

Privacy Policy

Symmetry Group Pty Ltd
AFSL 426385

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Privacy Policy

1. Background

Symmetry Group Pty Ltd (“Symmetry”) regards Privacy as a pertinent issue and understands that it is important for you to know how we handle your personal information.

Privacy Laws apply to how we collect, hold, use and disclose your personal information. Symmetry complies with its obligations under the *Privacy Act 1988* (Cth) and the associated Australian Privacy Principles (“APPs”) and is committed to protecting the privacy of your personal information.

You can obtain further details of our obligations as an organisation under Australia’s privacy laws from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner’s associated guidelines at www.oaic.gov.au.

The following Privacy Policy has been published to provide you with an outline of the following:

- What information we collect about you;
- How we collect personal information;
- What we do with your personal information;
- Who we disclose personal information to;
- How we protect your personal information;
- How to keep your personal information accurate and up to date;
- How you can access your personal information; and
- Who to contact if you have any questions about this Policy or wish to make a complaint.

2. Changes to our Privacy Policy

If at any time our Privacy Policy changes, the updated details will be available on our website (<http://www.symmetrygroup.com.au/>). Any information we hold about you will be governed by the most current version of the privacy policy. Your continued use of our site, products and services indicates your acceptance of any changes.

3. Types of personal information that we collect, use and hold

We may collect and hold a range of personal information about you to provide you with our services, including:

- identification information including your full name, residential address, and date of birth;
- gender;
- marital status;
- occupation;
- driver’s licence and/or passport details;
- contact details (including telephone and email addresses);
- information about your financial position including details of assets, liabilities, income and expenses; and
- any other information we may need to provide you with our services.

We may collect sensitive information from you. Sensitive information (for example) may include information relating to a person's health. We will only collect sensitive information that is reasonably necessary for us to provide you with our services.

4. Why we collect your personal information

We may use and disclose the information we collect about you for the following purposes:
establishing your identity;

- a) checking whether you are eligible for our services;
- b) providing you with our services;
- c) managing and administering our services;
- d) responding or dealing with a complaint;
- e) providing information we believe may be relevant or of interest to you;
- f) direct marketing;
- g) data analytics and statistical analysis;
- h) to notify you of other products, services, special offers or events;
- i) where you otherwise expressly consent to the use or disclosure;
- j) complying with legislative and regulatory requirements in any jurisdiction; and
- k) to assist Symmetry in the running of its business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Some laws require or authorise our collection of your personal information including the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth).

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

We will retain the information we collect from you for a period of at least 7 years, as required by law.

5. How we collect your personal information

We generally collect personal information directly from you. For example, personal information will be collected through our fact finding processes, forms and other interactions with you in the course of providing you with our services.

We may also collect your information from your representatives or professional advisers.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services, or meet your needs appropriately.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information that is not relevant, we will destroy or de-identify that personal information as soon as practicable.

6. Disclosure of your personal information

In order to provide you with services, we may need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- a) to any of Symmetry's related entities;
- b) our agents, contractors and external service providers;
- c) to our professional advisers, auditors and insurers;
- d) your representatives;
- e) the Australian Financial Complaints Authority or Office of the Australian Information Commissioner;
- f) organisations involved in a transfer or sale of our assets or business;
- g) anyone to whom the disclosure is required or permitted under the Privacy Act, other Australian Law, Regulation or Court/Tribunal Order; and
- h) anyone else where you have provided your consent.

We may disclose your personal information to overseas entities that we deal with in the course of our business. These recipients may be located in the following countries:

- India
- Philippines
- United States of America
- South Africa

We will not disclose personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act and the APPs; or
- the recipient is subject to an information privacy scheme similar to the Privacy Act or
- you have consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

7. Direct Marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and

- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

8. Request(s) for access to personal information

You can gain access to your personal information (subject to some exceptions allowed by law) by contacting the Privacy Officer. We will need to verify your identity first. We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances, it may take longer (for example, if we need to contact other entities to properly investigate your request).

We may refuse to provide you with access in certain circumstances. If access is refused, we will give you a notice explaining the reasons for our decision and your options to make a complaint.

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

9. Website

Symmetry's compliance with the Australian Privacy principles also applies to your access to our website.

We collect personal information when we receive completed online generated forms from our website <http://www.symmetrygroup.com.au/>. We may also use third parties to analyse traffic at that website, which may involve the use of cookies.

You can use your web browser settings to accept, refuse and delete cookies. To do this follow the instructions provided by your browser. Please note, that if you set your browser to refuse cookies, you may not be able to use all of the features of our website such as our 'enquiry form'.

We also use analytics on the site. We do not pass any personally identifiable information through this function, however, the data we collect may be combined with other information which may be identifiable to you.

Some areas of our website may enable you to be a client of Symmetry and you will be issued with a username and password which are strictly for your personal use only.

Symmetry will not be liable for any acts that arise from the use of your username and password whether authorised by you or not or are a result of your failure to maintain strict security protocols over the use of your login details. Please notify Symmetry immediately if you become aware of a breach of your security.

If you have objections to the Privacy Policy, you should not access or use the Site.

10. Storage and Security

We recognise the importance of securing the personal information of our customers.

Symmetry will primarily hold information about you electronically on secure servers located in Australia. Where information is held electronically, Symmetry utilises technological safeguards including passwords and multifactor authentication.

11. Email Communication

As electronic communication becomes more and more part of our daily business lives, Symmetry will use your email address that you have provided to contact you when necessary or to provide you with information you have requested.

We may also use your email address to alert you to marketing initiatives, newsletters, or events that may interest you.

If at any time you decide you do not wish to receive such marketing information you have the right to ask us not to send you any further material. You may do this by advising us by phone or by sending us an email with "Unsubscribe" in the subject line. Please allow two weeks for the instruction to take effect.

12. What if some information Symmetry holds is wrong?

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

13. How do I make further enquiries about a breach of privacy?

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us and direct your complaint to the Compliance Manager. We will respond to your complaint within 30 days.

Compliance Manager:

Address: PO Box 8104, Subiaco East WA 6008

Telephone: (08) 6380 1400

Email: Lauren@symmetrygroup.com.au

Website: <http://www.symmetrygroup.com.au/>

We will use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Office of the Australian Information Commissioner

1300 363 992, online at

www.oaic.gov.au and in writing to:

Director of Complaints, Office of the Australian Information Commissioner,

GPO Box 5218 Sydney NSW 2001

You may also contact the Australian Financial Complaints Authority (AFCA):

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678

Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001