Bluewater
Financial Advisors Pty Ltd

PRIVACY POLICY

Bluewater Financial Advisors Pty Ltd (referred throughout this Privacy Policy as 'Bluewater', 'we', or 'us') respects the privacy of the people we deal with and we uphold high standards of privacy practice and security. Protecting your information is an important part of maintaining trust between us and our clients and by handling information in a secure manner we build strong business relationships.

We may amend or update our Privacy Policy as required by law or as our business processes or technology changes. We will post the updated policy on our website – http://bluewaterfinancial.com.au/files/privacy_statement.pdf. We encourage you to check our website from time to time to view our current policy or contact us for the printed copy.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and we manage and protect your personal information in accordance with the Australian Privacy Principles (APPs).

THE INFORMATION WE COLLECT

For most products and services, it is necessary for us to collect 'personal information' such as your name, identity details, contact details and transaction information. We may also need to collect other personal details (such as gender, marital status and financial information) and other information from which you can be identified.

HEALTH INFORMATION

We collect your health information where we offer you products with an insurance component or in assessing certain claims. We do not use or share that information for any purpose other than the underwriting or administration of your policy, claim or account, or otherwise notified to you at the time we collect your information.

SENSITIVE INFORMATION

Generally, we do not collect sensitive information about you unless required by law or where you consent for us to do so (and in any event only where it is relevant to your product). We will not collect sensitive information about you where this is expressly prohibited by law. Sensitive information includes information relating to:

- Race
- Political or religious beliefs
- Sexual orientation and sexual life
- Criminal convictions
- Membership of professional or trade associations or unions
- Biometric and health information
- Information about your affiliation with certain organisations, such as professional associations.

WHY WE COLLECT PERSONAL INFORMATION

We collect personal information about you which is reasonably necessary to:

- complete a financial product or credit product application form
- conduct marketing and social functions
- complete an identification form
- interact with an online interactive tool, such as a budget planner
- maintain your contact details
- fulfil our legal obligations, such as those relating to taxation and anti-money laundering and counter-terrorism financing or as otherwise authorised by you

Without such information, we may not be able to process your application or provide you with an appropriate level of service. In such circumstances, we will process your application and provide you with the most appropriate level of service that we can.

HOW WE COLLECT YOUR INFORMATION

We collect personal information about you directly from you — this can be in person, in documents you give us, from telephone calls, emails, your access to our website or from transactions you make. We take reasonable steps to be transparent about how and why we collect personal data.

We may also collect your personal information from joint account holder(s) or third parties including public sources, your adviser(s), employer (or its affiliates), agents, introducers, referrers, brokers, our related companies and service providers (including credit reporting bodies and information service providers).

HOW WE STORE INFORMATION

We keep personal information in physical and electronic records, at our premises and the premises of our service providers, which may include processing or storage in the cloud, which may mean in practice that this information is stored outside Australia. Where this occurs, we take steps to protect the security and integrity of personal information.

We also keep records of our interactions with you (including by telephone, email and online) and of your transaction history.

Our website contains several links to other websites, including the websites of our commercial partners. When this occurs, be sure the check the privacy policy of those websites, as we are not responsible for privacy practices of those other parties.

HOW WE USE YOUR INFORMATION

We use personal information about you for the purpose for which it was provided to us, including to:

- process applications
- administer and manage our products and services (including monitoring, auditing, and evaluating those products and services)
- develop scores, risk assessments and related analytical tools
- communicate with you and deal with or investigate any complaints or enquiries

While we may sometimes - where it is lawful and with your permission if necessary - share personal information with companies we do business with (e.g. in product development, joint venture arrangements or distribution arrangements), we do not sell personal information for marketing purposes to other organisations or allow such companies to do this.

WHEn WE SEND YOUR INFORMATION OVERSEAS

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might end up stored or accessed in overseas countries, including India, Philippines, United Kingdom and United States. When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place. Some financial advisers in the BLUEWATER group may enter their own outsourcing arrangements to countries other than those detailed above. Those arrangements will be disclosed separately by the financial adviser to their clients.

COOKIES

Some personal information may be collected automatically, without your knowledge, whilst navigating through and interacting with the content of our websites. The electronic methods of collection we use include cookies.

Cookies are a small text or pixel file stored on your device that records information about your visit to our websites. We use cookies to improve your website experience, to serve you with relevant information and to manage your access to certain parts of our websites. You can choose if and how a cookie will be accepted by changing your browser settings, but please be aware that his may affect your access to some parts of our websites.

WHEN YOUR INFORMATION IS DISCLOSED

Subject in all cases to local law, we may share personal information within Bluewater, and may disclose personal information outside Bluewater:

- as required by law or regulations, such as those relating to anti-money laundering and counter-terrorism financing or as required by a regulator;
- to our affiliates; and
- as contained in the terms and conditions of any specific product or service.

KEEPING YOUR INFORMATION ACCURATE AND UP TO DATE

We take reasonable steps to ensure that all information we hold is as accurate as possible. You can contact us at any time and ask for its correction if you feel the information, we have about you is inaccurate or incomplete.

HOW YOU CAN ACCESS AND CORRECT YOUR INFORMATION

You can contact us to request access to or correction of your personal information. In normal circumstances we will give you full access or make the requested corrections to your information. However, there may be some legal or administrative reasons to deny these requests. If your request is denied, we will provide you with the reason why (if we can). Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

KEEPING INFORMATION SECURE

We use security procedures and technology to protect the information we hold. Access to and use of personal information within Bluewater seeks to prevent misuse or unlawful disclosure of the information — this includes internal policies, auditing, training and monitoring of staff.

If other organisations provide support services, we require them to take appropriate technical and organisational measures to secure the privacy of the information provided to them.

WHAT IF I AM NOT HAPPY ABOUT THE HANDLING OF MY INFORMATION?

We are committed to providing members, and other parties whose personal information we hold, a fair and responsible system for the handling of their complaints.

If at any time you have any complaints in relation to privacy, please contact our Privacy Officer at one of the points referred to below. We will seek to address any concerns that you have through our complaints handling processes, but if you wish to take matters further you may refer your concerns to the Office of the Federal Privacy Commission.

CONTACT US ABOUT PRIVACY

If you seek any further information from Bluewater about this privacy policy, you should contact our Privacy Officer:

- Privacy Officer – Robert Stanoff
- compliance@bluewaterfinancial.com.au
- GPO Box 4523 Sydney NSW 2001
- **Telephone**: 1300 799 101
- **Facsimile**: 1300 799 212

ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Federal Privacy Commissioner at http://www.privacy.gov.au