

Privacy Policy

Balance Impact ('we', 'us' & 'our') recognise that your privacy is very important to you. The Privacy Act 1998 (Cth) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012 sets out the Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. This Privacy Policy discloses how the personal information you provide to us and our representatives is collected, used, held, disclosed and disseminated. We are required to meet particular legislative and regulatory requirements. In order to provide our services to you, we are required to collect certain personal information from you.

Your personal information

As a financial planning organisation, we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including s961B of the Corporations Act, which may include, but is not limited to your:

- Name, date of birth, current addresses, telephone, mobile, fax numbers, e-mail address;
- Financial needs and objectives;
- Assets and liabilities (current and future), income, expenses;
- Risk Profile details.

We are required to also collect certain information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter Terrorism Financing Act 2006. This information will be held securely on your file and may only be divulged to others if required under the law.

How we collect personal information

We collect personal information in a number of ways, including:

- Directly from you via email or the internet, and
- Directly from you, when you provide information by phone.

How we use your personal information

Primarily, your personal information is used in order to provide our services to you. We may also use the information that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed.

Should you choose not to provide certain personal information or provide incorrect information, the advice and/or recommendations may be inappropriate or inadequate.

From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any more, you may contact us with this request. We maintain a register for those individuals not wishing to receive direct marketing material.

We may disclose your personal information to product issuers and other service providers for the purpose of giving effect to your Statement of Advice and the recommendations made by us.

If we propose to issue shares in the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. 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.

We don't usually collect unsolicited personal information. If we receive such information, we will determine whether or not it would have been permissible under the APPs to collect that information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we will destroy or de-identify that personal information as soon as practicable.

When we disclose your personal information

In certain circumstances, we are required to collect government identifiers such as your tax file number, Medicare number or driver license number, however we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

For the purposes set out above, we may disclose your personal information to organisations outside Balance Impact. The organisations to which we disclose information may include:

- Fund managers and other product providers in order to implement your financial plan/recommendations;
- Compliance consultants to ensure that our representatives are meeting our compliance standards;
- Your professional advisers, including your Solicitor or Accountant as authorised by you;
- Information technology service providers to manage our IT systems;
- Government and regulatory authorities and other organisations, as required or authorised by law;
- Another authorised representative of Balance Impact necessary; and
- A potential purchaser/organisation involved in the issuance of shares in our business for the purpose of due diligence.

How we store and secure this information

Your personal information will be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site.

Personal information will be treated as confidential and sensitive information will be treated as highly confidential. It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be securely destroyed.

Ensure your personal information is correct

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- Inform us of any errors in your personal information as soon as possible, and
- Update us with any changes to your personal information as soon as possible.

Access to your personal information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include providing you with:

- Copies;
- The opportunity for inspection, or
- A summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

We will not provide you with access to your personal information if:

- Providing access would pose a serious threat to the life or health of a person
- Providing access would have an unreasonable impact on the privacy of others
- The request for access is frivolous
- The information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- Providing access would be unlawful
- Denying access is required or authorised by or under law, or
- Providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or

an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

Staying anonymous

You can deal with us anonymously where it is lawful and practicable to do so, for example, if you telephone requesting our postal address.

Sending data overseas

We will not send any personal information about you overseas unless you consent to it or we reasonably believe that the other country has privacy laws substantially similar to our own, or we provide the information in other circumstances giving like protection.

Complaints resolutions

Please contact our Privacy Officer via email at: info@balanceimpact.com if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

Our website

Our website provides links to third party websites. The use of your information by these third party sites is not within our control and we cannot accept responsibility for the conduct of these organisations.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us.

Our website uses first party cookies (i.e. cookies set by us) and third party cookies (i.e. cookies set by parties other than us that enable third party features or functionality such as advertising and analytics). We use first party cookies to provide you with a better user experience by enhancing the performance and functionality of our website. Without these cookies, certain functionality may become unavailable.

We also use third party cookies to collect information to help us understand how our website is being used and how effective our marketing campaigns are.

Cookies allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them. We encourage you to check our website regularly for any updates to our Privacy Policy.

Contact details

If you have a query about your privacy or our policy, you can contact us on (02) 8226 8596, info@balanceimpact.com, or by mail to:

Privacy Officer
Balance Impact
Level 26, 1 Bligh Street
Sydney, NSW 2000.