BONA FIDE
advice pty ltd

# PRIVACY POLICY

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Bona Fide Advice Pty Ltd (ABN 55619001197)

Australian Financial Services Licence number: 524359

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## Who we are

This policy applies to Bona Fide Advice Pty Ltd (AFSL 524359, ABN 55619001197) and its authorised representatives. In this policy, "we", "us" and "our" mean Bona Fide Advice Pty Ltd and its authorised representatives.

As a financial services provider, we are subject to legal and regulatory requirements, including the Corporations Act 2001 and the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

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

This 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 handling it in accordance with the Privacy Act 1988, the Australian Privacy Principles and any other applicable privacy laws.

Where specific legislation applies, it will generally govern how we use personal information, despite the Privacy Act 1988. For example, for certain financial services we are required to collect your tax file number and provide it to the Australian Taxation Office, or to superannuation or investment product providers.

This policy explains why we collect your personal information, and how we and our representatives collect, use, hold and disclose it.

We encourage you to check our website regularly for updates to this policy: www.bonafideadvice.com.au.

## Collection of personal information

We collect two types of information at Bona Fide Advice: personal information and sensitive information.

### Personal information

Personal information is information that could be used to identify an individual or to establish their identity. For example:

- First name and surname
- Date of birth
- Contact details
- Gender and marital status
- Family and living arrangements
- Citizenship or nationality
- Social security benefits
- Tax file number
- Bank accounts

- Superannuation accounts
- Insurance details, including general insurance
- Employment details and history
- Information or statements about a person's assets, income and liabilities

### Sensitive information

Sensitive information is a type of personal information that is subject to greater restrictions on how it can be stored, used and disclosed. For example:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Membership of a professional or trade association, or a trade union
- Religious or philosophical beliefs
- Sexual orientation or practices
- Criminal record
- Health information

## How we collect personal information

We collect personal information directly from you, or from third parties such as your employer, super funds, insurance providers, accountant, mortgage broker or solicitor. We do this only once you have authorised us. You have the right to refuse to authorise us to collect information from a third party. However, this may affect our ability to provide you with our services and advice.

We may need you to provide information about your family situation, including your partner, dependants, beneficiaries and children. We gather this information only where it is necessary to provide you with services, such as financial advice.

Where this information is reasonably required and you willingly provide it, we expect and assume that those individuals have consented to you providing it to us. In these circumstances, you need to make sure that they know:

- that you have provided their personal information to us;
- who we are and how they can contact us;
- that they can access the personal information we hold about them;
- 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

The primary purpose of using your personal information is to provide advice to you and to review your ongoing needs. We may also use your personal information for related secondary purposes that you would reasonably expect. These include:

- enhancing our customer service and product options;
- communicating with you about 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 a secondary purpose is unrelated to the primary purpose for which you sought our services, we will ask for your consent. You may give your consent in writing or by telephone.

If we determine that we have obtained unsolicited personal information from you, or information that we do not 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, you can telephone us to ask for our postal address.

## Marketing material

From time to time, we may provide you with direct marketing material. If you do not wish to receive it any further, you may contact us with this request. Please allow us up to 60 days to fully implement your request. We maintain a register of individuals who do not want direct marketing material.

The ability to opt out does not include important disclosure documents and letters that your adviser may send you. These include portfolio updates on your current investments, an offer of review, education material and other communications that an adviser is required to provide as part of their general obligations.

## When we may disclose your personal information

We may disclose personal information to third parties in one or 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;
3. you have consented to the disclosure; or
4. the disclosure is required or authorised by law.

### Disclosures to provide our services, or with your consent

- Superannuation fund trustees, insurance providers, fund managers and other product providers, to manage or administer your product or service
- Service providers and specialist advisers contracted to provide Bona Fide Advice with administrative, financial, insurance, accounting, legal, information technology, compliance, research or other services
- Paraplanning contractors or temporary staff who handle workloads during peak periods
- Mailing houses
- Credit reporting or reference agencies, and 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, where the transfer of your personal information is required. The new owner may be a new Australian financial services licence holder

### Disclosures required or authorised by law

- Government and regulatory authorities, as required or authorised by law
- AUSTRAC, the government agency that oversees anti-money laundering and counter-terrorism financing. Before we arrange products or services for you, we are required to verify your identity, and 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 have a reasonable suspicion of reportable suspicious matters
- Product or service providers who must disclose information to the Australian Taxation Office, where the Australian Taxation Office has agreements to share information with overseas tax authorities
- External dispute resolution bodies, such as the Australian Financial Complaints Authority, that would handle your dispute

Our employees and the outsourcing companies and contractors we use must respect the confidentiality of any personal information held by Bona Fide Advice.

## How we store and secure your personal information

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

We treat personal information as confidential, and sensitive information as highly confidential.

We are legally required to keep all personal information and records for 7 years. If you cease to be a client, we will keep your personal information, on or off site, in a secure manner for 7 years. After that, we will securely destroy it.

## Do we disclose your personal information to overseas recipients?

In the process of providing you with financial services, we may use the services of organisations based overseas, or of organisations based in Australia that use services from overseas.

We may disclose your personal information to organisations outside Australia to store your personal data in cloud storage services, such as Microsoft or Google. Some of our outsourced service providers, including their contractors or employees, may also be located outside Australia, although their main office is in Australia. Examples include paraplanning, accounting and IT help desk services (for example, the Microsoft help desk).

We assess overseas service providers to make sure they treat your personal information in line with the Australian Privacy Principles and any privacy laws that apply in their country.

## Use of computer programs, artificial intelligence and automated decisions

From 10 December 2026, we must tell you when we use computer programs to make, or to help us make, decisions that could significantly affect you. This section explains how we do that. It covers the kinds of personal information these programs use and the kinds of decisions they support.

In this policy, a computer program includes everyday software, rule-based tools, and tools that use artificial intelligence, such as programs that draft or summarise text. Where we are unsure whether a tool is covered, we take a cautious approach and tell you about it.

### The kinds of personal information these programs use

- Your name, contact details, date of birth and age.
- Your family situation and dependants.
- Your employment, income, expenses, assets and liabilities.
- Details of your superannuation, investment and insurance products.
- Your goals, objectives, attitude to risk and financial needs.
- Your tax file number, where we are allowed to collect it and need it to provide a service.
- Identity documents we collect to confirm who you are.
- Health information, where it is needed to give you insurance advice. We treat this as sensitive information.
- Records of our meetings, calls and emails with you.

### Decisions made only by a computer program

At the date of this policy, we do not make any decision that significantly affects you using only a computer program. Your adviser reviews and makes the final decision on any advice we give you.

### Decisions where a computer program helps us

We use computer programs to help us do things that are closely connected to our decisions and recommendations. These include:

- Preparing and drafting advice documents, review reports and letters. Your adviser checks these before they are given to you.
- Modelling your cash flow, tax, retirement income, insurance needs and net assets, to help us decide which strategies to recommend.
- Scoring risk profile questionnaires, to help us decide which investment options suit your attitude to risk.
- Comparing superannuation, investment and insurance products, to help us decide which ones to recommend.
- Confirming your identity and meeting our legal checks, such as those required under anti-money laundering law.
- Keeping client records and working out when a client is due for a review or follow-up.

### Human oversight

A qualified person at our firm stays responsible for our advice and decisions. We do not rely on the output of a computer program without checking it first, and we will review and correct any output that looks wrong.

### Products and services from other providers

Super funds, insurers, platforms and other product providers may use their own computer programs to make decisions about you, for example when assessing an insurance application. These providers are responsible for explaining this in their own privacy policies, and we encourage you to read them.

### Asking us questions

If you would like to know more about how we use computer programs, or you would like a decision about you to be reviewed, please contact your adviser or our office using the details at the start of this policy. If you are not happy with our response, you can make a complaint as set out under Enquiries and complaints below.

We will update this section when the way we use computer programs changes.

## Access to your personal information

You have a right to access your personal information, subject to certain exceptions allowed by law. For security reasons, we ask that you make your request for access in writing, and we will give you 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 apply for providing access, we will tell you what they are before we provide the information.

Some exceptions exist where we will not give you access to your personal information. These are where:

- 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 relates 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; or
- 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.

If we refuse you access to your personal information, we will give you a written explanation for that refusal.

## Keeping your personal information correct

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

- tell 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

Please contact your adviser or our office if you wish to complain about any breach or potential breach of your privacy rights. We will respond to your complaint 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 (OAIC).

The OAIC can be contacted at:

Office of the Australian Information Commissioner

GPO Box 5288, Sydney NSW 2001

Email: enquiries@oaic.gov.au

Phone: 1300 363 992