

# Privacy Policy

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Synchronised Business Services Pty Ltd ('Synchron') is committed to ensuring the confidentiality of your personal information in accordance with the Privacy Act 1988 and the Australian Privacy Principles (APPs).

## 1 Why we collect information

We collect information for a number of reasons including:

- To deliver products or services to you;
- To better understand your requirements and preferences;
- To improve our service to you;
- Preparing your financial plan;
- To provide financial advice to you;
- Establish and manage your investments and accounts;
- Implement your investment and insurance instructions;
- Process any contributions, transfers or payments of benefits;
- Monitor and report the investment performance of your account;
- Reviewing your financial plan;
- To provide you with future products and services you may be interested in; and
- To fulfil our regulatory and legislative requirements.

## 2 How we collect this information

Information is generally collected:

- When we ascertain from you the facts necessary to make a fair and reasonable assessment of their insurance or financial needs and objectives ("Fact Find");
- When you complete an application form for insurance;
- When you complete an application form for an insurance claim;
- When you complete an application form for investments;
- When you complete an application form for superannuation
- When you complete an application form to increase their level of insurance; or
- When you complete supplementary medical or financial questionnaires.

If you are unable to provide us with your personal information, we may not be able to organise for you to receive a product or service. You can nominate an Authorised Representative to access your personal information. This authority can be revoked at any time.

Synchron may collect personal information from a third party (such as another Financial Adviser, Product Provider or Medical Practitioner) or a publicly available source but only if you have consented to the collection or it can reasonably be expected that consent has been provided by you.

### 2.1 Privacy on the internet

Synchron and our Authorised Representatives may use websites to collect personal information from you. Synchron and Authorised Representatives may receive a password and a personal identification number to access details online. This information will be kept confidential and secure at all times.

### **2.1.1 Cookies**

These are text files stored on a person's computer when they visit a website. Their sole purpose is to identify users and possibly prepare customised web pages or to save site login information. Synchron and our Authorised Representatives may use cookies on our websites.

Cookies can be purged from your browser after every use. This is generally a very simple procedure. Please refer to your browser's help file for more information.

Although Synchron and our Authorised Representatives strive to ensure your security, no data transmission over the internet can be guaranteed to be completely secure.

### **2.1.2 Links to third party websites**

Synchron and our Authorised Representatives may provide links on our web pages to external industry parties. The content and views expressed on these third party websites are not the responsibility of Synchron or our Authorised Representatives.

## **2.2 Tax File Numbers**

Synchron and our Authorised Representatives may need to collect your tax file number to provide you with a product or a service (for example, managed fund investments and superannuation products). However this information will be kept securely and destroyed or we will permanently de-identify TFN information where it is no longer required.

## **3 What we collect**

The personal information generally collected includes:

- Name;
- Address;
- Phone number;
- Email address;
- Age details;
- Occupation;
- Financial details;
- Health Details;
- Transaction information;
- Bank account details;
- Tax File Number;
- Income details from employers;
- Details of dependents;
- Beneficiary details.

Where the information is deemed to be sensitive, for example, the collection of health information, there will be a higher level of privacy protection afforded.

## **4 Disclosure of personal information**

There may be cases where Synchron and our Authorised Representatives will need to disclose your personal information to third parties. This is generally to assist us in providing you with a product or service. This may include:

- Doctors, medical services or other organisation to help assist with the collection of information for an insurance application or a claim;

- Any fund (investment administrator or superannuation trustee) to which your benefit is transferred, created or rolled over;
- Your employer where it relates to your employer sponsored superannuation arrangement;
- Your personal representative or any other person who may be entitled to receive your death benefit;
- An external dispute resolution service, insurer or legal representative (where required or applicable);
- The policy owner (where you are the life insurer but not the owner);
- Exchange of information with authorised financial institutions to confirm bank account details for payment;
- Service providers that maintain, review and develop our business systems;
- Regulatory bodies (including the Australian Securities and Investment Commission) as required by law.

If required by law or a regulatory body to do so, Synchron and our Authorised Representatives will comply and provide the appropriate body with the required information.

#### **4.1 How we hold personal information**

Your hard copy and electronic records are stored in secure buildings and internal information systems.

##### **4.1.1 Protecting personal information**

We protect your information by way of staff training, secure storage and system security.

Synchron will take reasonable steps to destroy or de-identify the personal information we hold once it is no longer needed for any purpose for which it may be used or disclosed.

## **5 Collection of sensitive information**

Where you apply for certain life risk products (such as life insurance, income protection insurance, trauma insurance, total and permanent disability insurance) it will be necessary for Synchron and our Authorised Representatives to collect sensitive information about your health. This information will only be collected when you give consent by completing the product's application form. The information will be sourced by the Life Insurance company from you, your medical professional and by other medical professionals where medical tests may have been performed. Due to confidentiality, it is sometimes the case whereby Synchron or the Authorised Representative may not be made fully aware of the medical circumstances by the Life Insurance Company.

Unless required by law, we will only collect sensitive information with your consent.

## **6 Where we operate**

Synchron operates in the following countries outside of Australia:

- The Philippines.

Your personal information may be shared with Synchron employees in that country.

## **7 Sending personal information overseas**

If we send your personal information to overseas recipients, will ensure that appropriate data handling and security measures are in place.

Authorised Representatives of Synchron may enter their own outsourcing arrangements and send your information to countries other than those listed above. Those arrangements will be disclosed to you separately by your financial adviser.

## **8 Sale of an Authorised Representative's business**

In the event that an Authorised Representative proposes to sell their business, or if an Authorised Representative is no longer eligible to provide advice, we may disclose some of your personal and sensitive information to potential

purchasers for the purpose of conducting due diligence investigations. Any such disclosures will be made in the strictest confidence and conditional that no personal information will be used or disclosed by them. In the event of a sale being effected, Synchron or our Authorised Representatives may transfer your personal information to the purchaser of the business. In this instance, you will be provided a notice by mail to your last known mailing address that such a transfer will be taking place. You will then have the opportunity to object to the transfer within 14 days of the date of the notice.

## **9 Access to personal information**

You are able to access any personal information that is held by Synchron or our Authorised Representatives subject to limited exceptions or required by law. The following factors will be considered:

- The information is related to a commercially sensitive decision making process;
- Access would be unlawful;
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice an investigation of possible unlawful activity.

To access the information, you will need to contact the Privacy Officer as detailed in this policy.

You may be charged a small fee applicable to the collection and provision of your personal information but will be notified of this fee prior to processing their request. The Synchron Privacy Officer will be able to advise you how long it will take to provide the information. Generally however, you will receive the requested information within 14 days of the request.

If you believe that the personal information we hold about you is incorrect, you have a right to request your personal information be corrected.

Where we are unable to provide you with the information you have requested or correct your information, we will inform you and explain the reasons why.

### **7.1 Anonymity and pseudonymity**

You may remain anonymous or use a pseudonym when dealing with us. However, it may not be possible for us to assist you with your request if you wish to use a pseudonym or remain anonymous.

## **10 Privacy Officer**

Synchron has nominated a Privacy Officer to handle any queries or issues related to Privacy. This person has been nominated at a senior level and has access to the Board.

Name: John Prossor  
Phone: 03 9328 3900  
Email: [j.prossor@synchron.net.au](mailto:j.prossor@synchron.net.au)  
Post: PO Box 438  
North Melbourne VIC 3051

We take your privacy seriously and any complaints you may have will be addressed through our complaints handling process. All complaints will be given fair consideration and we will aim to resolve them within 45 days. We encourage you to submit your complaint to the Privacy Officer (details above) either via email to post. Where it is found that we are unable to finalise the investigation of your complaint within 45 days, we will contact you to request an extension.

If you believe you did not receive a satisfactory resolution to your concern, you may contact the Office of the Australian Information Commissioner. You are able to do so by:

- Visiting [www.oaic.gov.au](http://www.oaic.gov.au) and submitting an online form;
- Obtaining a hard copy form at [www.oaic.gov.au/about-us/contact-us-page](http://www.oaic.gov.au/about-us/contact-us-page);
- Phone: 1300 363 992;
- Fax: 02 9284 9666;
- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

The Office of the Australian Information Commissioner is also available via Social Media outlets. Please refer to the Contact Us page at [www.oaic.gov.au/about-us/contact-us-page](http://www.oaic.gov.au/about-us/contact-us-page).