



STATEMENT OF PRIVACY POLICY

WHAT IS THE BLUEWATER FINANCIAL ADVISORS PTY LTD COMMITMENT?

At Bluewater Financial Advisors 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.

We are bound by, and committed to supporting, the National Privacy Principles (NPPs) set out in the Privacy Amendment (Private Sector) Act 2000. Our aim is to both support, and ensure that we comply with, the NPPs that form the basis of laws introduced to strengthen privacy protection for the general public. The information set out below is largely a summary of our obligations under the NPPs.

We believe that this Statement will address any potential concerns you may have about how personal information you provide to the Bluewater Financial Advisors 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.

WHICH OF MY INFORMATION DOES BLUEWATER FINANCIAL ADVISORS COLLECT & WHY?

Client details are collected for the purpose of determining what is the most appropriate financial advice for that client and which of the many available strategies, including the selection of products, services and facilities is optimal for the client's use.

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, such as when you complete a client Fact Finder, application form, insurance proposal, finance proposal, membership application, registration form or questionnaire etc.

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.

HOW BLUEWATER FINANCIAL ADVISORS USES THE INFORMATION & WHAT SHOULD I KNOW?

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, for example those who maintain and update our database, who assist with mail-outs, who arrange, participate in and sponsor conferences and who deliver educational and other services. You accept that not all recipients of your information may have privacy policies equivalent to that of Bluewater Financial Advisors Pty Ltd and you consent to the disclosure of your personal information for those purposes.

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.

WHAT IF I WISH TO VIEW OR CHANGE MY INFORMATION?

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.

DOES BLUEWATER FINANCIAL ADVISORS PROTECT MY INFORMATION?

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

HOW DOES THE BLUEWATER FINANCIAL ADVISORS WEBSITE COLLECT MY INFORMATION?

When you visit our website, details may be recorded about your visit, such as time and date, your server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and contains information enabling our website to recognise your browser. If you do not wish to use cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

HOW DO YOU IDENTIFY ME?

As you would already know the government departments have a variety of ways to identify us as members of Australia. Some of those ways include Tax File Numbers (TFNs), Australian Company Numbers (ACNs) and Medicare Numbers. This information filing system was created by those government departments specifically for their own needs and purposes. We do not consider it appropriate to use those government identifiers with the Bluewater Financial Advisors business and consider the use of such identifiers can cause confusion and, in some circumstances, a breach of your privacy. As such we have our own identifiers to recognise our clients and our professional members.

IS MY INFORMATION SENT OVERSEAS OR SHARED THROUGH THE INTERNET?

We will not send any personal information about you overseas unless you consent to this, or we reasonably believe that the other country has privacy laws substantially similar to our own, or we provide the information in other circumstances giving like protection.

Our website contains a number of 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.

WHAT IF I AM NOT HAPPY ABOUT THE HANDLING OF MY INFORMATION?

We are committed to providing members, 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 Federal Privacy Commission.

CONTACT US

If you seek any further information from Bluewater Financial Advisors Pty Ltd about this Statement or our privacy policy generally please contact our Privacy Officer at one of the reference points below:

- Bluewater Financial Advisors Pty Ltd Compliance Officer – Robert Stanoff
- compliance@bluewaterfinancial.com.au
- GPO Box 4523 Sydney NSW 2001
- **Telephone:** 1300 799 101
- **Facsimile:** 1300 799 212

ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>