



Our Commitment

At Henderson Matusch (HM) we recognise that your privacy is important. We are bound by and are committed to supporting the Australian Privacy Principles (APP) set out in the Privacy Amendment (Enhancing Privacy Protection) Act 2012. The information set out below is largely a summary of our obligations under the APP.

Collection

Our main purposes for collecting personal information are to facilitate financial planning, financial products or services, insurance policies or related services, and to update our records. At or before the time or as soon as practicable after 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 may happen if you do not provide personal information to us. As part of our arrangements with third parties, we may collect or have access to personal information from third parties for the purpose of sending information about its goods and services.

Unsolicited personal information

If we received unsolicited personal information we will determine whether we could have collected that personal information by lawful and fair means, and whether it is related to one of the purposes of collecting personal information above. We will do this by looking at our relationship with the individual and whether the personal information relates to our relationship with them.

If we could not have collected the personal information by lawful and fair means, or the personal information does not relate to one of our purposes for collecting the personal information, we will destroy the personal information.

Use and Disclosure

We are subject to certain legislative and regulatory requirements that necessitate us obtaining and holding detailed information that personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a comprehensive financial planning and advisory service is dependent on us obtaining certain personal information about you, including: employment details and employment history, details of your financial needs and objectives, details of your investment preferences and aversion to or tolerance of risk, details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure etc, information about your family structure, commitments and social security eligibility, any other relevant information including medical history and/or reports required for the purposes of risk insurance.

We may use the personal information collected from you and third parties for the purpose of providing you with direct marketing material such as articles or goods and services that may be of interest to you. You may, by contacting us by any of the methods detailed in this policy statement, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

Cross-border disclosure of personal information

We do not disclose personal information overseas.

Data Quality

Pursuant to the Corporations Act, and Rules of Professional Conduct of the Financial Planning Association of Australia, we are required to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information, you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of the advice given to you.





Data Security

We hold personal information on secure IT systems. All IT systems are appropriately updated with passwords, virus scanning software and firewalls when needed. Any paper records are only accessible to employees and others as they are needed. Any paper records are held within an office that is locked and security protected at night.

We take reasonable steps to ensure that information is accurate, up-to-date, and complete as well as relevant, having regard to the purpose of the use or disclosure, and also to protect the information we retain from misuse, interference, such as attacks on our computer systems, loss and from unauthorised access, modification or disclosure. We will not retain any of your information for any longer than it is required by us, except to satisfy legal requirements. We will destroy or de-identify your personal information when it is no longer required. We will do this by shredding paper copies and deleting electronic records containing personal information about the individual or permanently de-identifying the individuals within those records.

Openness and Transparency

We may use and disclose personal information for the purposes for which it was provided, or secondary purposes in circumstances where you would reasonably expect such use or disclosure. We may disclose personal information to third parties or external contractors carrying out functions and duties for and on behalf of us.

It is a condition of our agreement with each of our external contractors that they adhere to this Privacy Policy.

The information we collect from you may also be disclosed to third parties if the disclosure is required or permitted by law, or pursuant to the Rules of Professional Conduct of the Financial Planning Association of Australia.

We regularly update our privacy policy and will provide a copy of our privacy policy free of charge on request and in a suitable format. In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client, you will be advised of any such transfer.

Access and Correction

You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law. We will not provide you access to personal information which would reveal any confidential formulae or the detail of any inhouse evaluative decision making process, but may instead provide you with the result of the formulae or process, or an explanation of that result.

We reserve the right to charge a reasonable fee for searching for and providing access to your personal information. In the event we refuse access to your personal information, we will provide you with a written explanation of that refusal and the mechanisms available to complain about the refusal.





We will take reasonable steps to correct the personal information about you that we hold to ensure that it is up-to-date, accurate, complete, relevant and not misleading. However, the accuracy of the personal information is also dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

You are entitled to obtain access to the information which we hold about you by telephoning the Privacy Manager on 07 3229 3688, by email info@hendersonmatusch.com.au, or by writing to: the Privacy Manager, Henderson Matusch, GPO Box 314, Brisbane QLD 4001.

Identifiers

In some circumstances, we are required to collect government related identifiers, for example, your Tax File Number. We will not use or disclose this information other than when required to do so by law or when consented to by you.

Anonymity and Pseudonymity

You may deal with us anonymously or by using a pseudonym where it is lawful, practicable and reasonable to do so. Generally we are not able to deal with clients who do not wish to identify themselves. However, where possible and appropriate we will provide information of a general nature to unidentified individuals.

Sensitive Information

Without your consent, for example, where information is provided by you for insurance and/or risk purposes, we will not collect sensitive information about you. Exceptions to this include where the information is required by law, or for the establishment, exercise or defence of a legal claim.

Privacy Complaints

If you wish to complain about any breach or potential breach by us of this Privacy Policy, or the Australian Privacy Principles, you should contact us by any of the methods contained in this policy statement and request that your complaint be directed to the Complaints Manager. Your complaint will be considered within seven (7) days and responded to accordingly. It is our intention to use our best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner, Level 3, 175 Pitt Street, Sydney NSW 2000; Tel: 1300 363 992; Email: enquiries@oaic.gov.au, who may investigate your complaint further.

