BLUEOCEAN

PRIVACY POLICY

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Blue Ocean Wealth Management is an authorised Representative of InterPrac Financial Planning Pty Ltd ABN 14 076 093 680, Australian Financial Services Licence Number: 246638

Privacy Policy

The privacy of your personal information is important to us at Blue Ocean Wealth Management. We are required to comply with the Australian Privacy Principles. Whenever we handle personal information, we take steps to ensure that appropriate standards of privacy and security are applied. This notification covers us and tells you how we collect your information, how it is stored, what we use it for and who we share it with. The Policy also described how you can access or correct information we hold about you, how you can ask further questions or make a complaint and information about out websites and online activities.

For a copy of our Privacy Policy, please ask us.

Collecting Your Personal Information

We collect your personal information for a variety of purposes. These include providing you with financial services you have requested such as providing financial advice and managing your financial adviser's relationship with you. The kind of information that we may collect from you in order to provide you with financial services includes:

- your name
- contact details and date of birth
- employment details and history
- financial details including information about your financial needs and objectives,
- your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation
- details of your investment preferences and risk tolerance
- family circumstances and social security eligibility
- any other information that we consider necessary.

The personal information collected may include sensitive information, which will only be collected if it is relevant to your product or the service or function you are engaging us to provide. We will not collect sensitive information about you where this is expressly prohibited by law. Sensitive information includes information relating to:

- Race
- Political or religious beliefs
- Sexual orientation and sexual life
- Criminal convictions
- Membership of professional and trade associations or unions
- Biometric and health information
- Information about your affiliation with certain organisations, such as professional associations

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

If the personal information requested by your financial advisers is not provided, your financial adviser and Blue Ocean Wealth Management may not be able to provide you with financial services, including providing you with financial advice that is appropriate to your financial needs, objectives and circumstances.

Laws required to collect Personal Information

We are required or authorised to collect:

- Certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- Your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth); and;
- Certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth);

How your Personal Information is held

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia by external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- Access to information systems is controlled through identity and access management;
- Employees are bound by internal information security policies and are required to keep information secure;
- All employees are required to complete training about information security; and;
- We regularly monitor and review our compliance with internal policies and industry best practice;

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Disclosure of your Personal Information

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. The types of service providers that may be provided with your personal information are:

- Other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners
- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested
- Organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services
- Your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank
- Organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer
- Government authorities and other organisations when required by law
- Organisations that you have consented to your personal information being disclosed to.

We may also, from time to time, use your personal information (excluding sensitive information) for the purposes of direct marketing to you. Generally, we will only provide you with direct marketing if you have consented for us to do so, and you are able to opt out of receiving direct marketing from us at any time by contacting your financial adviser.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

the primary purpose for which it was collected or a related secondary purpose where you have consented to the use or disclosure

in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Electronic Collection of Personal Information

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- Which pages are viewed;
- How users navigate through the site and interact with pages (including fields completed in forms and applications completed);
- Location information about users;
- Information about the device used to visit our website; and;
- IP addresses.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience. One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Blue Ocean Wealth site.

We won't ask you to supply personal information publicly over any social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Accessing your Personal Information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request access please contact us (see "Contacting Us and Privacy Issues" below).

Correcting Your Personal Information

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and provide us with evidence that it is not accurate, complete and up-to-date. If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information a statement claiming that the inf

Resolving your Privacy Concerns and Complaints

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within 30 business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response. If you are unhappy with our response, there are other bodies you can go to.

The Australian Financial Complaints Authority (AFCA) provides fair and independent financial services complaint resolution that is free to consumers.

- Website: <u>www.afca.org.au</u>
- Email: <u>info@afca.org.au</u>
- Telephone: 1800 931 678 (free call)
- Address: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

- Website: <u>www.oaic.gov.au/privacy</u>
- Email: <u>enquiries@oaic.gov.au</u>
- Telephone: 1300 363 992
- Address: GPO Box 5218
 Sydney NSW 2001

Alternatively, you can contact us:

- Phone: 1800 303 808
- Email: info@blueoceanwealth.com.au