

PRIVACY POLICY

GEM Capital Financial Advice Pty Ltd, AFSL Licence 502836 is committed to providing professional services and respecting the privacy of your personal information. We bound by the Australian Privacy Principles under the Privacy Act 1988.

This policy explains how GEM Capital Financial Advice Pty Ltd will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

Collection of Personal Information

GEM Capital Financial Advice Pty Ltd collects and maintains personal information that is necessary to enable us to deliver our services or products or otherwise for our primary business functions and/or activities.

In the normal course of our business we only collect information about you when you provide it to us or it is provided to us under your authority.

We will collect personal information directly from you when you apply for a product or a service which we are obliged by to do by law prior to providing you with a product or service.

On occasions we may collect personal information about you from third parties, for example credit reporting agencies, share registries or regulatory authorities. Information that we collect will be limited to that required to provide you with our services.

What type of information does GEM Capital Financial Advice Pty Ltd hold?

The type of information we collect and hold about you varies depending on the type of product or service you require. For example, GEM Capital Financial Advice Pty Ltd will hold different information about you if you have a life insurance policy than we will hold if you have a managed investment.

The personal information we hold about you may include:

- employment details and employment history;
- details of your financial needs and objectives;
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- details of your investment preferences and aversion or tolerance to risk;
- information about your employment history, employment circumstances, family commitments ;
- Social security eligibility; and
- Any other relevant information that you provide to us to enable us to provide suitable recommendations.
- We may also need health information from you to provide you with risk advice.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

We will only collect, maintain and use your Personal Information to adequately provide the services you have requested including:

- the preparation of a financial recommendations;
- the provision of financial planning and credit activities to you;
- making financial recommendations;
- reviewing your financial position, risk management and objectives;
- reviewing your financial holdings.

In most circumstances, the information that we hold about you has been provided to us by you or under your authority. If we have received information that is not required to provide services to you, we will either advise you that we hold this information or destroy it.

Other purposes for which we may need to collect and use your personal information will include:

- To comply with legislative and regulatory requirements (including the AML/CTF 2006 Act,
- To enable us to perform administrative operations such as accounting, record keeping, and archival retrieval;
- To enable us to contact you when conducting marketing and inviting you to events that you may be interested in; and
- Tell you about new services and/or products we can offer (unless you tell us not to contact you with this type of information.)

You may choose not to provide us with your personal information. In this case we would not be able to deal with you including providing a financial product. Under the AML/CTF laws we must be able to identify our clients and verify that identity.

How does GEM Capital Financial Advice Pty Ltd use this information?

We use this information to provide you with products or services, to assess your risk tolerance and determine strategies and recommendations consistent with your financial needs, objectives and personal circumstances.

We may also use your personal information to provide you with advice and services about the following products.

- Life insurance products, such as insurance for your life, permanent disability and income replacement.
- Investment products and services such as managed investment funds and investor directed portfolio services.
- Superannuation products, such as superannuation funds, investments for superannuation funds and investment insurance policies.
- Financial advice and services

The information you provide to us about your health may be used to assess your risk tolerance and appropriate investment recommendations or to determine the suitability and correct pricing of risk products.

We may also use the information to send you material about other products or services. If you do not want to receive this type of material, tell us and we will stop.

Will GEM Capital Financial Advice Pty Ltd disclose your personal information?

GEM Capital Financial Advice Pty Ltd may share information with organisations that assist us to administer your investments or provide you with products and services including our internal and external service providers such as administrators, fund managers and insurance companies. The organisations receiving this information are not permitted to use your information for any purpose other than the specific purpose it was provided.

There are circumstances under which GEM Capital Financial Advice Pty Ltd may disclose your personal information such as:

- When the disclosure is required by law (for example, disclosed to the Australian Taxation Office, AUSTRAC or Centrelink);
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests);
- In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosures will be made in confidence. In the event that a sale of our business is affected, we may transfer your personal details to the purchaser of the business. As a client you will be advised of any such transfer.

We will also disclose your personal information if you give your consent for us to do so.

GEM Capital Financial Advice Pty Ltd will not disclose your personal information to overseas recipients.

We require that these service providers comply with our Privacy Policy.

We do not sell mailing lists or provide client information to parties other than those noted above.

How does GEM Capital Financial Advice Pty Ltd handle a request for access to personal information?

Under the Australian Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can we will answer your question immediately.

We will also try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes we will ask that you put your request in writing, for example, where you want copies of material or access to older information or files which are not current or it is necessary for us to retain record of your request.

We may also ask you to identify yourself to our satisfaction.

There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the Australian Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

We will not charge a fee for making a request to access your personal information however we may charge a fee for accessing your personal information. If a fee is applicable, we will disclose this to you prior to providing you with the information.

Storage and Security

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. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. Your personal information is generally held in your client file which may be in hardcopy or electronic.

In the event you cease to be a client of GEM Capital Financial Advice Pty Ltd, any personal information which we hold about you will be maintained in a secure offsite storage facility for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed. GEM Capital Financial Advice Pty Ltd will ensure that any documents that are destroyed are done so in a secure manner.

Email Communication

As electronic communication becomes more and more part of our daily business lives GEM Capital Financial Advice Pty Ltd will use your email address that you have provided to contact you when necessary or to provide you with information you have requested.

We will also use your email address to alert you to marketing initiatives, newsletters, or events that may interest you.

If at any time you decide you do not wish to receive such marketing information you have the right to ask us not to send you any further such material. You may do this by advising your adviser or by sending us an email with "Unsubscribe" in the subject line. Please allow two weeks for this instruction to take effect.

Website

GEM Capital Financial Advice Pty Ltd compliance with the Australian Privacy principles also applies to your access to our website. Our privacy policy may be accessed from the website and other information is also posted there for your convenience.

Some areas of our website require you to be a client of GEM Capital Financial Advice Pty Ltd and you will be issued with a user name and password which are strictly for your personal use only. GEM Capital Financial Advice Pty Ltd will not be liable for any acts that arise from the use of your user name and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify GEM Capital Financial Advice Pty Ltd immediately if you become aware of a breach of your security.

Our website uses cookies which allows us to identify your browser while you are using our site. Whilst cookies do not identify you, they allow us to track usage patterns. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Collection of your personal information

There are many aspects of the site which can be viewed without providing personal information, however, for access to future GEM Capital Financial Advice Pty Ltd customer support features you are required to submit personally identifiable information. This may include but not limited to a unique username and password, or provide sensitive information in the recovery of your lost password.

If you have objections to the Privacy Policy, you should not access or use the Site.

What if some of the information GEM Capital Financial Advice Pty Ltd holds is wrong?

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested, (or suggest alternative arrangements for updating our records). If we disagree with you, we will give you our reasons and record your objections on file.

How do I make further enquiries or complain about a breach of privacy?

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and direct your complaint to the Privacy Officer. We will respond to your complaint within 7 days. We will use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

Name: Mark Draper

Address of the Licensee: 154 Goodwood Road, Goodwood SA 5034

Telephone: 08 8273 3222

Email: mrdraper@gemcapital.com.au

Website: www.gemcapital.com.au

Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time but will advise you of any material changes.