

# PRIVACY POLICY

Clime Advice Pty Ltd  
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VERSION 1  
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# PRIVACY POLICY: OUR COMMITMENT

This document outlines Clime's policy with respect to handling the personal information we collect.

'Clime', 'we', 'us' or 'our' refers to Clime Investment Management Limited ABN 37 067 185 899 (the 'Group') including 'Authorised Representatives' meaning Financial Advisers operating under the AFSLs of the Group.

We collect personal information to provide you with the products and services you request as well as to provide information on other products and services offered by or through us. The law requires us to collect and retain personal information. Personal information may be used and disclosed within the Group to administer our products and services, and, unless you tell us otherwise, to provide you with related marketing information.

We will act to protect your personal information in accordance with the Australian Privacy Principles (APP). We only collect the personal information we reasonably require, in the course of our business of providing services, in accordance with this Privacy Policy by lawful, fair, and non-intrusive means. We cooperate with police and other enforcement and regulatory bodies as required or allowed by law.

You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please let us know so that we can correct it (refer to contact details in this document.)

The information in this document is considered to be true and correct at the date of publication. Changes to circumstances after the time of publication may impact on the accuracy of the information held.

## What personal information do we collect and hold

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The type of personal information we may collect from you includes, but is not limited to:

- names, address, email, phone numbers, and job titles;
- information in identification documents such as your passport or driver's license;
- tax file numbers (TFN) and other identification numbers such as Medicare number;
- date of birth and gender;
- financial information;
- details of superannuation and insurance arrangements;
- sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties;
- bank account details, shareholdings, and details of investments;
- educational qualifications, employment history, and salary;
- visa or work permit status; and
- personal information about your spouse and dependents.

The only circumstances in which we would collect, use, or disclose your government-related identifiers is where we are required or authorized by law to do so. For example, we may be required to disclose your Tax File Number (TFN) to the Australian Taxation Office, a superannuation or retirement income product provider.

As well as providing us with information upon which to provide a customized solution to your needs and objectives, we are required under the Corporations Act 2001 (Cth) and the National Consumer Credit Protection Act 2009 (Cth) to collect and hold this information.

## **How and why we collect information**

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We collect personal information from you in a variety of methods. Examples of the ways we collect personal information include:

- through communications between you and our representatives or your adviser or accountant;
- your use of our website;
- you completing application forms in relation to products and services;
- through other avenues, where required to meet regulatory requirements and comply with the law;
- you apply for employment with us; and
- through marketing activities which request information from you, such as surveys; and
- from publicly available sources of information such as social media websites.

Because our products and services are often offered by other intermediaries such as financial planners, solicitors, or accountants, we may collect personal information about you from these third parties.

We will only collect personal information from you where it is reasonably necessary for us to provide our services to you or to perform our functions or activities.

We will only collect sensitive information from you with your consent, except in permitted general situations which include:

- the collection of the information is required or authorised by or under an Australian law or a court/tribunal order;
- the collection is necessary to address a threat to an individual's life, health, or safety; and
- permitted health situations.

Identification documentation is required for collection by law under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), as we are required to know our clients. In some instances, we are required to verify this documentation against other records. For instance, identification for Australian companies, trusts, or registered co-operatives may need to be verified by a search of records held by regulatory bodies such as the Australian Securities and Investments Commission (ASIC) or the Australian Taxation Office (ATO), etc.

## **Use and disclosure of information**

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We will use the information you supply for the purpose of providing you with the services agreed under our engagement and related services, to meet obligations we may have at law, including in relation to health and safety.

We are obliged to maintain records which include personal information and make those records available for inspection by ASIC or other regulators under relevant law. If we provide information for the purpose of law enforcement activities, we will make a record of that provision.

It is a condition of our agreements with each of our authorised representatives (both personal and corporate) that they adopt and adhere to this Privacy Policy.

## **If you chose not to provide your information**

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The effectiveness of our services is specifically dependent on information you provide and it being relevant, complete, accurate and up-to-date. Without this, our services may not meet your needs or may result in unforeseen financial consequences. If you elect not to provide us with your personal information, as and when requested, we may not be able to provide you with services.

## **Websites, Marketing and Social Media**

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We may use personal information collected from you for the purpose of providing you with direct marketing material or from social media platforms; however, if you do not wish to receive such information, you can request not to receive it. Simply contact us by any of the methods detailed in this document. There is no cost for this request; however, please allow two weeks for your request to be actioned.

When you visit our website, details may be recorded about your visit, such as time and date, your computer IP address, pages accessed, time spent on the page, and type of browser. If you provide information on a social media platform, including but not limited to LinkedIn, Facebook, Twitter, and Instagram, we may hold, store, and disclose this information for the purposes of marketing or the provision of services to you.

This information is used in an anonymous format for statistical purposes and as such cannot identify you individually, unless we have sought permission from you to do so. Where you don't want this to happen, please notify us. Should you log into a client section of our website, we may use cookies to identify who you are while you are logged in for the session. The cookie is unique to that session, and the data within the cookie is encrypted. You must have cookies enabled to be able to use our site.

Our website may contain links to other websites. When visiting these websites, be sure to check the Privacy Policy as we are not responsible for the privacy practices of those other parties. Where you choose to communicate with us by email, we will store your email, name, and address with any other contact or personal details you have provided on our database.

The Group adheres to the Spam Act 2003 (Cth); accordingly, we will:

- obtain your consent before sending an electronic message to you (this can be express or inferred);
- provide sender identification (so that you know who sent the message); and
- provide you with the option to unsubscribe.

## Disclosing information to other parties

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In order to provide our services, we may disclose your personal information to internal and external parties, including, but not limited to:

- other entities who refer your business to us;
- affiliated product and service providers as well as external service providers such as superannuation fund trustees, insurance providers, and product issuers for whom we act as agents (so that they may provide you with the product or service that you seek or in which you have an express interest);
- auditors we appoint to ensure the integrity of our operations;
- suppliers from whom we order goods and services on your behalf (so that those goods and services can be provided to you);
- other persons acting on your behalf including your accountant, solicitor, executor, administrator, trustee, guardian, or attorney;
- if required or authorised to do so under law, law enforcement agencies, regulatory bodies, and government organisations;
- medical assessment services where you have sought insurance for the purposes of underwriting an insurance policy;
- other organisations, who, in conjunction with us, provide their products and services (so that they may provide their products and services to you); and
- other AFSLs, authorised representatives or their agents for the purpose of due diligence on one of our associated entities were they to decide to sell all or part of their business. In the event that a sale of business takes effect, we may transfer your personal information to the purchaser of the business. As a client, you will be advised of any such transfer and your information will not be exchanged if you object to the transfer.

If we have used an example to describe when we might exchange personal information, the exchange of personal information may not be limited to those examples or examples of a similar kind.

We disclose personal information when we outsource certain functions, including paraplanning, telemarketing, bulk mailing, market research, direct marketing, and information technology support; we may also seek expert help from time to time to improve our systems, products, and services.

In all circumstances where personal information may become known to our contractors, agents, AFSLs, authorised representatives or their agents, and outsourced service providers, there are confidentiality arrangements in place. Contractors, agents, other AFSLs, authorised representatives or their agents, and outsourced service providers are not able to use or disclose personal information for any purposes other than our own.

The Group takes its obligations to protect client information very seriously, and we make every effort to deal only with parties who share and demonstrate the same attitude. If we have used an example to describe when we might exchange personal information, the exchange of personal information may not be limited to those examples or examples of a similar kind.

## Sending personal information overseas

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We take reasonable steps to ensure that overseas recipients adhere to the APP. We may disclose your personal information to contractors overseas to provide services to you; however, when doing so you should be aware of the following:

- Your personal information may be accessed by our Group staff, representatives, or agents in other countries if that becomes necessary to deliver our services to you. This access is via a secure internet connection or, in some instances, by email;
- From time to time, information may be loaded to the cloud for storage; and
- It is possible that product and services providers we recommend may outsource functions using overseas contractors or companies that process these services using offshore resources. Where this is a concern to you, we suggest that you carefully read their Privacy Policy to determine the extent to which they send information overseas.

These service providers may be located in a number of countries including the United States of America, United Kingdom, Philippines, India, China, Serbia, Vietnam, and/or Sri Lanka.

## Accessing and correcting your information

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You can request us to provide you with access to your personal information we hold about you by sending us an email. To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete, or out of date, and we will take reasonable steps, in the circumstances, to ensure that it is corrected.

## Keeping your Information Secure

Your personal information is generally held in your client file and on our computer database. We will always seek to ensure that your personal information is protected from misuse, loss, unauthorized access, modification, or disclosure. At all times, your personal information is treated as confidential, and any sensitive information is treated as highly confidential. Our security measures include, but are not limited to:

- educating our authorized representatives and staff as to their obligations with regard to your personal information, cybersecurity threats, and scams;
- all hard copy files are stored in lockable cabinets/rooms;
- access to our premises is controlled by only allowing authorized personnel to access those locations where personal information is stored;
- all computer-based information is protected through the use of passwords on each computer, screen saver passwords, and the majority of software/applications via Multi-Factor Authentication;
- a Cyber Security Standard, which covers Artificial Intelligence (AI) guidelines, and third-party providers and systems;
- client data is backed up each evening and stored securely;
- encrypting data sent from your computer to our systems during internet transactions, and customer access codes transmitted across networks;
- employing firewalls, intrusion detection systems, and virus scanning tools to protect against unauthorized persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- providing secure storage for physical records; and
- a Cyber Incident Response Plan and a Data Breach Response Plan.

In the event you cease to be a client of this organization, any personal information which we hold about you will be maintained securely for a minimum period of 7 years in order to comply with legislative requirements. Where information we hold is identified as no longer needed for any purpose, we ensure it is effectively and securely destroyed.

We are required to give notice to the Office of the Australian Information Commissioner (OAIC) and affected individuals of an "eligible data breach." This means that if we hold personal information about you, and there is unauthorized access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

## Contact Us

If you seek any further information from the Group about our Privacy Policy, please contact Infocus who assist Clime with Privacy Statements at:

**Email:** Professional.Standards@infocus.com.au

**Address:** Level 2, Cnr Maroochydore Road & Evans  
Street Maroochydore QLD 4558

**Postal:** PO Box 1856 Sunshine Plaza QLD 4558

**Telephone:** (07) 5406 5000

## How to Complain

We take your privacy seriously. If you have a complaint about your privacy please tell us, as we'd like the chance to fix the problem. The Group have procedures in place to deal with complaints fairly, transparently and quickly.

1. To raise a complaint regarding privacy please contact us on (07) 5406 5000 to discuss your concerns. Alternatively, you can email or write to Infocus who assist Clime with complaint management at:

**Mail:** The Complaints Manager  
Infocus Securities Australia Pty  
Ltd (Infocus)  
PO Box 1856, Sunshine Plaza QLD 4558

**Email:** Professional.Standards@Infocus.com.au

2. Your complaint should include details of your privacy concerns, a brief summary of the facts relating to your complaint, and how you believe we can resolve the matter to your satisfaction.

3. Clime will investigate your complaint and will make every effort to ensure you receive a fair and prompt reply. For complaints relating to financial services, we provide you a written response within 30 calendar days of receiving your complaint. We will keep you informed of the progress of your complaint if this investigation cannot be resolved within this time.

4. If you are unhappy with our response, or have not received a response within the required timeframe, you can lodge a complaint with the Australian Financial Services Complaints Authority (AFCA).

5. Clime is a member of the external complaints resolution scheme operated by the AFCA. AFCA provides free advice and assistance to customers not satisfied with the responses provided by member companies to their complaints. AFCA may undertake an independent external investigation of the complaint or enquiry. Member companies like Clime are bound by any decisions made by AFCA.

You can contact the Australian Financial Complaints Authority by:

**Phone:** 1800 931 678

**Mail:** Australian Financial Complaints Authority  
GPO Box 3  
Melbourne VIC 3001

**Website:** www.afca.org.au

**Email:** info@afca.org.au

## Members of our Group

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The Clime Group includes Clime Investment Management Limited ABN 37 067 185 899 and its related bodies corporate. It also includes Corporate Authorised Representatives and Authorised Representatives of our wholly owned Australia Financial Services Licensees (AFSLs) .

Members of the Group that have collected personal information are permitted by the Privacy Act 1988 (Cth) to disclose personal information to other members of the Group. This enables the Group to have an integrated view of its clients.

## Related Parties

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Entities of our group and a brief description of the services they provide are outlined below. Each entity and their representatives are liable only for the services provided within their discipline. The following entities are all subsidiaries of Clime Investment Management Limited ABN 37 067 185 899

- Clime Advice Pty Ltd 35 122 720 512 is the holder of the Australian Financial Service Licence No. 308200 provides financial services;
- MTIS Wealth Management Pty Ltd 29 641 379 857 is a Corporate Authorised Representative of Clime Advice Pty Ltd and provides financial services;
- Ralton AM Pty Limited 31 639 028 809 is a Corporate Authorised Representative of Clime Asset Management Ltd and provides financial services;
- Proactive Portfolios Pty Ltd 52 141 064 717 is a Corporate Authorised Representative of Clime Asset Management Ltd and provides financial services;
- Stocks In Value Pty Ltd 43 162 644 724 is a Corporate Authorised Representative of Clime Asset Management Ltd and provides financial services;
- Clime Asset Management Pty Limited 72 098 420 770 is the holder of the Australian Financial Service Licence No. 221146 and provides financial services;
- Clime Private Wealth Pty Ltd 87 617 235 168 is a Corporate Authorised Representative of Clime Advice Pty Ltd and provides financial services.