



POLICY DOCUMENT

PRIVACY POLICY AND COLLECTION STATEMENT

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Introduction

Hewison & Associates Pty Ltd ABN 51 006 082 257 trading as Hewison Private Wealth (referred to as HPW, we, our, us) is bound by the Australian Privacy Principles ('APPs') under the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Policy outlines how HPW manages and protects personal information and the practices, procedures and systems in place to ensure compliance with the Privacy Act and the APPs.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by HPW must abide by this Privacy Policy. HPW makes this Policy available free of charge and can be downloaded from its website

www.hewison.com.au.

In this Privacy Policy:

- **Disclosure** of information means providing information to persons outside of HPW;
- **Personal information** means information or an opinion relating to an individual, which can be used to identify that individual;
- **Privacy Officer** means the contact person within HPW for questions or complaints regarding HPW's handling of personal information;
- **Sensitive information** is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information; and
- **Use** of information means use of information within HPW.

What kind of personal information do we collect and hold?

As a financial advisory organisation, we are subject to certain legislative and regulatory requirements which necessitate us collecting and holding certain personal information about you. The kinds of personal information we collect may include:

- name;
- address;
- phone numbers;
- email addresses;
- employment details and employment history;
- details of your financial needs and objectives;
- details of your current financial circumstances, including the individual's assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- details of your investment preferences and tolerance to risk;
- bank account details;
- drivers' licence details;
- health information; and
- other information that is relevant to the services that we provide.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

How we use personal information

We generally collect personal information directly from you during face-to-face interviews, over the telephone or when you complete an online client engagement form. We may also collect your personal information through our application processes, forms and other interactions with you while providing you with our services, including when you visit our website, use a mobile app from us, call us or send us correspondence.

Sometimes we may collect personal information about you from a third party. When we are provided with personal information from a third party, we will take reasonable steps to ensure that you have been made aware of the matters set out in this Privacy Policy. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

HPW will not collect sensitive information unless you have consented or an exemption under the APPs applies. These exemptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services, or meet your needs appropriately.

HPW does not give you the option of dealing with us anonymously, or under a pseudonym. This is because it is impractical, and in some circumstances illegal, for HPW to deal with individuals who are not identified.

Unsolicited personal information

HPW may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold other personal information.

Who do we collect personal information about?

The personal information we may collect and hold includes (but is not limited to) personal information about the following individuals:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

Website collection

We collect personal information from our website Hewison.com.au when we receive emails and completed online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. The Privacy Policy is available by clicking on the privacy button on our website.

To use our website, you must consent to our use of cookies. You can withdraw or modify your consent to our use of cookies at any time. If you no longer wish to receive cookies you can use your web browser settings to accept, refuse and delete cookies. To do this, follow the instructions provided by your browser. Please note that if you set your browser to refuse cookies, you may not be able to use all the features of our website.

Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information. Cookies are small text files which are transferred to your computer's hard drive through your web browser that enables our website to recognise your browser and capture and remember certain information.

We also use cookies to understand how users interact with our website, to compile aggregate data about our website traffic, including where our website visitors are located, and interaction so that we can offer better user experiences.

We also use analytics on the site. We do not pass any personally identifiable information through this function; however, the data we collect may be combined with other information which may be identifiable to you.

Why does HPW collect and hold personal information?

We may use and disclose the information we collect about you for the following purposes:

- to provide the financial services requested by you, including providing you with financial advice, reviewing financial plans and investment recommendations, and administering your financial affairs;
- to complete documentation and forms;
- to consider and assess your request for a product or service;
- to provide you with information about a product or service;
- let you know about other services we offer, send you information about special offers or invite you to events;
- to conduct our business and perform other management and administration tasks;
- to consider any concerns or complaints you may have;
- provide you with information we believe may be relevant or of interest to you;
- to comply with relevant laws, regulations and other legal obligations, such as the *Corporations Act 2001 and Anti-Money Laundering and Counter-Terrorist Financing Act 2006*; and
- to help us improve the financial services offered to our clients, and to enhance our overall business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

Who may we disclose personal information to?

We may disclose personal information to:

- a related entity of HPW;

- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisors;
- professional external auditors;
- organisations involved in a transfer or sale of all or part of our assets or business (you will be advised of any such transfer or sale);
- organisations involved in managing payments, including payment merchants and other financial institutions such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- superannuation fund trustees;
- insurance providers;
- other financial product issuers; and
- anyone else to whom you authorise us to disclose it or is required by law.

We engage other people to perform services for us, which may involve that person handling personal information we hold about you. In these situations, we ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any contractor whom it is disclosed in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

Sending information overseas

We may disclose personal information to contractors and suppliers located that are located outside Australia in some circumstances. These recipients may be located in the following countries:

- It is not practical to list all the countries in which personal information is likely to be disclosed, however, they are likely to include the United States of America, the Philippines, India and Malaysia.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act, and the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act

Management of personal information

HPW recognises how important the security of personal information is to our clients. We will at all times seek to ensure that the personal information we collect, and hold is protected from misuse, interference and loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. Access to our business premises is controlled by security passes which regulate entry permissions.

In relation to our computer-based information, we apply the following guidelines:

- passwords are required to access the system, and passwords are routinely checked,
- data ownership is clearly defined;
- data is backed up each evening;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- the system automatically limits the amount of personal information appearing on any one screen;
- unauthorised employees are barred from updating and editing personal information;
- all personal computers which contain personal information are secured, physically and electronically;
- data is encrypted during transmission over the network;
- print reporting of data containing personal information is limited;
- HPW has created procedures for the disposal of personal information; and

Where our employees work remotely or from home, we implement the following additional security measures:

- two-factor authentication is enabled for all remote working arrangements;
- password complexity is enforced, along with the use of a password manager;
- we ensure that employees only have access to personal information which is directly relevant to their duties;
- employees are not permitted to work in public spaces;
- we monitor access to personal information, and will investigate and take appropriate action if any instances of unauthorised access by employees are detected;
- employees must ensure that screens are angled so that they cannot be used by anyone else, and are locked when not in use;
- employees must ensure that no other member of their household uses their work device;
- employees must store devices in a safe location when not in use;
- employees may not make hard copies of documents containing personal information, nor may they email documents containing personal information to their personal email accounts; and
- employees may not disclose an individual's personal information to colleagues or third parties via personal chat groups.

Where we no longer require the personal information for a permitted purpose under the APPs and are no longer required to hold the information by law, we will take reasonable steps to destroy it.

Use of Artificial Intelligence (AI)

The use of AI tools within HPW is conducted in a manner that safeguards your privacy, security, and complies with the APPs and Privacy Act.

When using commercially available AI products, HPW ensures that the privacy obligations apply to any personal information input into an AI tool, as well as the output data generated by AI where it contains personal information.

We will not utilise your personal information to train AI systems without first obtaining your explicit, informed consent. You will have the opportunity to decline participation in any AI-related information usage.

Due diligence is conducted on all AI tools to ensure they are suitable for the intended uses, including considering potential privacy and security risks, and who will have access to personal information.

We will not enter your personal information into publicly available generative AI tools.

Direct marketing

HPW may use personal information collected from you for the purposes of direct marketing if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. You can contact us to opt out of receiving direct marketing material and will give effect to the request within two weeks. You may also request that we provide you with the source of their information. If such a request is made, we will notify you of the source of the information free of charge within two weeks.

Identifiers

We do not adopt identifiers assigned by the Government (such as drivers' licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies

Keeping personal information accurate and up to date?

We will endeavour to always ensure that, the personal information about you which we hold is up to date and accurate. If you become aware or believe that any personal information which we hold about you is inaccurate, incomplete or outdated you may contact us by any of the methods detailed below and update the information.

Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

Access to personal information

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting your Adviser. We will provide information within

30 days of your request. If we refuse to provide the information, we will provide reasons for the refusal.

Your request for access to your personal information will be dealt with either by providing you with copies of the information requested, by allowing you to inspect the information or providing you with an accurate summary of the information held.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

Updates to this policy

This Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

Responsibilities

It is the responsibility of management to inform employees and other relevant third parties about the HPW Policy. Management must ensure that they advise employees and other relevant third parties of any changes to the Privacy Policy.

All new employees are to be provided with timely and appropriate access to this Privacy Policy, and all employees are provided with training in relation to appropriate handling of personal information.

Non-compliance and disciplinary actions

Privacy breaches must be reported to management by employees and relevant third parties. Ignorance of the HPW Privacy Policy will not be an acceptable excuse for non-compliance. Employees or other relevant third parties that do not comply with HPW's Privacy Policy may be subject to disciplinary action.

Inquiries and complaints

We have an effective complaints handling process in place to manage privacy risks and issues.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business.

If you have any questions about our privacy procedures, or if wish to make a complaint about how we have dealt with your personal information you may lodge a complaint to the Managing Director. It is our intention to use our best endeavours to resolve any complaint to your satisfaction.

- by telephoning – (03) 8548 4800
- by writing to – Managing Director – Level 8,417 St Kilda Road, MELBOURNE VIC 3004
- by emailing – info@hewison.com.au

What if I am not satisfied with the response?

If you are not satisfied with the result of your complaint to HPW you can also refer your complaint to the Office of the Australian Information Commissioner.

You can contact the Office of the Australian Information Commissioner:

- by telephoning - 1300 363 992
- by writing to - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- online submission – https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC

Contractual arrangements with third parties

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy. Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by HPW.

If you have any concerns in relation to the disclosure of your personal information to third parties, please contact us.