

Suite 1310  
530 Little Collins Street  
Melbourne VIC 3000

The ability for Keep Wealth Partners to provide you with comprehensive financial advice and the highest quality professional service is dependent on us obtaining and holding personal information about you. We recognise the importance of gathering and maintaining this information while also protecting your privacy. This Privacy Statement sets out how we handle this information.

Keep Wealth Partners Pty Ltd (Keep Wealth Partners) abides by the Australian Privacy Principles (APPs) established under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and the *Privacy Act 1988* which covers the collection, use, disclosure and storage of personal information. We outline below how we address each of these APPs.

### **APP1 – Open and transparent management of personal information**

Keep Wealth Partners are committed to managing any personal information in an open and transparent way. We collect personal information from you and about you (from third parties) as part of our advisory role. Where we do collect this information, we will remain open with you about what information we hold, how we collect it and why it is needed.

Any personal information we hold about you will be securely stored either in hard copy or on computer hard drive. We may back up some or all this data using 'cloud-based' technology. To the best of our knowledge this storage is held via infrastructure in Australia, but if you have concerns over this we are happy to investigate further and advise.

If you would like more information on our Privacy Statement or would like a copy of our Privacy Policy, please contact our Privacy Officer. Contact details are provided at the end of this document.

Should you have any call to complain about our treatment of your personal information you can contact us or the Privacy regulator directly – they are accessible at: [www.oaic.gov.au](http://www.oaic.gov.au).

### **APP2 – Anonymity and pseudonymity**

While this principle allows for the option of not identifying yourself or using a fictitious name, we believe we cannot practically provide our services under these arrangements.

### **APP3 – Collection of solicited personal information**

Our ability to provide you with a comprehensive service is dependent on us obtaining certain personal information about you. This may include:

- name and contact details;
- date of birth and gender;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, bank accounts, investments and superannuation;
- employment details and employment history;
- details of your financial needs and objectives;
- details of your estate planning requirements; and
- documentation used for identification and verification purposes. We only collect information from you that we believe we need to deliver our services to you. If we seek to collect sensitive personal information from you, we also seek your express consent first.

**APP 4 – Dealing with unsolicited personal information**

If we receive unsolicited personal information from you (i.e. information we don't need to deliver our services) we will contact you and return it or otherwise remove it from our records as soon as is practicable.

**APP5 – Notification of the collection of personal information**

Where we collect personal information from third parties (e.g. a superannuation provider) we will inform you when this occurs, why we require the information and who we may disclose it to.

**APP6 – Use or disclosure of personal information**

We will not use or disclose personal information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where required or authorised under law or for inspection to ensure compliance with mandatory professional standards; or
- where the APPs authorise use or disclosure.

**APP7 – Direct marketing**

Keep Wealth Partners may use or disclose personal information gathered from you for direct marketing where there is a reasonable expectation we collected the information for that purpose. We will not directly market to you using information considered sensitive unless you have provided consent. We will also always provide the option to 'opt out' so you do not receive direct marketing from us.

**APP8 – Cross-border disclosure of personal information**

We will seek your consent should we have to engage with or are required to send personal information to an overseas entity to fulfil our services to you. Where we back-up our business data via 'cloud-based' technology, and in circumstances where this infrastructure is hosted overseas, we will confirm from any such service provider that they will treat your data securely and in alignment with the APPs.

**APP9 – Adoption, use or disclosure of government related identifiers**

We will not adopt, use or disclose any government related identifiers (e.g. Tax File Numbers) unless it is necessary for us to deliver our services to you, we need to liaise with a government department or is required under an Australian law or a court/tribunal order.

**APP10 – Quality of personal information**

We will take reasonable steps to ensure that the personal information we collect, hold or disclose is accurate, up-to-date and complete.

**APP11 – Security of personal information**

We will take all reasonable steps to maintain and store your personal information securely (both physical and electronic). Once we no longer require this information, we will take all reasonable steps to destroy, de-identify or return the information to you or your nominated agent.

**APP12 – Access to personal information**

You may at any time request access to the personal information we hold about you. Where possible, we will provide access to that information by providing copies, allowing you to inspect or providing you with an accurate summary of the information requested. If we believe a statutory exemption applies and we refuse access of the information we will provide written notice of the reasons for refusal.

**APP13 – Correction of personal information**

We will take all reasonable steps to rectify any personal information we hold about you should you (or we) consider our records to be inaccurate. At your request, we will also notify any third party of the correction.

**Contact Details**

If you have any questions about this Privacy Statement, requests for access or corrections to personal information, privacy complaints or any other privacy related matter please contact our Privacy Officer.

**Privacy Officer:** Andrew Aylward  
**Address:** Suite 1310, 530 Little Collins Street, Melbourne, Vic, 3000  
**Telephone:** 03 8610 6396  
**Email:** info@keepwp.com.au