



Privacy Policy

1. Introduction

WealthStream Financial Group Pty Ltd [152 803 113] (referred to as **WealthStream we, our, us**) is bound by the Privacy Act 1988 (**Privacy Act**), including the Australian Privacy Principles (**APPs**) and recognises the importance of ensuring the confidentiality and security of your personal information.

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

In this Policy and Collection Statement:

- **Credit information** is personal information (other than sensitive information) that relates to an individual's credit history or credit worthiness, and is further defined in the Privacy Act. Credit information includes information that we have obtained from third parties, including individuals, other lessors, credit providers, and credit reporting bodies ('CRBs');
- **Disclosure** of information means providing information to persons outside of WealthStream;
- **Personal information** means information or an opinion relating to an individual, which can be used to identify that individual;
- **Compliance Team** means the contact person within WealthStream for questions or complaints regarding WealthStream'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 WealthStream.

2. What Kind of Personal Information Do We Collect and Hold?

We may collect and hold a range of personal information about you to provide you with our services, including:

- name;
 - address;
 - phone numbers;
 - email addresses;
 - occupation;
 - bank account details;
 - drivers' licence details;
 - financial and credit information, including:
 - details of assets, liabilities, income, expenses;
 - information about your consumer credit liabilities, such as the name of an entity that has provided you with credit, the date of the credit was provided and the maximum amount of credit made available;
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- information about your repayment history, such as whether you were late in making a monthly repayment and when repayments were due;
- the type and amount of credit you sought in an application;
- whether you are 60 days or more overdue in making a repayment of \$150 or more;
- whether you have repaid overdue payments;
- information about new credit arrangements you have entered into as a result of defaulting in repayments;
- information about court judgements against you in relation to credit that has been provided to you;
- publicly available information that relates to your credit worthiness;
- information recorded in the National Personal Insolvency Index about you;
- our opinion as to whether you have committed a serious credit infringement in relation to consumer credit provided by us;
- any other personal information that may impact our assessment of your credit worthiness;

3. How We Collect Personal Information

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our products and services, including when you visit our website, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, credit providers or Credit Reporting Agencies (**CRB**). If so, we will take reasonable steps to ensure that you are made aware of this Policy and Collection Statement.

We will not collect sensitive information about you without your consent unless an exemption in the APP's (Australian Privacy Principles) applies. These exceptions 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.

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

4. Unsolicited Personal Information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, 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 your other personal information.

5. Who Do We Collect Personal Information About?

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

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

6. Website Collection

We collect personal information from our web site www.wealthstream.com.au when we receive emails and online forms.

7. Why Do We Collect and Hold Personal Information?

We may use and disclose the information (including credit information) we collect about you for the following purposes:

- provide you with our products and services;
- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business.

We may use and disclose your personal information (excluding credit 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.

8. Who Might We Disclose Personal Information To?

We may disclose personal information (including credit information) to:

- a related entity of WealthStream;
 - an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, other advisors; or our audit team.
 - organisations involved in a transfer or sale of all or part of our assets or business
 - organisations involved in managing payments, including payment merchants and other financial institutions such as banks;
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- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers and credit providers; and
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy and Collection Statement.

We may disclose the following personal information to CRBs, in order to comply with our obligations under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)* (**AML/CTF obligations**):

- name;
- date of birth; and
- residential address.

The purpose of disclosing this information is to enable us to verify whether the personal information collected matches the identification information held by the CRB. We may, upon request, provide you with an alternative method of verification, however, any alternative verification method must also comply with the AML/CTF legislation.

9. How Do We Use and Disclose Credit Information?

We use your credit information to manage how we provide our services to you. We may disclose your personal information (including credit information about your credit liabilities, repayments and defaults) to CRBs. We may also collect this information from CRBs.

We will only disclose credit information to:

- a related body corporate;
- a person who will be processing your application for credit;
- a person who manages credit services provided by us, for use in managing those credit services;
- another credit provider if we believe you have committed a serious credit infringement, or you have consented to the disclosure;
- to a person considering whether to act as a guarantor or offer property as security and you have expressly consented to the disclosure;
- a debt collector;
- an external dispute resolution scheme of which we are a member;
- a CRB; or
- any other person or entity that is entitled or authorised by law to require us to disclose it.

If we intend to provide default information about you to a CRB, we will give you at least 14 days' written notice. If we disclose default information to a CRB, and you subsequently repay the amount owed, we will tell the CRB you have repaid the amount owing.

Information about credit reporting, including the contact details of the CRBs we deal with, how we or a CRB may use your information, how to access our policies and your rights in relation to your credit information, is available at www.wealthstream.com.au. You can request to have this information provided in hard copy by contacting our Privacy Officer.

10. Sending Information Overseas

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, the APPs and the Credit Reporting Privacy Code;
- 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.

11. Management of Personal Information

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or 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. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network;

12. Direct Marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent 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.
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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. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

13. Identifiers

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

14. How Do We Keep Personal Information Accurate and Up to Date?

We are committed to ensuring that the personal information it collects, uses and discloses is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. 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.

15. Accessing Your 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 WealthStream's Compliance Team. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required.

16. Updates to This Policy and Collection Statement

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

17. Responsibilities

It is the responsibility of management to inform employees and other relevant third parties about this Policy and Collection Statement. Management must ensure that employees and other relevant third parties are advised of any changes to this Policy and Collection Statement.

All new employees are to be provided with timely and appropriate access to this Policy and Collection Statement, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Policy and Collection Statement may be subject to disciplinary action.

18. Non-Compliance and Disciplinary Actions

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

19. Incidents/Complaints Handling/Making A Compliant

We have an effective complaint 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.

You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with the WealthStream Compliance Team.

If you have any questions about this Policy and Collection Statement, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

- writing – WealthStream Compliance, Suite 4 Ground Floor, 25 Ryde Road, Pymble NSW 2073.
- emailing using our website contact form

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- telephoning - 1300 363 992
- writing - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- emailing - enquiries@oaic.gov.au

20. Contractual Arrangements with Third Parties

We ensure that all contractual arrangements with third parties adequately address privacy issues, and make third parties aware of this Policy and Collection Statement.

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 us.

21. Your Rights

This Privacy Policy and Collection Statement contains information about how:

- you may access the personal information we hold about you;
 - you may seek the correction of your personal information; and
 - you may ask us to provide an alternative means of identity verification for the purposes of the *Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)*;
 - you may complain about a breach of the Privacy Act, including the APPs; and
 - we will deal with a privacy complaint.
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22. Credit Reporting

We may also disclose your personal information (including credit information about your credit liabilities, repayments and defaults) to CRBs. We may also collect this information from CRBs.

Information about credit reporting, including the contact details of the CRBs we deal with, how we or a CRB may use your information, how to access our policies and your rights in relation to your credit information, is available at www.wealthstream.com.au. You can request to have this information provided in hard copy by contacting our WealthStream Compliance Team.

Acknowledgment:

- I have read WealthStream's **Privacy Policy** and the **Website Terms and Conditions**
 - I authorise you to act as my agent** in seeking **access to my credit information** held by credit reporting bodies and credit providers. This authority applies to your inquiries in connection with the provision of services to me by you in order to verify my personal information (including name, residential address and date of birth) for Anti-Money Laundering and Counter Terrorism Financing purposes.
 - I consent to you **collecting sensitive information about me** for the purposes of you providing services to me.
 - I consent to you **sending my personal information to the recipients located outside Australia** as described in the Privacy Policy (Section 10).
 - I agree to receive information about your **products, services or promotions** (we WILL NOT spam you).
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ANNEXURE A

Item no:	Obligation:	Australian Privacy Act requirement:
1	Use or disclosure of personal information / data for secondary purpose	WealthStream may use personal information for a secondary purpose if the individual has consented, it is within their reasonable expectations, or another exception applies.
2	Collection of solicited personal information / data	WealthStream will only collect personal information where it is reasonably necessary or when it is directly related to WealthStream's functions or activities, and by lawful and fair means. Sensitive information will only be collected with consent, or where a listed exemption applies.
3	Notification of collection of personal information / data	WealthStream's Privacy Collection Notice is drafted in accordance with the APP requirements.
4	Direct marketing	WealthStream will comply with section 12 of the Privacy Policy. WealthStream may only use or disclose personal information for direct marketing purposes if certain conditions are met. In particular, direct marketing messages must include a clear and simple way to opt out of receiving future messages, and must not be sent to individuals who have already opted out. Sensitive information about an individual may only be used for direct marketing with the consent of the individual.
5	Dealing with unsolicited personal information	WealthStream will comply with section 4 of the Privacy Policy. WealthStream will destroy or de-identify all unsolicited personal information.
6	Cross border disclosure of personal information	In accordance with section 10, before WealthStream discloses personal information to an overseas recipient, it must take reasonable steps to ensure that the recipient does not breach the APPs in relation to that information. Personal information may only be disclosed where the recipient is subject to a regulatory regime that is substantially similar to the APPs, where the individual has consented, or another listed exception applies.
7	Correction of personal information	In accordance with section 14, WealthStream takes reasonable steps to correct personal information they hold about an individual, on request by the individual.
8	Consent	WealthStream ensures that when obtaining consent from an individual, the following elements are complied with: the individual is adequately informed before giving consent the individual gives consent voluntarily the consent is current and specific; and the individual has the capacity to understand and communicate consent.
9	Data breach notification	From July 2019 WealthStream has in place policies and procedures which comply with the mandatory data breach notification scheme.
10	Complaints	In accordance with section 19, individuals may lodge a complaint about WealthStream's handling of their personal information with the Office of the Australian Information Commissioner.

Item no:	Obligation:	Australian Privacy Act requirement:
11	Right to restriction of processing	Nil
12	Right to be forgotten	WealthStream will destroy or de-identify personal information that they no longer require for a lawful business purpose (section 4).
13	Data profiling	Nil
14	Monitoring behaviour	Nil
