

Matrix Privacy Policy

Your privacy is important to us. This Privacy Policy outlines how Matrix Planning Solutions Limited and our Authorised Representatives (Matrix) manage the personal information we hold about you, our client. Privacy laws apply to how we collect, maintain, use and disclose your personal information.

It is Matrix's policy to respect the confidentiality of information and the privacy of individuals. Matrix is bound by the Privacy Act 1988 including the Australian Privacy Principles.

Matrix's Privacy Policy will be reviewed from time to time to take into account 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 the most current Matrix Privacy Policy.

Organisations To Which This Policy Applies

We are permitted by the Privacy Act to disclose personal information (other than sensitive information) to the following entities:

- Prospera Pty Ltd (ABN 86 106 749 231). Matrix Advisers may formulate financial planning strategies using the Prospera software.
- ClearView Group, including ClearView Life Assurance Limited (ABN 12 000 021 581), ClearView Life Nominees Pty Limited (ABN 37 003 682 175) and ClearView Financial Management Limited (ABN 99 067 544 549).

These companies are also bound by the Privacy Act in relation to the use and disclosure of your personal information.

Matrix's Privacy Policy is Based on Openness

We are committed to being open about how we use personal information. Your personal information will be collected and held by Authorised Representatives, staff and related bodies corporate of Matrix, an Australian Financial Services and Credit Licensee.

Why Does Matrix Collect Personal Information?

Our business is to understand and meet our client's needs over their lifetime for a wide range of financial and other services. To do this effectively, we need to collect certain personal information. We will only collect personal information as reasonably necessary for this purpose. In most cases, your personal information will be collected when you meet with your Adviser, or you provide your information to us via telephone or electronic and written material. In some instances, your information may also need to be collected from third parties such as your employer if you are a member of a corporate superannuation plan, accountant, mortgage broker or solicitor.

Our Advisers provide financial and loan products and services under the Matrix licence. They include (but are not limited to):

- Life insurance products protecting against risks
- Investment products to build wealth
- Superannuation and retirement income products to provide for retirement
- Banking and deposit products as part of the financial planning advice
- Financial planning advice, lending service advice and other services to help individuals understand their financial needs and make financial and investment decisions.

Collecting personal information also allows us to meet Australian or international legal or regulatory obligations that we, or product providers, might have.

What Kind of Personal Information Do We Hold?

Because of the nature of the products and services provided, government regulations and the impact of Australian or international legal or regulatory obligations and taxation laws on us, or on the providers of products and services to our clients, we ask for a range of personal information.

The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, employment details and any other information we consider necessary provided by you or by others nominated by you. We may also collect and retain information regarding your education, credit history, professional background and experience and may potentially include sensitive information. For more details, see the section 'Sensitive Information Is Subject To Greater Restrictions' on page 3.

In some instances, we may also collect information regarding your dependents and beneficiaries depending on the type of service and product we offer to you.

We obtain most of the information directly from you through applications or other forms, and from maintaining records of information provided in the course of financial planning advice, credit assistance, and customer service for the purpose of conducting business with you.

If you choose not to provide the necessary information, we may not be able to provide you with the requested product or service.

How Do We Collect Your Information?

We generally collect your personal information from you. However, we may collect the information with your consent from third parties where it is 'unreasonable or impracticable to collect from you' such as your accountant, a solicitor or your employer for superannuation purposes. We may also collect your information from publicly available sources or from third parties as required by law. If you are a minor (under 18 years of age) and you wish to obtain advice and services from Matrix, we may be required to obtain information from your legal guardian.

Where you have provided us with your contact details, personal information or requested our services via our websites, we may keep a record of your information.

How Do We Use This Information and Who May We Disclose It To?

Unless you are informed otherwise, the personal information we hold is used for the Primary Purpose namely, the provision of financial planning and credit assistance advice services as well as reviewing your ongoing needs. We may also use your personal information for secondary purposes such as: enhancing customer service and product options; communicating with you regarding the products and service you have with us; handling your complaints; and giving you ongoing educational information, newsletters or opportunities that we believe may be relevant to your financial needs and circumstances.

We also use the personal information we collect about our clients to fulfil our legal or regulatory obligations, or to assist providers of products and services to our clients to do so.

We will only disclose or release personal information to third parties for the Primary Purpose, or when permitted or required by law, or with your consent. You may provide your consent in writing, or via telephone.

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

- Other areas within the Matrix Group, who provide financial and other services.
- Financial planners, brokers and those who are authorised by Matrix to review the client's needs and circumstances from time to time.
- Service providers and specialist Advisers to Matrix who have been contracted to provide Matrix with administrative, financial, insurance, accounting, legal, information technology, research or other services.
- Other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law.
- Credit reporting or reference agencies or insurance investigators.

- Organisations in connection with the sale or proposed sale of all or part of the Matrix and/or your Adviser's business and to the use of that personal information by those organisations for those purposes.
- AUSTRAC, the government agency who oversees Anti-Money Laundering and Counter Terrorism. Before we arrange products or services, we are required to validate the client's identity. We will request and copy some personal documents for that purpose. We are also required to provide details of entities and certain transactions where we hold reasonable suspicion of reportable suspect matters.
- Product or service providers who have an obligation to disclose information to the Australian Tax Office (ATO) where the ATO has agreements to share information with overseas tax authorities.
- Relevant external dispute resolution bodies who would handle your complaint.

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

When Your Personal Information May Be Disclosed to Overseas Recipients

Generally, when carrying out our business activities and meeting our legal or regulatory obligations, we do not disclose your personal information to overseas recipients. An exception to this occurs when, to assist our Advisers to provide services to our clients, information is filed on customer relationship management tools which are typically located in the United States of America. We take reasonable steps to ensure that overseas recipients have secure processes in place to protect your information against unlawful access.

Marketing Opt Out

You can inform us if you do not wish to receive marketing materials from Matrix. You can instruct your Adviser or the Matrix office at the contact details provided on last page of this document.

Sensitive Information is Subject to Greater Restrictions

Some personal information we hold is 'sensitive'. Sensitive information typically relates to a person's racial or ethnic origin, membership of political associations or trade unions, religious affiliations, sexual orientation or practices, criminal record, health information, medical and genetic history.

Sensitive information is usually needed for applications for personal insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is Matrix's policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the client agrees otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this and we will only collect sensitive information from you where reasonably necessary for us to provide a service to you and with your consent, or in limited other circumstances specified under privacy laws.

Management of Personal Information

Matrix trains its employees, financial planners and their staff who handle personal information to respect the confidentiality of client information and the privacy of individuals. Matrix regards breaches of your privacy as very seriously and will impose appropriate penalties, including dismissal in some cases.

Matrix has appointed a Privacy Officer to ensure that Matrix's management of personal information is in accordance with this Privacy Policy 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 electronic and paper-based files and take steps to protect the personal information we hold from misuse, interference, 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.

You Have The Right To Check What Personal Information About You Is Held By Us

Under the Privacy Act, you have the right to access any personal information which Matrix holds about you and to advise Matrix of any inaccuracy. The Act does set out some exceptions to this.

To make a request, you will need to submit your request in writing, verifying your identity and specifying what information you require.

We will respond to 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.

Correction of Your Information

Matrix endeavours to ensure that your personal information is accurate and up-to-date. We realise that this information may change depending on your personal circumstances. You must notify us if there have been changes to your situation.

You may ask us to correct your information held by us which you believe is inaccurate or out of date. We will action your request in a timely manner.

What If You Have A Complaint?

If you consider that any action of Matrix breaches this Privacy Policy, the Australian Privacy Principles or otherwise fails to respect your privacy, you can make a complaint. Upon lodgement of a complaint with Matrix, you will receive an acknowledgement of receipt and an indication of the timeframe in which Matrix will respond to your complaint. We will try to resolve your complaint within 45 days. When this is not possible, we will inform you of the reasons for the delay.

To make a complaint, please forward it in writing to:

Complaints Manager
Matrix Planning Solutions Limited
GPO Box 4232
Sydney NSW 2001
Email: complaints@matrixplan.com.au
Phone: 1300 663 334

If you are not satisfied with our response to your complaint, you can access The Financial Ombudsman Service (FOS) which can deal with most privacy complaints involving financial services providers. FOS can be contacted at:

Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001
Email: info@fos.org.au
Phone: 1300 780 808

You may also apply to the Office of the Australian Information Commissioner (OAIC) to complain about the way we handle your personal information. OAIC can be contacted at:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Email: enquiries@oaic.gov.au
Phone: 1300 363 992