

Togethr Financial Planning Pty Ltd  
**Privacy Collection Statement**  
for MyLife MyAdvice

Effective 12 October 2020



Togethr Financial Planning Pty Ltd, trading as MyLife MyAdvice and Equip Financial Planning, is required to comply with the Privacy Act (Cth) 1988, the Australian Privacy Principles and Health Records Act (Vic) 2001 in relation to the privacy of your personal information. In this document Togethr Financial Planning Pty Ltd is referred to as "we", "our" and "us".

We are committed to complying with privacy law obligations and protecting and maintaining the privacy of your personal information. This Privacy Collection Statement sets out how and why we collect your personal information, the kinds of personal information we use and collect, how we keep it secure, how you can access and correct your personal information and how to make a complaint regarding your privacy.

## 1. How and why we collect personal information

In providing financial advice to clients, we collect and hold personal, and sometimes health, information about you. This information is held in both hard copy and electronic format.

Personal information about you is collected to:

- establish and verify you as a client
- establish your identity
- provide advice to you about investments and strategies
- prepare a financial plan for you
- assist in implementing investment recommendations for you
- manage and resolve complaints relating to you, and
- conduct research regarding our clients generally.

Personal information is collected directly from you when your client profile is created and when you meet or talk with us about your financial planning needs. We also obtain information about your super account balance, membership status, contribution history and related details from Togethr Trustees Pty Ltd, the trustee of MyLifeMyMoney Superannuation Fund and Equisuper. We will only collect sensitive information with your consent.

We may also collect information from other third parties, but only when you have provided your consent to this. Third parties may include authorised representatives or agents, or other financial product providers.

## 2. The kinds of personal information that we collect

Personal information is any information or opinion that identifies you or enables you to be reasonably identified. Personal information also includes sensitive information, which includes information about your health.

The kinds of information that we hold and collect includes:

- personal particulars (name, date of birth, gender, etc.)
- tax file number
- proof of identity (for example, certified copies of a valid driver's licence, birth certificate or passport)
- contact details (including addresses, email and phone numbers)
- details of assets and liabilities of all types
- Centrelink and other government agency information
- details of estate planning, including wills and nominated beneficiaries
- bank details

- superannuation membership and contribution history
- occupation and salary details
- family details (including dependants)
- level of insured death and disablement cover, and
- level of general insurance held.

## 3. Consequences if information is not provided

If you choose not to provide information we request, or if the information you provide is incomplete or inaccurate, it may:

- delay the provision of financial advice or services
- result in the provision of inappropriate financial advice or services
- result in you paying more tax than might otherwise apply
- prevent us from being able to contact you, and
- prevent us from assisting you to implement any financial plans.

## 4. Direct marketing

From time to time we may communicate with you about our services or changes that may impact your financial planning arrangements. We may also use your personal information to send you direct marketing communication that we think may be of interest to you.

At any time, you are able to opt out of these marketing communications by updating your details on our website or by unsubscribing via the link on the communication received.

## 5. Organisations to which information may be disclosed

We use your personal information for the purposes outlined above and this information may therefore be disclosed by us to third parties such as:

- insurers, medical consultants, professional advisers, financial institutions, lawyers, mailing houses, auditors and external service providers who are contracted by us for the purpose of providing the services
- dispute resolution bodies such as the Australian Financial Complaints Authority (AFCA) and the Office of the Australian Information Commissioner (OAIC)
- Togethr Trustees Pty Ltd, because it provides business services to Togethr Financial Planning
- international government agencies where expressly required by law, and
- government agencies such as Centrelink, the Australian Prudential Regulation Authority (APRA), the Australian Securities and Investments Commission (ASIC), Australian Taxation Office (ATO), Australian Transaction and Reports and Analysis Centre (AUSTRAC) and other bodies where authorised by law.

Whenever we disclose a client's personal information to a third party, we seek to ensure that your privacy is protected.

## 6. Overseas disclosure

We do not provide your personal information to, or collect personal information about you from, persons located overseas. In the event that this changes in the future, we will still only disclose and collect your information in accordance with Australian laws and standards, including the Australian Privacy Principles.

## 7. How we keep your information secure

We have security measures in place and take all reasonable steps to ensure that your information in both hard copy and electronic format is stored in a secure environment and protected from misuse, interference or loss and from unauthorised access, modification or disclosure. Our information technology systems use up-to-date security software and hardware and virus protection.

Your personal information is also protected through the use of secure passwords, usernames and security procedures.

Although in certain circumstances we are required to collect government identifiers 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.

As required under the Privacy Act, when we no longer need the information for any purpose and it is not required under Australian law to retain the information, it is destroyed in a secure manner or de-identified.

## 8. How you can access your personal information

You will, with limited exceptions, be able to access the personal, sensitive and health information that we hold about you by either making an appointment to come to our office to view it personally, or by calling to request a copy of the information. You will not be charged for accessing your personal information.

We will respond to requests for access within 30 days. Requests should be made to the Manager, Financial Planning (see contact details below). In certain circumstances, we may not be able to grant you access to the personal information that we hold about you if doing so would unreasonably impact the privacy of other individuals, or would undermine legal proceedings or negotiations currently in progress. If your request is refused, we will notify you with reasons for the refusal.

## 9. How you can correct your personal information

In order to provide financial planning services to you, we rely on your personal information being complete, up-to-date and accurate. If you believe that any of the personal information that we hold about you is incorrect, you may request that we amend the information. Requests can be made to the Manager, Financial Planning (see contact details below). We will take reasonable steps to ensure that the information is corrected.

## 10. How to make a complaint regarding your privacy

If you wish to make a complaint about a possible breach of your privacy, please contact the Manager, Financial Planning (see contact details below). The Manager, Financial Planning will work together with our Complaints Officer to ensure that the matter is resolved. Please provide sufficient details for your complaint to be investigated.

If your complaint is not resolved to your satisfaction within 30 days, you may be able to lodge a complaint with our external dispute resolution agency, the Australian Financial Complaints Authority (AFCA) or with the Office of the Australian Information Commissioner (OAIC).

## 11. Contact details

You can contact us in relation to any client rights as follows:

**The Manager  
MyLife MyAdvice**

**Post: Level 1, 535 Bourke Street  
Melbourne VIC 3000**

**Phone: 03 9648 4700**

## 12. Changes to this Privacy Collection Statement

We may amend this Privacy Collection Statement from time to time. Changes will be published on our website.

For specific enquires about privacy please contact:

**The Privacy Officer  
MyLife MyAdvice**

**Post: Level 1, 535 Bourke Street  
Melbourne VIC 3000**

**Phone: 03 9648 4700**