

NAVWEALTH GROUP

NAVWEALTH PRIVACY POLICY

Protecting your information is important to us. Navwealth Financial Group Pty Ltd ABN 71 064 594 350 (Navwealth) and all other related entities understands the importance for our clients to know how we deal with their personal information. This statement outlines our current privacy policy.

The Australian Privacy Principles (APP's) were established under the Privacy Act 1988 as amended to 16 December 2020. A copy of the Australian Privacy Principles may be obtained from the website of the OAIC – Office of the Australian Information Commissioner at www.privacy.gov.au. Navwealth abides by these APP's.

We are committed to protecting the privacy of the personal information we collect and receive. This policy document explains the type of information we may collect, from you and your business and what we do with such information in performing our functions and in light of our privacy obligations.

It also seeks to explain how you can access and correct the personal information we hold about you or complain about any suspected privacy breach.

A copy of this Privacy Policy can be found on Navwealth's website: <https://navwealth.com.au>

Collection of Information

As the Navwealth Group comprises Navwealth Accounting Pty Limited, Navwealth Bookkeeping Resources Pty Ltd and Navwealth Financial Group Pty Limited entities, we are required under legislation and codes of practice to collect certain information in order to provide the range of services as outlined in our Fee Services Agreement. These include, but are not limited to, the Corporations Act, Superannuation Guarantee Act, applicable Australia Securities and Investment Commission (ASIC) regulations, rules of professional conduct of the Financial Planning Association (FPA), CPA Australia Limited (CPA) and the *Tax Agents Services Act 2009*.

It is important, in order to provide high quality comprehensive services, that it will be necessary to obtain certain personally sensitive information.

The staff and other representatives of Navwealth may request personally sensitive information from our clients or their authorised representatives which will generally compromise but not limited to the following:

- Personal details: including name, address, phone, facsimile, email, date of birth, marital status, dependants, employment details etc.
- Financial details: including assets, liabilities, income and expenses
- Investment details: including quantities, values, investor identifications and bank account details
- Personal goals and objectives and risk profiles
- Insurance details: including life, trauma, permanent disablement, income protection and general insurance
- Estate planning details: including status of wills, executors, beneficiaries and powers of attorney, trust deeds and company regulations.
- Taxation information: including tax file number (TFN)

- Centrelink details: including benefit type and reference number
- Professional and trade bodies and memberships and ethnic origins

We may elect to terminate our relationship with a client if this information is not provided or is provided incorrectly or is incomplete, as it will affect the accuracy and completeness of the advice or services offered.

We will collect personal information only when that information is knowingly collected directly from our client or an authorised third party of that client. Client

- In the provision of accounting and financial planning services
- Completion of relevant forms and documentation which are the subject of our Fee Service Agreement.
- To provide agreed services to assist in meeting client requirements, goals and objectives
- To market services supplied by Navwealth or associated entities that may be of interest to clients unless otherwise specified
- The entities or organisations to whom we may provide information include but are not limited to:
 - Associated companies and or divisions of Navwealth
 - Financial institutions with whom clients are investing, may be investing or have previously invested
 - Government authorities including the Australian Taxation Office, RBL Office and Centrelink
 - External service providers or compliance inspectors for audit purposes be they Government or Statutory Authorities.
 - External parties for business broking
 - Any other external party as specifically authorised by clients from time to time
- In providing information we will not use or disclose information obtained for any other purpose other than for purposes made known to our clients unless the disclosure is:
 - Required by law to institutions that have the power to order us to disclose such information
 - Is authorised by law such as in situations where we have a duty to protect the public or the Navwealth business
 - Clients have consented to prior to the provision of the information

Information will be collected from a variety of sources including internal entities of Navwealth and other external sources.

We will only collect, maintain and use personal & sensitive Information if it is necessary for us to adequately provide the services requested.

Use of Disclosure Information

Any personal information about clients collected by Navwealth will be used only for the following purposes:

Navwealth will not trade or sell any personal information obtained and received in respect of clients. We may use the personal information collected in order to provide specific direct or indirect marketing material such as articles of interest, unless otherwise requested not to do so by a client. The direction not to receive or otherwise receive this information can be updated by contacting Navwealth on (02) 9008 3000 or admin@navwealth.com.au

NAVWEALTH GROUP

Quality of Personal Information

Navwealth is committed to ensuring that personal information held is accurate, complete and up to date. Navwealth has implemented a review service to aid with this process. To assist us in the completeness of this information, it is requested that clients contact us in a timely manner if there has been any change to their details or, they believe any information obtained or retained by Navwealth is inaccurate in any nature.

Storage and Security

Navwealth recognise the importance of the privacy of personal information.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

Personal information is generally held in client files and or computer software database programs. All paper files are stored in secure areas and all computer based software information is protected by access passwords. Navwealth will at times utilize cloud computing software which include but is not limited to Class Super and Xero whom will have their own independent privacy policies.

In the event a client ceases an engagement with Navwealth, any personal information collected will be held in a secure area internally or at a secure offsite storage facility for the minimal statutory periods (at least 5 years) in order to comply with legislative and or professional requirements, following which time the information may be destroyed at the sole discretion of Navwealth Accounting Directors.

Access to Personal Information

A client may, at any time, request access to their personal information. Navwealth will provide access to the information either by providing copies of the requested information, allowing the inspection of the information or providing an accurate summary of the information held.

Where necessary, evidence of identity will be required before access is provided

In the event that access to personal information is refused, Navwealth will provide an explanation of that refusal and the reasons for the refusal

Navwealth will endeavor to respond to any request for access within a reasonable period of time. The time frames involved will depend on the complexity of the information and or the request. Navwealth reserves the right to charge a fee for the requested information if it is of significant nature.

Identifiers

Navwealth will not adopt any identifiers such as Tax File Numbers, Centerlink Reference Numbers and Medicare Numbers as its own.

Transfer of Information

Navwealth allows for the provision of sending personal information. Either when information is sent directly to a client, or to obtain further information from an organisation in order to aid services provided to a client.

Wherever possible the information provided will only be transferred to a party where Navwealth reasonably believes the other party or country has adopted privacy provisions similar to its own and wherever practical Navwealth will obtain a client's consent prior to the transferring of such information.

On-Line Privacy

Navwealth's website may contain links to other websites whose operators may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

We will not collect any information from our website except where visitors knowingly provide it to us. (An example of this is in a situation where a visitor to the website visits to browse or download information). Our system will record the date and the time of the activities, the information downloaded or viewed but nothing further. In the event that further information is obtained by completing an email or an online form Navwealth will collect the information if the details are provided. All such details will be securely kept with the knowledge of our clients in the form outlined in this Privacy Agreement

Privacy Complaints

If clients wish to make a complaint about any breach albeit actual or potential in nature, of this privacy policy they can contact the General Manager of Navwealth on (02) 9008-3000.

Any complaint will be responded to in a timely manner. It is Navwealth's intention if any such instance was to arise to use best endeavours to resolve any complaint to the satisfaction of the client, however if a client is not satisfied with our response, they are entitled to contact the OAIC – Office of the Australian Information Commissioner by calling their Privacy Enquiries Line on 1300 363 992.