

At Bombora Advice Pty Ltd your privacy is important to us. Since inception, the Privacy laws in Australia have governed the way we are able to collect, maintain, use and disclose your personal information. We comply with these laws.

This policy explains how we manage your personal information including:

- The types of information we hold about you and how we use that information
- Your privacy rights, together with your general rights and our obligations
- Our internal policies in relation to how we collect, maintain, use and disclose any of your personal information.

We encourage you to check our web site regularly for any updates to this Privacy policy.

Please go to www.bomboraadvice.com.au

Other Privacy Documents

When you see one of our advisers and you apply for a product or service as a result of a recommendation made by them, the application forms will include notices about your privacy and will ask for your consent. These privacy notices will specify in greater detail how any information relating to you may be used or disclosed by that product or service provider.

When you apply for, or use, one of these products or services you are consenting to us collecting, maintaining, using and disclosing personal information about you (provided by you or another person) in accordance with the privacy statements found in those application forms, any agreements you sign and this privacy brochure.

What Type of Information Does Bombora Hold

The type of information we ask from you will depend upon the type of product or service requested by you. Generally, we will keep a record of one or more of the following types of information.

Identifying information

- This will include information such as your name, address and date of birth. Typically, this information will identify and substantiate who you are. We are required to identify who you are to comply with some Australian Laws.

Personal information

- If you are making a personal insurance application, we will be required to collect personal information about you relating to your health, your income, your occupation and other related facts. This information will be required for the insurance company to assess your risk application.

Factual Information

- This information may relate to your employment, income and bank account details

Transactional information

- This information may relate to the bank account or credit card details, contributions to be made and dates for periodic payments to be scheduled

All information that is captured as part of this process is information that is required for us to evaluate your position or to include on the application forms for recommended products or services. Should you choose not to provide some, or all of this information, the product and service providers we have recommended may not be able accept your application.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

How Do We Collect Your Information

We generally collect personal information directly from you. For example, personal information will be collected through our application process, forms and other interactions with you in the course of providing you with our services, including when you visit our website, call or send us correspondence.

In certain circumstances it may be necessary to collect information from your accountant, lawyer or bank where it is required to provide a product or service to you. This information will only be collected when you have provided us with your consent to do so.

We may also collect information about you from other members of Bombora Advice Pty Ltd or from publicly available sources.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exemptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise or an exemption in the Privacy Act applies.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

How Do We Collect Information from Our Website

We may collect and hold information about you from our web site when you:

- Access our services from the Bombora Advice web site
- Complete on-line information about yourself and
- You provide us with your email address.

We may also collect and retain information about on-line visitors to our web site, the services they have been interested in and the types of follow up information they have requested. This information will generally be of a statistical nature and may be used for any of our ongoing web site enhancement activities. You should be aware that cookies may be used to access relevant information on any visitor activity on our web site, but any information sourced in this manner does not identify individuals.

Apart from this statistical information, we do not collect any other information about you from our web site unless you provide this information to us.

How May We Use Your Information

Generally, we will use your personal information to:

- Help us to formulate our personal advice recommendations so that they are provided in your best interests
- Help us to process the establishment of any products or services we have recommended
- Professionally manage and administer your financial affairs, including meeting any reporting obligations we may have under Australian laws.
- Ensure that our systems and processes are meeting our expectations of professionalism and efficiency
- Ensure our technology is working correctly in supporting our business and delivering on our service promises to you

If you acquire products or services from financial product providers as a result of our recommendations, these product and service providers may use your personal information to analyse their own offerings and to assess the relevance of their offerings in the market place.

Who might we disclose Personal Information To?

We may disclose personal information to:

- a related entity
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisers;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers; and
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy.

What Rights Do We Have to Disclose Personal Information

Generally, we must obtain consent from you before we can disclose any information about you to a third party.

You can provide your consent to us in writing or by telephone, or it may be implied by your conduct. In certain circumstances, the law requires us to disclose certain information about you e.g. The Family Law Act 1995. In these circumstances, we will provide this information when required to do so to comply with Australian law.

Depending on the product or services we provide to you, it may be necessary to disclose your personal information to:

- An external disputes resolution service e.g. the Australian Financial Complaints Authority (AFCA) when an investigation is being held.
- Anyone who holds amounts of money on your behalf which is to be transferred to or from us.
- Parties who may be interested in acquiring part, or all of, our business
- Where we are required to do so under Australian law
- External service providers e.g. financial institutions you nominate etc
- Organisations undertaking verification services
- Third party service providers retained by us to assist us in our business e.g. external auditors, mail houses and compliance personnel.

Your information may be disclosed to external service suppliers both here and overseas who supply administrative, financial and other services to assist your adviser and Bombora Advice in providing financial advice services to you. The countries where these service providers are located:

- South Africa
- Philippines

Use of Information by an Insurance Company

If we recommend that you purchase an insurance policy the insurance company may use the personal information supplied by you in accordance with their own privacy policy as disclosed in their Product Disclosure Statement.

You may be able to review the relevant insurance company's privacy policy through the internet home page for that company.

How we Protect the Security of Your Information

We take all reasonable steps to protect your personal information from loss, misuse and unauthorised access.

Your personal information is stored in secure office premises in locked cabinets or in electronic databases requiring password access. In addition, we require that all internal staff maintain the highest levels of client confidentiality at all times.

If we no longer require your personal information, we will either destroy or de identify that personal information as soon as the law permits.

Changes to Our Privacy Policy

We retain the right to alter our Privacy Policy from time to time, as required. Not all of these alterations require your consent, e.g. changing from paper-based office processes to electronic based office processes, but we will notify you of any privacy policy changes that require your consent, before doing so.

What are Your Rights

In certain circumstances, you are formally required under Australian law to disclose personal information about yourself e.g. when applying for an insurance contract. Other than these circumstances, you may choose not to disclose your personal information.

However, if you do choose to withhold personal information from us, we may not be able to fully process application forms nor will we be able to provide you with the most appropriate recommendations.

Where we do collect personal information from you about another individual, e.g. your beneficiary under an insurance contract, we ask that you make this individual aware of this fact and of this Bombora Advice Privacy Policy.

Marketing Opt Out

If you do not want to receive ongoing information from us or from some of our service providers, you need to tell us. We will assume that you have provided us with your marketing consent unless you tell us otherwise.

You can opt out of receiving our marketing information at any time. To do so, you will need to speak with your Bombora Advice adviser and request to be removed from our marketing program.

Access to Your Information

You may request access to the personal information we hold about you at any time. We will endeavour to process your request in a timely manner, usually within 20 business days depending upon the nature of your request. In certain circumstances, some of your personal information may need to be recalled from an archive or from other secure off-site locations.

We will not charge you for requesting access to your personal information, but we do reserve the right to recover any administrative costs to process your request e.g. photocopying, administrative time etc.

Under certain circumstances, we do not have to provide you with access to your personal information e.g. matters under legal consideration. In these circumstances, we will provide you with reasons why we cannot provide you with this access so that you are clear about our position.

Accurate Information

At all times we will attempt to ensure that all personal information we hold about you is accurate and that it reflects your current position, however we are dependent upon you notifying us about relevant changes to your personal information.

At any time you can request that we update, or correct, the personal information we hold about you. When you do this, we will endeavour to deal with your request in a reasonable time frame. If you believe we have inaccurately recorded information about you, you can request that we make notations in our records relating to this inaccuracy.

Who Is Bombora Advice

Bombora Advice is the holder of an Australian Financial Service License (AFSL Number: 439065). This license is issued by the Australian Securities and Investments Commission (ASIC).

If you have any questions or concerns about our Privacy Policy, or our practices in this area, please contact your adviser in the first instance. We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need further information from you to resolve your complaint.

You can contact us by writing to:

General Manager
Bombora Advice Pty Ltd
Level 2, 406 Collins Street Melbourne Vic 3000
Please mark your envelope "Privacy Policy Concerns"
Email: info@bomboraadvice.com.au

Complaints Resolution:

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days however some complaints may take longer to resolve depending on their complexity. If your complaint is taking longer, we will let you know

what is happening and a date when you can reasonably expect a response. Should your issues or concerns remain unresolved or are not resolved to your satisfaction, there are external bodies you can go to.

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving providers of financial services.

AFCA can be contacted at:

The Australian Financial Complaints Authority
GPO Box 3, Melbourne Vic 3001
Phone: 1800 931 678
email: info@afca.org.au
www.afca.org.au

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
email: enquiries@oaic.gov.au
www.oaic.gov.au