

Privacy Policy

Effective date: 3 September 2021

Read about how W Four Holding Pty Ltd (ABN 91 612 106 617) and its subsidiaries and related parties (the '**Westwood Group, us, we or our**') collects, protects, uses and shares your personal information.

Privacy commitment

Your privacy is important to us. We are committed to protecting your privacy and we want to ensure that you have a clear understanding about the information we collect about you, how we use it and who we share it with.

We provide a number of products and services that require us to collect, store, share and use personal information. This Privacy Policy applies when you use our products or services, or interact with us or our website. It sets out how we collect information about you, how we use it and how we keep it secure.

We may change this Privacy Policy by publishing changes to it on our website. Please check our website regularly to ensure that you are aware of any changes to this Privacy Policy.

What information do we collect?

Personal information is information about you that is reasonably identifiable (i.e. name, email address, contact details).

In this Privacy Policy we use the term **personal information** to refer to both personal information and credit information.

The information we may collect (and hold) about you includes:

- name, address, email address, date of birth, phone number(s);
- tax file number;
- information about dependents or family members;
- Medicare number, pension card number;
- accounting and financial information;
- occupation, employment history and details;
- family commitments and social security eligibility;
- financial needs, objectives and investment experience;
- assets and liabilities (current and future), income, expenses;
- superannuation and insurance details;
- risk profile details and risk appetite;
- details of your interactions with us;
- any other relevant information that you give to us for the purpose of providing you with our products or services.

Depending on the services we provide to you we may also collect sensitive information from you such as health information in connection with insurance application forms.

We collect personal information either directly from you or from other people such as:

- related entities of the Westwood Group and our subsidiaries;
- suppliers and service providers in connection with providing our products and services;
- your advisers;
- banks, financial institutions and other financial product providers;

- fund managers;
- superannuation funds;
- life insurance companies;
- public sources.

We collect information when you:

- visit our website;
- submit application forms with us;
- enter into contracts with us;
- participate in a phone call with us;
- email or otherwise correspond with us.

Why we collect, hold, use and disclose personal information

We will only use your personal information for the purposes for which it was collected (**primary purpose**) or for a purpose related to the primary purpose, if you would reasonably expect us to use the information for that purpose, or otherwise with your consent.

Our primary purposes for collecting, holding, using and sharing (disclosing) your personal information include but are not limited to:

- to facilitate the conduct of our business;
- to provide our products, services and customer support;
- to provide you with financial advice, recommendations and planning and/or to facilitate the provision of advice, products or services by third parties to give effect to your financial plan;
- to send you information about events, products, services and opportunities that may be of interest to you;
- to conduct market research (where we contact you for feedback on our products or services);
- to run and improve our website including your experience with our website;
- to identify and control or minimise risks to our products or services;
- to enable us to detect and prevent suspicious or fraudulent activity;
- to monitor compliance with our terms and conditions;
- to provide information to our advisers, including lawyers, auditors and accountants, to help us comply with legal, accounting, or security requirements;
- to protect our legal rights, interests and the interests of others, including in connection with legal claims, compliance, regulatory and audit functions and ensuring data security;
- to verify your identity pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act;

- to comply with our legal obligations, resolve any disputes that we may have with any of our customers, and enforce our agreements with other people;
- for any purpose related to the above.

Do we use your personal information for direct marketing?

We may from time to time use your personal information for direct marketing . However, you can decide not to receive marketing material from us at any time by contacting us using the details set out below or by using the unsubscribe link in any email/SMS.

Sharing (disclosing) your information

We share your personal information with:

- our related entities and affiliates;
- suppliers and service providers in connection with providing our products and services (including but not limited to trustees, trust companies, custodians, brokers, OTC Dealers);
- payment systems operators and investment platforms;
- banks or other financial institutions;
- superannuation funds;
- insurance companies, including life insurance companies;
- financial product issuers;
- a purchaser of our business;
- specific people authorised by you to receive information held by us;
- regulated stock exchange;
- our auditors;
- government agencies, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law including but not limited to the Australian Taxation Officer (ATO), Australian Securities and Investment Commission (ASIC), the Australian Transaction Reports and Analysis Centre (AUSTRAC);
- The Australian Financial Complaints Authority (AFCA);
- Your spouse in accordance with the Family Law Act requirements

Information that we provide to other people will be handled in accordance with their privacy policy.

The Westwood Group may also disclose your personal or sensitive information for other purposes if we notify you of the disclosure at or about the time of collecting the information, we have otherwise received your consent, or the disclosure is required or authorised by law.

Sharing (disclosing) your information outside Australia

Some of the parties that the Westwood Group discloses your personal information to may be located outside Australia, including technology service providers located in the Philippines, India and United States of America. We also disclose your personal information to the related companies of the Westwood Group located in the United States of America.

Using our website and cookies

We may also collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

Links

Our website may contain links to websites operated by other people. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in any linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so please read them before using those websites.

How we hold your information to keep it safe

We hold your personal information in either electronic or hard copy form.

We take reasonable steps to protect your information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. We use a number of physical, administrative, personnel and technical measures to protect your personal information.

For example we:

- impose confidentiality requirements on our employees and train them about how to keep your information safe and secure;
- have policies and procedures in relation to document storage security and security measures to govern access to systems;
- implement firewalls and virus scanning tools to stop viruses and unauthorised access to our systems;
- maintain secured files and buildings;
- destroy and de-identify data when it is no longer required.

However, we cannot guarantee the security of your information.

Rights to access your information or seek correction

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your information.

If you think that any information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Right to remain anonymous

You can choose not to provide us with personal information. However, if you do this, we may not be able to provide you with any products or services, or you may significantly limit the quality and completeness of the service we can provide to you

Do we disclose credit information to credit reporting bodies?

We do not disclose any of your credit information to credit reporting bodies including for the purpose of requesting a credit check on you.

How to complain

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time.

If you are not satisfied with how we have dealt with your complaint you can contact the Office of the Australian Information Commissioner using any of the following details:

GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992
www.oaic.gov.au

Contact Us

For further information about our Privacy Policy or privacy practices, to access or correct your information, or make a complaint, please contact us using the details set out below:

Privacy Officer
E: mail@westwoodgroup.com.au
A: PO Box 332, Fortitude Valley, Queensland 4006