal information as soon as possible.

If you provide inaccurate or incomplete information, we may not be able to provide you with the products or services you are seeking.

## Enquiries and Complaints Resolutions

Please contact your adviser or our office if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

The OAIC can be contacted at:  
Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Phone: 1300 363 992

