

PRIVACY POLICY

	 <p>Gehde Cole Pty Ltd ABN 78 104 744 498 Trading as Guardian Associates AFSL Number 238281 Member of the Boutique Financial Planning Principals Group</p>
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OUR PRIVACY POLICY

1. Guardian Associates abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001. A summary of the National Privacy Principles is available by contacting our office.
2. As a financial planning organization we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:
 - (a) age and marital status
 - (b) employment details and employment history
 - (c) details of your financial needs and objectives;
 - (d) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
 - (e) details of your investment preferences and aversion or tolerance to risk;
 - (f) information about your employment circumstances, family commitments and social security eligibility.
3. 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.
4. We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested, including:
 - (a) the preparation of your financial plan;
 - (b) the provision of financial planning advice to you;
 - (c) making securities and investment recommendations;
 - (d) reviewing your financial plan;
 - (e) reviewing securities and investment recommendations;
 - (f) making insurance recommendations.
5. We will not use or disclose Personal Information collected by us for any purpose other than:

- (a) the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
 - (b) where you have consented to such disclosure; or
 - (c) where the National Privacy Principles authorize use or disclosure where required or authorized under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an *enforcement body*.
6. We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.
7. We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.
8. We may disclose your Personal Information to superannuation fund trustees, insurance providers, product issuers and other professionals for the purpose of giving effect to your financial plan and seeking confirmation of the appropriateness of any recommendations made by us.
9. We may disclose your Personal Information to product issuers for the purpose of facilitating investments/acquisitions, other financial planners (within our organization) to provide client services during periods of leave.
10. In the event 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 disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected, we may transfer your personal information to the purchaser of the business. As a client, you will be advised of any such transfer.
11. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclose. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets, which are locked out of hours. All record movements off premises are recorded in a central register. All computer based information through the use of access passwords on each computer. Data is backed up weekly and stored securely off site.
12. In the event you cease to be a client of this organization, any personal information which we hold about you will be maintained in a secure off site storage facility for a period of 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.
13. You may at any time, by contacting us by any of the methods detailed below request access to your personal information, and will will (subject to the following exceptions) provide you with access to that information, either by providing you with copies of the information requested, allowing you to inspect the information either by providing you with copies of the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.
14. We will not provide you with access to your personal information if:
- (a) Providing access would pose a serious threat to the life or health of a person;
 - (b) Providing access would have an unreasonable impact on the privacy of others;
 - (c) The request for access is frivolous or vexatious;
 - (d) The information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
 - (e) Providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;

- (f) Providing access would be unlawful'
 - (g) Denying access is required or authorised by or under law;
 - (h) Providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.
15. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.
 16. We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that 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 provide to us evidence of the inaccuracy or incompetencies or outdatedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.
 17. If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.
 18. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent, please indicate this clearly.
 19. If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us by any of the methods detailed below, and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to 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.
 20. You may, at any time, request a copy of our Complaints Handling Policy.
 21. If you would like further information about us keeping your data, please refer to our Data Breach Policy. You may request a copy of this from us at any time.

CONTACT DETAILS

Privacy Officer:
Address: PO Box 3473, Loganholme QLD 4129
Telephone: (07) 5670 3629
Email: invest@guardianassociates.com.au