

Privacy Policy

Integral Wealth Management Pty Ltd

ABN 33 124 445 441

Protecting clients' privacy is very important to us. We are bound by, and committed to supporting the Privacy Act 1988 (Cth) and the Australian Privacy Principles. The information set out below is a summary of our obligations under the APPs.

Scope

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles, which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations in the financial industry and any organisation that manages personal information.

If you would like a copy of our privacy policy, please visit our website www.hollandtax.com

Purpose

The Policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the Australian Privacy Principles.

What information do we collect?

The type of information collected from you includes information that is necessary for us to provide advice to you. We may ask you to provide personal information such as:

- Your name, date of birth and occupation
- Your income, expenses, assets and liabilities
- Your tax file number (TFN)
- Details of your partner and dependents
- Your citizenship and / or residency status
- Your current insurances

Sensitive information we collect and hold

We will only collect sensitive information to provide you with financial products and services. Sensitive information includes information relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, membership of a professional or trade association or trade union, sexual orientation and criminal record. It may also include information about a person's health and medical history. The Australian Privacy Principles set out restrictions about the way sensitive information can be used. Unless you give us your consent, or if we are required or permitted by law, we will only use or disclose sensitive information for the purposes for which it was provided.

If you do not provide us with personal information of the type indicated above, or you provide incomplete or inaccurate information, we may not be able to provide you with advice that is appropriate to your needs, circumstances and objectives.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information.

For example, in addition to obtaining personal information from you, whenever you acquire a new product or service via us, we will need to obtain certain documentary evidence from you as to your identity to ensure compliance with the Anti-Money Laundering / Counter Terrorism Financing (AML/CTF) laws. Such evidence may include for example a certified copy of your driver's licence, passport or birth certificate.

If we receive any information about you that is unsolicited and is not required to be collected for the purposes outlined in this section, we will, if it is lawful and reasonable to do so, destroy the information or ensure the information is de-identified.

How do we collect personal information?

We collect your personal information directly from you where this is reasonable and practical. We gather this information either through application or other forms you complete (commonly referred to as "fact finding" documents) or by recording the information you provide via phone calls, interviews and other forms of communication.

In addition to the above, we may also collect information from you from external sources. Examples of the people or organisations who may provide us with information are:

- Parents or guardians, in respect of children
- People authorised by you (such as lawyers or accountants)
- Public sources of information
- Third-party brokers (such as insurance brokers)

How we hold Personal Information

We will store your personal information in files within secure office premises, as well as electronically on financial planning software and on secure servers. We have security and privacy measures in place to ensure the integrity of your personal information and to protect it from misuses, interference and loss, and from unauthorised access, modification or disclosure.

Where we hold information that we no longer require for any purpose and it is not required to be maintained by Australian law, we will take reasonable steps to destroy the information or ensure that the information is de-identified.

We use a range of physical and electronic security measures to protect the security of the personal information we hold.

For example:

- Access to information systems is controlled through identity and access management
- Employees are bound by internal information security policies and are required to keep information secure
- All employees are required to complete training about information security
- We regularly monitor and review our compliance with internal policies and industry best practice. We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used

How do we up-date your personal information?

You can let us know about your up-dated personal information over the telephone or in writing (including email). We will use this information to up-date our internal records only.

Where we manage investments for you, we will ask you to sign a form for each of the investments that you hold and we will forward this form to the relevant external institutions. In some instances, the external institutions will require additional documentation as evidence of the change (such as where you have changed your name). We will let you know if this is required.

If we believe the information we hold is incomplete or out of date, we may also seek to correct or up-date our records by gathering data from other sources, such as public records and other organisations.

How do we use the information that we collect from you?

We will use your personal information to contact you regarding newsletters, article and market updates we believe may interest you, but we will not do so if you tell us not to. We may contact you by various means, including by mail, telephone, email, SMS.

If you don't want to receive newsletters or updates from us please contact us

Who do we give your information to?

We may disclose your information to the following parties:

- Product issuers with whom you are investing or taking out insurance policies with
- Internal staff members of Integral Wealth Management Pty Ltd and Integral Wealth Management Tax and Accounting Pty Ltd
- External compliance contractors for the purposes of auditing our financial advice
- Accountants, solicitors and other professionals to whom you consent to disclose your information for the purpose of providing services to you related to your financial planning requirements.

There are also situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).
- We may also disclose your information to a third party as nominated by you with your consent.

Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. Before providing the requested information, we will give you an estimate of any potential costs associated with this, including expenses for locating, retrieving, reviewing and copying any of the material you need. We may charge a reasonable fee to cover these costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up-to-date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out-of-date, irrelevant or is misleading.

Complaints

We take privacy-related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. You can let us know of any concerns you might have in relation to privacy in any of the following ways:

Telephone	(07) 3379 8233
Email	admin@hollandtax.com.au
Writing	Holland & Holland PO Box 172, SHERWOOD QLD 4075

Our Compliance Manager will respond to your complaint within 5 days of its receipt. In the event the Compliance Manager is unable to resolve your complaint, or if you feel it is taking too long to resolve, you may lodge a complaint with The Office of Australian Information Commissioner in any of the following ways:

Telephone	1300 363 992
Email	enquiries@oaic.gov.au
Website	oaic.gov.au

We may update or amend our Privacy Policy from time to time as required by law, or changes to our business. An up-to-date version of the Privacy Policy is available via our website www.hollandtax.com or by contacting our office on (07) 3379 8233 or via email admin@hollandtax.com.au