



Privacy Policy Statement

Your privacy is important to us

Visia Licensee Service Pty Ltd ('Visia') respects your privacy and is committed to protecting your privacy. At Visia, we understand the importance you attach to information that identifies you (your 'personal information') and we want to help you protect it.

This statement outlines our policy on how we manage the personal information we hold about our customers.

We respect the confidentiality of information and the privacy of individuals. We are bound by the National Privacy Principles contained in the Commonwealth Privacy Act.

Our Privacy Policy Statement will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by our most current Privacy Policy Statement.

Our privacy policy is based on openness

We are committed to being open about how we use personal information.

Where our documents ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

How we collect personal information from you

We will only collect personal information which you have voluntarily provided to us or consented to us collecting the information. We may collect personal information about you in a variety of ways, for example:

- When you visit or use our website;
- When you receive our Financial Services Guide (FSG)
- When you agree to our services;
- When you register for secure access to our website and login to your account on our website (if applicable);
- When you contact us or our associated entities, for example by mail, email or telephone;
- When you apply for employment with us; and
- From third party entities, such as law enforcement agencies and other government or regulatory bodies.

From time to time, you may be able to visit our website or deal with us anonymously or by pseudonym. However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

Why do we collect personal information?

We are compelled by Australia laws (Corporations Act 2001 and regulatory framework) to collect personal information about you if you seek our services. Our business is to provide financial planning advice and other services to help individuals understand their financial needs and make financial and investment decisions. To do this effectively, we need to collect certain personal information.

What kind of personal information do we ask for?

Because of the nature of the services provided, government regulations and taxation laws, we ask for a range of personal information from our customers.



The type of personal information we may collect from you includes (but is not limited to):

- Names, address, email, phone numbers and job titles;
- Information in documents such as passport or driver's licence;
- Tax File Numbers (TFNs) and other identification numbers such as Medicare number;
- Date of birth and gender;
- Financial information:
- Details of superannuation and insurance arrangements;
- Sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties;
- Bank account details, shareholdings and details of investments;
- Educational qualifications, employment history and salary;
- Visa or work permit status; and
- Personal information about your spouse and dependants

We obtain most of the information directly from our customers in the course of providing financial planning advice and ongoing customer service. We may also obtain information from other sources.

We may ask for other information voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers.

If you choose not to provide the information, we need to fulfil your request for a specific service, we may not be able to provide you with the requested service.

How do we use this information and who may we disclose it to?

Visia and our associated entities will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as financial planning or investment services.

We may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), monitoring and improving our website, keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

Unless you are informed otherwise, the personal information we hold is used to enable us to provide you with the services that you have requested, to review your ongoing needs, to enhance customer service and available options and giving you ongoing information or opportunities that we believe may be relevant to your financial needs and other circumstances.

Depending on the service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- our service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, research or other services
- insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law
- credit reporting or reference agencies or insurance investigators
- anyone authorised by the individual to whom the personal information belongs.

Generally, we require that organisations who handle or obtain personal information as service providers to us acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the National Privacy Principles and this policy.

Important Notice: in the event that the processing or use of your personal information involves the disclosure of any information outside Australia, you acknowledge that by providing us with your personal information, you consent to such overseas disclosure. By consenting to such disclosure, you acknowledge and accept that:



- Visia will not be accountable under the Privacy Act 1988 (Cth) for any breach of your privacy by the overseas recipient; and
- You will not be able to seek redress under the Privacy Act 1988 (Cth) for any breach of your privacy by the overseas recipient.

Visia and its associated entities shall not knowingly provide personal information to any third party for any other purpose without your prior consent unless ordered to do so by a law enforcement body, court of law or other governmental or regulatory body or agency.

Sensitive information is subject to greater restrictions

Some personal information we hold is 'sensitive'.

Sensitive information relates to a person's racial or ethnic origin, membership of political bodies, religions or trade unions, sexual preferences or activities, criminal record, state of health and medical history.

The way we use tax file numbers and information received from a credit reporting agency about an individual is also restricted by law.

Sensitive information is usually needed for applications for death, sickness and disability insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is our policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the customer agrees otherwise, or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this.

Management of personal information

Our staff who handle personal information are trained to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

We will manage the collection, use and disclosure of personal information in accordance with this statement and the Privacy Act.

How do we store personal information?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet or other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

Data breach notification

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth), Visia is required to give notice to the Office of the Australian Information Commissioner (OAIC) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

"Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.



If you are likely to suffer serious harm from a data breach, we will notify you of:

- The nature of the eligible data breach (i.e. how the information was accessed or disclosed);
- The type of information that was accessed or disclosed;
- The steps that we have taken to control or reduce the harm, and those that we plan to take;
- Any assistance we can offer you, such as arranging for credit monitoring;
- Anything that we can suggest you can do to assist yourself or mitigate the harm;
- Whether the breach has also been notified to the OAIC;
- How you can contact us for information or to complain; and
- How to make a complaint with the OAIC.

We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will publish the notification on our website.

There are some circumstances in which we do not have to notify you of a data breach. These include:

- Where we have taken remedial action before any serious harm has been caused by the breach:
- If you have been notified of the breach by another entity;
- If notification would be inconsistent with Commonwealth secrecy laws; or
- Where the OAIC declares that notification does not have to be given.

Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

How do we keep personal information accurate and up-to-date?

We endeavour to ensure that the personal information we hold is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. If you consider that any personal information, we hold about you is not accurate or up to date, you can ask us to update this information by contacting us.

You have the right to check what personal information we hold about you.

Under the Commonwealth Privacy Act, you have the right to obtain a copy of any personal information which we hold about you and to advise us of any inaccuracy. The Act does set out some exceptions to this.

To make a request, you will need to complete an application form verifying your identity and specifying what information you require.

We will acknowledge your request within 14 days and respond promptly to it. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

What if you have a privacy complaint?

If you consider that any of our actions breaches this Privacy Policy Statement or the National Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a privacy complaint, please use the details in the 'Contact Us' section of our website to let us know.

If you are not satisfied with our response to your complaint, you can telephone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.

How to contact us

If you want to:

- Make a general enquiry about our privacy policy
- Change your personal information
- Obtain an application form for access to your personal information

Please contact us by completing the Contact Us section of our website at www.visia.com.au

What is a Cookie and how do we use cookies?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our website, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the website without having to log in each time you visit. We may also use independent external service providers to track the traffic and usage on the web site.

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our website if you choose to disable the cookie acceptance in your browser. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Technology improvements

We are constantly striving to improve functionality on this website through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy, will be notified in this Statement at the time of the change.

Links to third party websites

Our website may have links to external third-party websites that may benefit the user.

External websites should contain their own privacy statements and we recommend you review them when using their websites.

Please note, however, that third party websites are not covered by our privacy policy and these sites are not subject to our privacy standards and procedures.