

# Privacy Policy

Prime Financial Group Ltd (ASX: PFG)

Version: 14 March 2019



*aspire, innovate, grow*



### Who does this Policy apply to?

This Privacy Policy applies to Prime Financial Group Ltd and its controlled entities including but not limited to Primestock Securities Ltd, Primestock Wealth Management Pty Ltd and Prime Accounting & Business Advisory Pty Ltd ('The Prime Group'). For the purpose of this Privacy Policy, the Prime Group also includes all authorised representatives of Primestock Securities Ltd.

### Our commitment to you

The Prime Group believes you have the right to keep your personal information private, and to make sure that we protect and maintain the privacy, accuracy and security of your personal and financial information. We have set up systems and procedures to ensure that we protect these rights.

### What are your rights?

- You have the right to know:
- Why we are collecting your personal information
- What information we hold about you
- How we use that information
- Who we share the information with

You also have the right to:

- See this information
- Correct this information if it is wrong

### Why, what and how will we collect information?

- We need to collect personal information from you to comply with our legal obligations to provide you with informed and appropriate financial advice and other services.
- Without collecting personal information, we are unable to prepare financial plans, conduct risk analyses, provide you with financial and other advice, products and services
- We will only collect information relevant to our business relationship with you. The information we collect will include your name; contact details including email addresses, residential and/ or postal address and telephone numbers; date of birth; occupation; employer; your health details; financial information, tax file number (TFN); and other information that we require to be able to provide you our services.
- We will not collect any sensitive information, such as information relating to your health, unless this is necessary to provide you with a specific product or service (e.g. life insurance policies; analysing if a product is appropriate your investment timeframe; etc.) and you have consented to that collection.
- How we collect your information will depend upon how you interact with us. We may collect your

personal information directly from you or if you have authorised us to do so, other sources such as your service providers (superannuation, insurance, investments, etc.) or from your other advisers (accountant, lawyer, doctor, etc.). We may collect this information in person or via telephone, mail, fax, email or internet contact.

- When you speak to us about your personal financial affairs, we will minimise the opportunity for other people to overhear our discussion.

### How will we use your information?

We will limit the use of your personal information to:

- Provide financial and other advice including recommending financial products and services that you may need.
- Implement any advice or instructions with regards to investment or insurance products.
- Provide you with commentary about the investment markets and technical information which will impact your financial position.
- Carry out planning, product development, research and analysis.
- Fulfil our legal requirements (for example, comply with legislative requirements such as the AML-CTF Act, disclosure to regulators, or other legal authorities).
- Provide accounting, business advisory, taxation and capital related services.
- Keep you up to date on other products and services offered by us.

You can notify us at any time if you do not wish to receive these offers by calling us on 1800 064 959 or by writing to us at Level 17, HWT Tower, 40 City Road, Southbank VIC 3006 or by telling any of our authorised representatives. We will act promptly on any such request.

### Who will use your information?

- We will disclose your information to organisations involved in providing, managing or administering our products or services with your consent such as platform providers, banks, custodians, insurers, investment managers, mail houses, tax authorities or external dispute resolution services.
- We bind these companies to the same standard of care as we do ourselves so that they cannot provide this information to anyone else. We enforce this requirement through contractual agreements.
- We share your personal information with companies within the Prime Group.

- 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), necessary to discharge obligations (such as to foreign governments for the purposes of foreign taxation) or required to assist in law enforcement (such as to a police force).
- We will not share, sell or trade your personal information to any company or person who is not a member of the Prime Group.

### Will your information be secure?

- We will implement processes and controls to keep your personal information secure and confidential.
- Only employees of the Prime Group and those who perform services on our behalf, and are authorised to handle your information, will have access to your personal information.
- We will not retain any of your information for any longer than it is required by us, except to fulfil our legal obligations. As a guide, the law generally requires us to retain information for seven years; however, we may retain some information for shorter or longer periods than this, depending upon any specific legal requirements and the needs of our business.
- We will, with your help, keep your personal information accurate, complete and up to date.
- If you use myPrime or Prime Connect sections of our website, we will verify your identity by your username and password. Once verified, you will have access to secured content. You are responsible for maintaining the secrecy of your login details.
- Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience, including presenting web pages and information according to your needs or preferences. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. We may also use external service providers to track the traffic and usage on the website. These cookies may be permanently stored on a computer or are temporary session cookies. Cookies are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser. Web browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact

the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

### International Data Transfers

Prime may need to disclose your information to organisations located overseas. These organisations are service providers which perform a range of technology and operational service functions on Prime's behalf. At present, these entities are located in USA, France, Japan, China, Sri Lanka, Malaysia, Ireland and India. When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia.

### Will you have access to your information?

You can access most of the personal information we hold about you and request corrections.

- This right is subject to some exceptions, for example, you may not obtain access to information relating to existing or anticipated legal proceedings.
- You can request access to your information by calling us on 1800 064 959 or by writing to us at Level 17, HWT Tower, 40 City Road, Southbank VIC 3006. This service is free unless the information you request requires significant research or preparation time. Before we act upon requests of this nature, we will tell you how much this service will cost.

### How can you correct or update your information?

If any of your personal information that we are holding is incorrect, you can update the information by calling us or writing to us at the address above.

### How can I resolve any privacy issues?

Prime is bound by the Australian Privacy Principles for the handling of personal information. Our policies, processes and systems have been developed to ensure we comply with all our obligations under the Privacy Act.

If you have a privacy concern, please contact us by calling us on 1800 064 959 or by writing to us at Level 17, HWT Tower, 40 City Road, Southbank VIC 3006.

You may also contact the Australian Financial Complaints Authority (AFCA) who are an independent complaints body, by calling them on 1800 931 678 or by post at GPO Box 3, Melbourne VIC 3001.

Before you contact AFCA, we recommend that you first try to resolve your concern with us.

*aspire, innovate, grow*

# Contact us

## OUR OFFICES

### VIC

Level 17, HWT Tower  
40 City Road  
Southbank VIC 3006

### NSW

Level 4  
8 Spring Street  
Sydney NSW 2000

**P** 1800 064 959

**E** [clientservices@primefinancial.com.au](mailto:clientservices@primefinancial.com.au)

**W** [www.primfinancial.com.au](http://www.primfinancial.com.au)

**f** PrimeFinancialGroup

**in** PrimeFinancialGroup

### QLD - Brisbane

Level 2  
127 Creek Street  
Brisbane QLD 4000

### QLD - Cairns

Suite 2, First Floor  
280-286 Sheridan Street  
Cairns QLD 4870

Financial Services are provided by Primestock Securities Ltd  
AFSL 239180 | ACN 089 676 068

Prime Financial Group Ltd ACN 009 487 674



*aspire, innovate, grow*