

# ETHICAL INVESTMENT ADVISERS PTY LTD

## PRIVACY COLLECTION STATEMENT



**The privacy of your personal information is important to us.**

### **1. Your adviser will ask you many questions. Why is so much information required?**

We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. Under certain legislation including but not limited to the following (below), we may be authorised or required to collect your personal information:

- Corporations Act 2001,
- Australian Securities and Investment Commissions Act 2001,
- Anti-Money Laundering and Counter Terrorism Financing Act,
- Taxation Administration Act 1953,
- Superannuation Guarantee (Administration) Act 1992 and
- Superannuation (Unclaimed Money and lost members) Act 1999
- Privacy Act 1988 (Cth)

We are required to collect sufficient information to identify a person's needs, objectives, and financial circumstances so that we can provide appropriate financial advice.

We will gather the information by asking you numerous questions about you and possibly your family. We will record this information. We endeavour to retain accurate, complete and up to date personal information about you so we will ask you to review the information from time to time.

At times, we may collect personal information from someone other than yourself and you may not be aware that we collect or have collected this information.

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## **2. Access to personal information**

You can request us to provide you with access to personal information we hold about you by sending us an email: [compliance@ethicalinvestment.com.au](mailto:compliance@ethicalinvestment.com.au) or writing to us at PO BOX 623, Paddington QLD 4064.

We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any fee we charge for providing access will be reasonable and will not apply to lodging a request for access. Your request to access your personal information will be dealt with in a reasonable time.

Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.

## **3. Accuracy and correction**

The accuracy of the personal information we hold about you is dependent to a large degree on the information you provide. You should advise us if you believe that the information we hold about you is inaccurate, incomplete or out of date and we will take reasonable steps to ensure that it is corrected.

You can notify us by sending us an email: [compliance@ethicalinvestment.com.au](mailto:compliance@ethicalinvestment.com.au) or writing to us at PO BOX 623, Paddington QLD 4064

## **4. Providing personal information**

We may provide personal information to:

- organisations (who are bound by strict confidentiality) to whom we outsource certain functions such as our auditors. In these circumstances, information will only be used for our purposes;
- other professionals such as solicitors, accountants and stockbrokers when a referral is required;
- entities based overseas (see below for details);
- third parties when required to do so by law, e.g. legislation or Court Order.

## **5. Overseas disclosure**

We may transfer information to our related or associated entities or external service providers in locations outside of Australia, which may include but not be limited to, India, United States, China, the European Union or the Philippines, in the course of storing that information and when using or disclosing it for one of the purposes referred to above.

When transferring information to foreign jurisdictions, we will ensure that we satisfy the following:

- we will take reasonable steps to ensure the overseas recipient does not breach the Australian Privacy Principles (APP's) in relation to the information;
- we form a reasonable belief that the overseas recipient is subject to a law, or binding scheme, that has the effect of protecting the information in a way that, overall, is at least substantially similar to the way in which the APP protect the information and there are mechanisms that the individual can access to take action to enforce that protection of the law or binding scheme; or
- we will seek your informed consent prior to disclosing your information overseas. Most of the services that we provide are based on an integrated model of professional and reliable service providers that we have selected after thorough due diligence. If you do not agree to us disclosing your information outside Australia to our external service providers, we will not be able to provide services to you.

**Please note:**

- you will not be able to seek redress under the Privacy Act 1988 (Cth) for any breach of your privacy by the overseas recipient, and
- Ethical Investment Adviser will not be accountable under the Privacy Act 1988 (Cth) for any breach of your privacy by the overseas recipient.

## **6. Identifiers**

Although in certain circumstances we are required to collect government identifies such as tax file numbers, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## **7. Dealing with us anonymously or using a pseudonym**

The nature of the provision financial services does not lend itself to treating customers with anonymity. All transactions require personal information about the individual for whom the transaction is being completed. However, in some instances we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client.

You can deal with us anonymously where it is lawful and practicable to do so.

## **8. Marketing Practices**

Every now and then we might let you know, via mail, SMS, telephone or email, about news, products and services that you might be interested in. We will engage in marketing unless you tell us otherwise. At any time, you can contact us to update your marketing preferences.

## **9. Sensitive Information**

We may also need to collect sensitive information if we organise insurance covers for you. Sensitive information includes health information, racial information and genetic information.

We will only collect sensitive information that is reasonably necessary for us to perform our functions or activities in advising you, acting for you and dealing with you.

## **10. Privacy Complaints**

If you believe your privacy has been breached or you have a privacy complaint, you should write to us by email at [compliance@ethicalinvestment.com.au](mailto:compliance@ethicalinvestment.com.au) or to the Privacy Officer at PO Box 623 Paddington QLD 4064. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe.

If Ethical Investment Advisers Pty Ltd does not satisfactorily address your complaint you can escalate your complaint to the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## **11. Our Privacy Policy**

This information relates to our current Privacy Policy, which from time to time we may vary for any reason. We will publish any changes on our website. You may request a copy of our Privacy Policy if you require more information.