

## Privacy Policy

### Commitment to Privacy

We value the trust you place in us when sharing your personal information and are committed to safeguarding it. We are bound by the **Privacy Act 1988 (Cth)** ("Privacy Act") and adhere to the **Australian Privacy Principles** ("APPs") and other applicable legislation, such as the **Spam Act 2007 (Cth)** ("Privacy Laws"). These laws regulate the collection, use, storage, and disclosure of personal information while ensuring its quality and security.

For further information on how we protect your privacy, please contact us.

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### About This Policy

This Privacy Policy outlines how we collect, use, disclose, and manage your personal and sensitive information.

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## Definitions

### Personal Information

Personal information refers to any information or opinion about an identified individual, or an individual who can reasonably be identified from that information.

### Sensitive Information

Sensitive information is a subset of personal information and includes details about your:

- Religious beliefs or affiliations
- Racial or ethnic origin
- Political opinions
- Criminal record
- Sexual orientation
- Health information
- Biometric data

Any reference to "personal information" in this policy also includes sensitive information. The collection of sensitive information is restricted under the Privacy Act and generally requires your explicit consent unless otherwise permitted by law. For example:

- We may collect health information to process an insurance claim.

- We may collect biometric information (e.g., voice recognition data) to verify your identity.

Sensitive information may also be collected to address hardship or provide additional care to clients in vulnerable circumstances.

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## Types of Personal Information Collected

To provide tailored advice and services, we may collect and hold the following types of personal information:

- **Identification Details:** Your name, address, contact details, date of birth, gender, and tax residency.
- **Family and Relationships:** Information about family members or related entities.
- **Employment and Education:** Occupation, employer, payroll details, tax records, employment history, and educational qualifications.
- **Corporate or Trustee Relationships:** Information about your involvement as a shareholder, beneficiary, settlor, or controlling person in entities.
- **Financial Preferences and Goals:** Preferences and values related to financial products or strategies.
- **Government Identifiers:** Tax file number, Centrelink identifier, director identification number, and identification document details (including photographs).
- **Financial Circumstances:** Details of your assets, liabilities, income, expenses, bank details, goals, strategies, risk tolerance, insurance, and estate planning arrangements.
- **Signatures:** Copies of your signature in physical or digital form.
- **Third-Party Representatives:** Identification details of any authorized representatives or individuals with power of attorney.

The specific information collected will depend on the products or services you request.

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## Collection Methods

We collect personal information through various channels, including:

- Telephone communications (landline or mobile).
  - Electronic formats, such as email and online platforms.
  - Digital interactions, including through our website and social media platforms.
  - Physical documentation provided to us.
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Records of your interactions, acknowledgments, signatures (including digital), and cookies may also be retained in accordance with this policy.

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## **Ongoing Collection**

Throughout your relationship with us, we may collect additional information, including:

- Transaction details related to your products or services.
  - Records of your inquiries or complaints.
  - Additional details required to process insurance claims or respond to your specific requests.
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This policy is designed to ensure that your personal information is handled in a transparent, lawful, and secure manner. Should you have any questions or require further clarification, please contact us directly.

## **Tax File Numbers (TFNs) – Financial Planning**

### **Collection and Use of Tax File Numbers**

Under taxation laws, the collection, use, and disclosure of Tax File Numbers (TFNs) is generally restricted. However, investment bodies may receive a TFN from a person acting on behalf of another.

CWP Solutions may collect your TFN to administer and implement financial planning recommendations. Once the TFN has been used for its intended purpose, it will be securely removed or redacted from our records. Alternatively, you may choose to provide your TFN directly to the relevant body.

### **Why Investment and Superannuation Bodies Request TFNs**

Investment and superannuation bodies typically request TFNs to:

- Ensure accurate taxation of investment income.
  - Avoid excess taxation of concessional super contributions.
  - Process personal after-tax contributions to your superannuation account.
  - Assist in locating and consolidating superannuation accounts.
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## No Obligation to Provide a TFN

Providing a TFN is not mandatory, and there is no penalty for choosing not to do so. However, failing to provide a TFN or exemption status may result in:

- Taxation of investment income and concessional super contributions at the highest marginal rate plus the Medicare levy.
- Higher tax on superannuation benefits (potentially refundable via your income tax assessment).
- Rejection of personal after-tax super contributions by your superannuation fund.
- Difficulty in locating and consolidating superannuation accounts.

## TFN Exemptions

Certain individuals are exempt from providing a TFN, including:

- Recipients of qualifying pensions or benefits.
- Individuals under the age of 16.
- Entities are not required to lodge income tax returns.
- Non-residents of Australia.

If you qualify for a TFN exemption, you must disclose your exemption status to the relevant investment body.

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## Providing Full Personal Information

While you have the right to remain anonymous or withhold certain personal information, CWP Solutions specializes in offering tailored advice based on your specific circumstances, objectives, and needs.

If we do not receive accurate or complete information, we may be unable to:

- Provide appropriate advice or services.
- Ensure that our recommendations are in your best interests.

Where limited information is provided, we will notify you of any identified limitations or risks associated with our advice.

## Purpose of Collecting Personal Information

We collect, use, hold, and disclose personal information to:

- Assess your eligibility for financial products or services.
- Assist with online applications and administer the product or service.
- Improve our services through client surveys and feedback mechanisms.
- Respond to inquiries, feedback, or complaints.
- Mitigate fraud and security risks, including the use of two-factor authentication.
- Comply with legislative or regulatory obligations.

We may also use your information to prevent fraud, crime, or harm, and for internal business improvements.

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## Methods of Collection

We collect personal information:

- **Directly from You:** When you apply for a product or service or communicate with us in person, over the phone, or electronically (e.g., via email or our website).
  - **From Third Parties:** Such as public registers, representatives (e.g., legal advisors or accountants), employers, insurers, or financial institutions.
  - **Electronically:** Via website interactions, cookies, and digital platforms.
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## Legal Obligations for Collection and Disclosure

We are required or authorised to collect and disclose certain personal information under various laws, including:

- **Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)** and associated rules.
- **Income Tax Assessment Act 1936 (Cth)**, which governs the collection of TFNs.

For further details regarding our privacy practices or legal obligations, please contact us.

## Privacy and Data Protection Policy

## How We Protect Your Personal Information

CWP Solutions implements robust measures to secure your personal information, including:

- Secured IT systems and data backups across all computers, programs, and mobile devices.
- Controlled access to physical premises and secured paper files.
- Employee training and confidentiality clauses in employee and contractor agreements.
- Processes to destroy or de-identify personal information when no longer required or inadvertently provided by third parties.

Despite these precautions, the transmission and storage of data over the internet or within cloud-based systems may not be completely secure. While we take reasonable steps to protect your personal information, unauthorized access, interception, or breaches by third parties beyond our control may occur.

### Recommendations for Your Security:

We advise securing internet-accessible devices and storage, such as mobile phones, and promptly updating passwords if you suspect your account's security is compromised. Should you have concerns about the security of your interactions with us, please contact us immediately.

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## Notifiable Data Breaches (NDB)

Under the **Privacy Act 1988 (Cth)**, the Notifiable Data Breaches (NDB) scheme requires us to notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in the event of a breach likely to result in serious harm.

### Our Response to a Data Breach:

- Notification will be provided as soon as practicable, detailing the breach and recommended actions (e.g., password updates).
  - We will remain in close contact to address your concerns, inform you of corrective actions, and advise on steps to minimize the impact on your privacy.
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## Disclosure of Personal Information

We may disclose your personal information to external organizations in accordance with the **Privacy Act 1988 (Cth)**. To ensure protection, we require third parties to comply with privacy laws and limit their use of your personal information to specific purposes we authorize.

### Categories of Recipients:

- **Service Providers:** Agents, contractors, technology providers, and administrative or paraplanning services.
- **Financial Institutions:** Banks, lenders, superannuation funds, stockbrokers, and fund managers.
- **Advisors and Representatives:** Legal advisors, compliance auditors, accountants, mortgage brokers, property valuers, and trustees.
- **Insurers and Healthcare Providers:** For relevant claims and services.
- **Regulatory and Legal Bodies:** Dispute resolution schemes, courts, tribunals, law enforcement, and government agencies.
- **Other Authorized Third Parties:** Organizations providing joint services or products, subject to privacy policies outlined by those third parties.

### Specific Circumstances:

- If you consent, explicitly or impliedly, to a disclosure.
- In the event of a sale, merger, or restructure involving our business or assets, where personal information may be part of the transferred assets.
- As otherwise permitted or required by the **Privacy Act** or applicable laws.

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## Use of Cloud-Based Services and Overseas Disclosure

We may store your personal information in cloud or networked systems, accessible globally via an internet connection. As a result, it may not always be possible to identify the exact location where your data is held.

### Overseas Disclosure:

- Some third-party service providers and associated entities we engage may store or access data overseas.
- Our associated entity, Complete Philippine Solutions, based in the Philippines, assists with administrative and paraplanning services. This team operates under our direct supervision and training, with access to specified systems.

**Outsourcing Policy:**

CWP Solutions adheres to an **Outsourcing Policy** to ensure third-party service providers meet stringent privacy and data protection standards. We select providers whose privacy policies align with our commitment to safeguarding your personal information.

**Key Service Providers and Applications:**

A list of primary third-party service providers, their data center locations, and privacy policies is available upon request.

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This policy ensures transparency in how your personal information is handled, stored, and disclosed. Should you require further details or wish to access our list of third-party providers, please contact us.

**Privacy Policy****Service Providers and Data Protection**

We use several third-party providers for customer relationship management, portfolio reporting, financial planning, and cloud file storage. Below are the providers, along with links to their privacy and data protection policies:

- **IRESS (Financial Planning)**
  - [Privacy Policy](#)
  - [Data Protection Policy](#)
- **Microsoft (Cloud File Storage and Business Applications)**
  - [Privacy Statement](#)
  - [Data Centre Locations](#)
- **DocuSign (Electronic Signature and Document Storage Application)**
  - [Privacy Policy](#)
  - [Data Residency Information](#)
- **Adviser Logic and Morningstar (Portfolio Research Tool)**
  - [Privacy Policy](#)
- **Xero**
  - [Privacy Policy](#)
- **Google Cloud Storage**
  - [Privacy Policy](#)

All providers have informed us that their systems employ data encryption at rest.



### **Overseas Disclosure**

Some overseas organizations may be required to disclose information shared with them under foreign laws.

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### **Use of Personal Information for Marketing**

We may use your personal information to offer you products and services that may interest you. This includes direct marketing communications such as offers, updates, events, articles, and newsletters. You may opt out of receiving such communications at any time by notifying us or using the unsubscribe feature.

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### **Collection of Personal Information Electronically**

We collect personal information electronically via internet browsing, mobile or tablet applications, and client portals. This may include:

- Date and time of visits.
- Pages viewed and navigation patterns.
- User interactions.
- Location information.
- Device information, including IP addresses.

### **Cookies**

Our website uses cookies to enhance security and improve your experience. Cookies:

- Cannot read your hard drive or obtain information from your browser.
- Cannot be sent or retrieved by other websites.
- Can be disabled through your browser settings.

We will not request personal information through social media platforms. Any invitations to share information via private messaging or secure channels will be made explicitly.

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## Access and Correction of Personal Information

You may request access to or correction of your personal information by contacting us.

- No fee is charged for corrections.
  - A reasonable fee may apply for access requests to cover administrative costs.
  - If access or correction is denied, we will provide reasons and information on how to complain.
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## Retention of Personal Information

We retain personal information for at least seven years as required by law to demonstrate compliance with financial service laws and address inquiries or complaints. Periodic reviews are conducted to delete information no longer required.

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## GDPR Compliance

If you are a resident or a business established in the European Economic Area (EEA), you may be entitled to additional rights under the **General Data Protection Regulation (GDPR)**, including:

- Erasure of personal information.
- Access to personal information in an electronic and portable format.
- Restrictions or objections to processing your information.
- Withdrawal of consent.

For further details on GDPR rights, please contact us.

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## Resolving Privacy Concerns and Complaints

If you have concerns or complaints about how your personal information is handled, contact us directly. Complaints will be addressed promptly, aiming for resolution within 30 days per our complaints policy available at [www.cwpsolutions.com.au](http://www.cwpsolutions.com.au).

## External Complaints

If you are dissatisfied with our response, you may contact:

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## Office of the Australian Information Commissioner (OAIC)

- **Address:** GPO Box 5218, Sydney NSW 2001
- **Phone:** 1300 363 992
- **Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)
- **Website:** [www.oaic.gov.au](http://www.oaic.gov.au)

## Australian Financial Complaints Authority (AFCA)

For financial service disputes, contact AFCA at [www.afca.org.au](http://www.afca.org.au).

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This document forms part of our commitment to transparency and accountability in handling your personal information.

## Contact Us

For privacy-related inquiries or concerns, you may contact our Privacy Officer by writing to:

### Attention:

Tuan Hoang and Steven Kwok  
Office 2, 420 Spencer Street  
West Melbourne VIC 3003

Alternatively, you may contact us by phone or visit our office in person:

- **Phone:** +61 3 8609 8880
  - **In-person:** Office 2, 420 Spencer Street, West Melbourne VIC 3003
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## Links to Other Sites

Our website may include links to third-party websites. These websites are not governed by this Privacy Policy or our privacy practices. We recommend reviewing the privacy policies of any third-party websites directly to understand their privacy practices.

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## Changes to Our Privacy Policy

We may revise this Privacy Policy from time to time to reflect changes in our handling of personal information. Updated versions will be published on our website, and we encourage periodic review of this policy to remain informed.

While we aim to ensure the currency of third-party links included in this policy, such links may change before our policy updates. We recommend verifying the accuracy and recency of any third-party privacy policies linked herein.

**Last Amended:** November 2024

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## Providing Us with Information About Others

If you provide us with the personal information of another individual, you must:

- Inform them about this Privacy Policy.
- Ensure you have obtained their consent to disclose their personal information to us.

For children under the age of 16, by providing their personal information, you confirm that you are their parent or guardian and have given consent for us to hold this information. If another parent or guardian also holds responsibility, please seek their consent and inform them of this Privacy Policy.

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## Client Consent

By engaging us for your financial needs, you consent to the collection, use, and disclosure of your personal information as outlined in this Privacy Policy.

We will seek your explicit consent in our engagement statement for the following:

1. Using and disclosing sensitive information as detailed in this Privacy Policy.
  2. Disclosing your personal information to overseas recipients in connection with services provided to you.
  3. Using your personal information for secondary services, such as integrating information into third-party applications or services.
  4. Sharing your personal information with third parties when it is not strictly necessary for our services but enhances service efficiency.
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5. Collecting, using, or disclosing information about children under the age of 16, with parental or guardian consent.
6. Obtaining your Tax File Number, should you choose to provide it.

If you disagree with any terms of this Privacy Policy, please refrain from using our website or providing us with personal or sensitive information.

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## Definitions

We, us, or our refers to:

- **CWP Solutions Pty Ltd** trading as CWP Solutions
  - Corporate Authorised Representative: CAR 376428
  - ABN: 92 652 222 261
- **Wealth Service Partners Pty Ltd**
  - AFSL: 535126
  - ABN: 58 158 828 525
- **Complete Accountancy Solutions Pty Ltd**
  - ABN: 15 600 546 361
- **Complete Support Services Inc**
  - TIN:740 320 326 000

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