# **Privacy Policy**

#### Introduction

Orbe Solutions Pty Ltd is committed to protecting your personal information.

We apply the obligations contained in the Privacy Act and the Australian Privacy Principles to our practices for handling personal information.

This summary explains how we collect, use, hold and disclose your personal information. For further details, please refer to the full **Orbe Solutions Pty Ltd Privacy Policy**.

## Personal information that we collect and hold

We collect and hold personal information to enable us to provide financial and credit advice, products and services to you.

We generally obtain your consent before we collect your personal information (unless otherwise permitted by law) and we take reasonable steps to limit the collection of information to what is needed to provide our products and services.

In most instances, we collect your personal information from you through a data collection process, or through product applications. In some circumstances, we may collect your relevant health and medical information.

Some personal information may be collected automatically, whilst navigating through and interacting with the content of our websites and social media, as well as information on your device or computers (such as cookies).

You have the right to not to provide personal information, including about your identity. However, withholding information may impact on the quality and appropriateness of the advice and services we can provide. Further, in some circumstances, the law requires us to obtain and check details of photographic and non-photographic identification documents. We may decline to provide services or advice if we feel we have insufficient information.

#### Handling your personal information

We take all reasonable precautions to protect the personal information we hold about you from misuse, interference and loss, and from unauthorised access, modification or disclosure. The information we collect may be stored either electronically on financial planning software or on secure servers. Paper files are maintained in secure offices. We have a range of practices and policies in place to provide a robust security environment.

Personal information collected may also be used for direct marketing purposes to promote events, products or services that may be of relevance to you. Please contact us should you wish not to receive direct marketing.

Where personal information is no longer required, we take steps to de-identify or securely destroy the information.

#### Sharing your personal information

The most common examples of who we may share your personal information with are:

- Orbe Solutions Pty Ltd related companies
- Financial product and credit product providers
- Financial planning software providers
- External service providers, such as technology service providers, paraplanning and administration services
- Accountants, mortgage brokers, solicitors and other professionals you nominate

We may also disclose personal information to other individuals and companies where necessary to provide you with products and services or for our business operations. In some circumstances, we may be required by law to disclose your personal information to regulators, government agencies or law enforcement agencies.

## Overseas disclosure of personal information

We may disclose your personal information to service providers who operate outside Australia including New Zealand, Japan, South Africa, USA, member states of the European Union, India, Vietnam, Thailand and the Philippines. The purpose of such disclosure is to facilitate the provision of financial services including the preparation of financial advice documents.

Your adviser may enter into their own outsourcing arrangements to countries other than those listed above. If so, your adviser will disclose these arrangements separately to you.

All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act.

## Accessing and correcting personal information

You can request access to personal information we hold. A reasonable fee may apply depending on the information you request and whether it is in physical or electronic format.

You may also ask for corrections to be made. Please contact us for further information. There may be circumstances where we refuse to correct or provide you with the information you request. In these situations, we will inform you and provide an explanation as to why.

#### How can you make a complaint?

We have formal processes to deal with any concerns related to the handling of your personal information. We will acknowledge your complaint within one business day or as soon as practicable. We will respond to complaints within 30 days. Some complex matters may require an extension to thoroughly investigate and resolve. If additional time is required, we will advise you in writing. If you remain dissatisfied with our response, you have the right to lodge a complaint with an independent complaints handling entity, such as the **Office of the Australian Information**Commissioner or for issues about financial advice, investments or mortgage broking – the Australian Financial Complaints Authority. Refer to the full Orbe Solutions Pty Ltd Privacy Policy for their contact details.

### **Orbe Solutions Pty Ltd Privacy Officer**

If you have any privacy-related questions or would like further information on Orbe Solutions Pty Ltd privacy and information handling practices, please contact the Orbe Solutions Pty Ltd Responsible Manager.

**Mail** PO Box 2215, Kent Town SA 5071 **Phone** 08 8364 7100

Email <u>revenue@orbesolutions.com.au</u>

To view the full **Orbe Solutions Pty Ltd Privacy Policy**.