MoonCunningham Financial Services Pty Ltd

A.B.N.: 38 674 114 731

A.F.S.L.: 555 843

Privacy Policy

1 Overview

The collection of personal information about individuals by organisations is governed by the Privacy Act 1988 (the Privacy Act) which contains a national scheme for the collection, use, correction, disclosure and transfer of personal information by organisations in the private sector.

Protecting our clients' privacy is very important to us. As part of our commitment to ensuring the safety of our clients' private and confidential information and as a mechanism to ensure our compliance with the Privacy Act, we have established and implemented a Privacy Policy (the Policy).

Purpose

The Policy explains our policies and practices with respect to the collection and management of personal information we collect from you.

The Privacy Act requires us to handle your personal information in accordance with a set of principles, known as the Australian Privacy Principles (APPs). Those Principles and our approach to those Principles are set out below.

Scope

The Policy applies to MoonCunningham Financial Services Pty Ltd and all of its related companies together referred to in this Policy as us.

2 Collection

What information do we collect?

We will collect and hold your personal information for the purposes of:

- Providing Financial Advisory services to you
- Providing recommendations in relation to Investment Products
- Investment in, managing and administering investment products and services on your behalf
- Letting you know about our other products and services.

The type of information collected from you includes information that is necessary to operate your investment accounts or for us to provide advice to you. We may ask you to provide personal information such as your:

- name
- e-mail address
- residential and/or postal address
- date of birth

- contact details
- occupation
- bank account details
- financial details
- employer
- tax file number (TFN).

Much of this information is collected through application forms, the use of our online facilities or through ongoing communications with you.

We will not collect any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us.

There are also specific circumstances in which we will ask for your sensitive information such as:

- personal health information from you when applying for insurance
- personal health information from medical practitioners when you are making a claim
- income information from employers in instances where you are applying for additional insurance protection or salary continuance insurance
- details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993*, for the purposes of paying benefits in the event of your death.

We will always seek your consent before collecting this kind of sensitive information.

We may also need to collect information from third parties. For example, we may need to collect information from your accountant, product issuer and employer.

We are also required to ask for certain information by law. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information. For example, in addition to obtaining personal information from you, whenever you acquire a new product or service from us, we will need to obtain certain documentary evidence from you as to your identity. Such evidence may include items such as a certified copy of your driver's licence, passport or birth certificate.

What if you don't give us the information we request?

You are not required to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or limit the quality of advice we provide to you
- prevent or delay the processing of an application or any claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact on the taxation treatment of your account.

For example, we are required to ask for your TFN when you invest in a superannuation product. If you choose not to give us your TFN, you may be subject to higher tax charges on your superannuation and the fund may not be able to accept personal contributions.

3 Use of information

How do we use the information that we collect from you?

We use your personal information for the purposes for which it has been obtained. We collect your personal information so that we are able to act on your request, such as:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits
- report the investment performance of your account
- keep you up to date on other suitable services offered by us

Personal information will also be used where you have consented to such disclosure or where it is required or authorised under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

We may use cloud-based software, artificial intelligence (AI), data analytics and automated systems to assist with providing financial advice, investment analysis, portfolio management, administration, record keeping and other related business activities. These technologies may process personal information where reasonably necessary to provide our services, subject to applicable privacy laws and appropriate safeguards.

4 Disclosure

Who do we give information to?

We may provide your information to external parties. Where personal information is disclosed there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we often disclose your personal information include:

- any organisations involved in providing, managing or administering investment products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers or mail houses
- your employer (relates only to employer sponsored superannuation arrangements)
- any fund (administrator or trustee) to which your benefit is to be transferred or rolled over
- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or any other person who may be entitled to receive your death benefit, or any person contacted to assist us to process that benefit
- any financial institution who holds an account for you
- any professional advisers appointed by MoonCunningham Financial Services Pty Ltd.
- third-party technology providers, including cloud storage, software, data processing and artificial intelligence service providers, where reasonably necessary to deliver, administer or support our services.
- businesses that may have referred you to us (for example your lawyer).

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force). We will also disclose your information if you give your consent.

Will my information be disclosed overseas?

We may use service providers located in Australia or overseas, including providers of cloud storage, software, artificial intelligence and data processing services. As a result, your personal information may be stored, processed or disclosed overseas.

Where personal information is disclosed to overseas recipients, we will take reasonable steps to ensure that it is handled in accordance with the Australian Privacy Principles, unless an applicable exception applies.

Our overseas service providers may be located in countries including the United States. Other countries may be involved depending on the service providers and technologies we use. We will identify additional countries where practicable.

5 Access and correction of information

Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If you wish to access your personal information, you should contact us through our offices.

6 Complaints

If you believe that we have mishandled your personal information, in turn, breaching the APPs, you may lodge a complaint with us. The complaint, addressed to the Privacy Officer, must be in writing in accordance with the Privacy Act 1988. Refer to section 9 for contact details for our Privacy Officer.

From receipt of your written complaint, the Privacy Officer has 30 days to respond.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner. You can lodge a written complaint with the Information Commissioner by:

Submitting an online form through the Information Commissioner's website: www.oaic.gov.au

- fax to 02 9284 9666
- email at enquiries@oaic.gov.au

7 Protection of the personal and sensitive information that we hold

How do we protect the security of your information?

We have practices and procedures in place to safeguard your privacy. Your personal information is stored using secure information systems, including cloud-based services, with appropriate access controls and security measures. The people who handle your personal information for us have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

Where we use third-party cloud services, artificial intelligence or automated systems, we take reasonable steps to protect personal information through appropriate security measures, access controls and service-provider arrangements. AI-assisted analysis and recommendations remain subject to appropriate human oversight.

Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use online services. If you do not wish to transmit information via email or through our website, there are other ways in which you can provide this information to us. You can, for example, call us or send us information by post.

Cookies

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

8 General

How long do we retain your personal information?

We are required by law to retain certain records of information for varying lengths of time. Depending on the context surrounding the information, we may be required to retain records which include your personal information from 7 years to permanently. Where your information is not required to be retained under law, we will take reasonable steps to permanently destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

9 How do I contact the Privacy Officer?

You can contact us by email at wealthmanagement@mooncunningham.com or as detailed below:

Privacy Officer: **Colin Goldsmith**
Name: **MoonCunningham Financial Services Pty Ltd**
Address: **6-10 Tooronga Terrace, Beverly Hills, NSW, 2209.**
Phone: **(02) 9503 1100.**