

Privacy Policy (“Policy”)

This Policy was last updated on 1 April 2019

Madison Financial Group Pty Ltd ABN 36 002 459 001, its Corporate Authorised Representatives, Authorised Representatives, and employees, (“we”, “our” or “us”) are committed to protecting the personal information that we may collect and hold about you. This Policy sets out our procedures relating to management of your personal information. This policy is based on our obligations under the *Privacy Act 1988* (Cth) (“Act”) (including Australian Privacy Principles (“APPs”).

By voluntarily supplying us with your personal information, you are agreeing to be bound by this Policy.

Any amendments to this Policy will be notified to you by posting an updated version on our website.

Please note that our website contains links to other websites. When a user has clicked on a link to another site, they leave our site and are no longer protected by this Policy.

Collection of personal information

The personal information we may collect and hold about you includes:

- contact information such as your name and address, telephone numbers and email address;
- personal medical information;
- tax file numbers;
- details about your personal financial situation, including your investments and superannuation details, income and expenses;
- financial information, including bank account details and credit card details; and
- business details, and details about any trusts (including but not limited to Self-Managed Super Funds), including Australian Business Number (“ABN”).

Cookies

We may use “cookies” or similar technologies to collect data. A cookie is a small file, typically of letters and numbers, downloaded on to a device when you access our website. Our website collects the following information from users:

- your server address;
- your top level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;
- the previous site you have visited; and
- the type of browser you are using.

Means of collection of personal information

Your personal information may be collected in a number of ways, including:

- directly by our staff, or staff of our Corporate Authorised Representatives, when you seek, or enquire about, our services;
- when you use our website or complete a form on our website.

In some circumstances, where it is unreasonable or impracticable to collect information from you, we may collect information about you from a third-party source. For example, we may collect information from a publicly maintained record or from

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- a third party you have given us permission to contact (such as an accountant, solicitor, superannuation trustee, insurance provider etc).

You need not provide all the information requested by us, but this may prevent us from providing some or all of our goods or services to you.

Use, disclosure & purpose

We collect, hold and disclose your personal information for the following purposes:

- to enable us to provide financial product advice and services to you;
- to personalise and customise your experiences with our website;
- for our Corporate Authorised Representatives, Authorised Representatives, and anyone who applies to be authorised under Madison's AFSL, to fulfil our obligations as an AFSL holder and to provide you with support as you fulfil your legal obligations; and
- other purposes related to any of the above.

We will only use your information for the purposes for which it was collected ("**primary purposes**") or a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent.

We may disclose your information to necessary third parties, who assist us to provide, manage and administer our goods and services. Information provided to third parties will be dealt with in accordance with that entity's privacy policy. People we may disclose your information to include:

- third parties that provide goods and services to us or through us;
- third parties, such as marketing and digital agencies, who may send to you our e-newsletters on our behalf;
- our website host or software application providers; and
- third parties who support Madison, our Corporate Authorised Representatives, and/or our Authorised Representatives, in the provision of financial product advice and services to clients.

We may need to share some of your information, including credit information, with organisations outside of Australia. Overseas recipients are likely to be located in the Philippines. We may also store your information in networked or electronic systems, such as the cloud. Because the cloud can be accessed from various countries through an internet connection, it may not always be practicable to know in which country your information is held. If your information is stored in the cloud, disclosures may occur in countries other than the Philippines.

- we will not disclose information to an overseas recipient unless: we have taken reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles,
- we have obtained consent from the individual, and/or
- the disclosure is required or permitted by law.

Quality, access to & correction of information

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information to be in writing outlining the details of your request. Such requests should be addressed to the Privacy Officer via the details provided in this Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. We will, on request, provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

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- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

Storage and Security

Your personal information will be stored as physical files in a secured area, on our electronic data base system and on computers with appropriate back up and security systems.

We take reasonable steps to hold information securely in electronic or physical form. We are committed to keeping secure the data you provide to us and we will take all reasonable precautions to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

- imposing confidentiality requirements on our employees;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given;
- controlling access to our premises; and
- implementing website protection measures.

Dealing with us anonymously

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym.

Complaints

If you believe that we have breached a term of this Policy or the Act you may submit a written complaint. The written complaint can be emailed or posted to us using the contact details set out below. You must include contact details for us to contact you regarding your complaint.

Our Privacy Officer will consider your complaint and respond as soon as reasonably possible, but not more than 30 days from receiving the complaint.

If you are unsatisfied with the outcome of your complaint you may refer your complaint to the Office of the Australian Information Commissioner to be resolved.

Contact us

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your information is collected or used;
- contact us regarding any other matter concerning this Policy,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

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If you do not wish to receive direct marketing from us, please contact our Privacy Officer via the details below. Our contact details are as follows:

Phone: 1300 789 575

Postal address: Madison Financial Group, PO Box R1776, Royal Exchange, NSW 1225, Australia

For more information on privacy see the Office of the Australian Information Commissioner's website at: <http://www.oaic.gov.au>.