

EPG Wealth

ESTABLISH • PROTECT • GROW

Privacy Policy



Privacy Policy – All Entities

Key Information

Prepared by:	Cowell Clarke
Current version:	V1
Last reviewed:	November 2020
Next review date:	November 2021
Person responsible for review:	Compliance Officer

Document History

Version	Summary of Amendments	Author	Date	Pages
1	New document	Cowell Clarke	November 2020	7

<p>1. Requirement</p> <p>Statutory.</p> <p>2. Purpose</p> <p>To ensure that APP entities comply with their privacy obligations. This policy can be used for credit providers, reporting entities under the AML/CTF Act and APP entities.</p> <p>The OAIC recommends that privacy policies be as specific as possible, e.g. listing third parties the entity interacts with and using definitive language such as “we collect” rather than “we may collect”.</p> <p>At clause 3.2, there is the necessary distinction between using and disclosing information overseas, this distinction should be brought to the attention of clients when drafting the policy. The distinction is set out by the OAIC as follows:</p> <ul style="list-style-type: none"> ○ ‘Use’ — generally, an organisation or agency uses personal information when it handles and manages that information within the organisation or agency’s effective control. ○ ‘Disclosure’ — an organisation or agency discloses personal information when it makes it accessible or visible to others outside the organisation or agency and releases the subsequent handling of the personal information from its effective control. <p>Generally where the company only allows an overseas entity to use the information and there is an agreement in place setting this out e.g. a cloud storage provider – this does not require disclosure under the APP’s.</p> <p>3. Relevant guidance</p> <p><i>Privacy Act 1988 (Cth)</i></p>

Privacy Policy ("Policy")

This Policy was last updated on 4 November 2021.

EPG Wealth Pty Ltd 645 104 525 ('we', 'our', 'us') is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

By voluntarily supplying us with your personal or credit information, you are agreeing to be bound by this Policy. While we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer in the first instance:

Privacy Officer Contact: Lachlan Carmody
Email: lachlan.carmody@epgwealth.com.au

Postal address
Attention: Privacy Officer
EPG Wealth
PO Box R412 ROYAL EXCHANGE NSW 1225

Our website contains links to other websites. When a user clicks on a link to another site, they are no longer subject to this Policy.

1. What types of information do we collect and why?

In the course of providing our goods and services to you, we collect personal and other information about our clients and how they interact with us, our goods, and our services. We collect personal information through a number of mechanisms, including:

1.1 **Collection from you:** we collect and store information you provide directly to us (*either in person, by email, by phone, or by any other direct means*) in order to deliver our goods and services. This includes:

- Contact information: such as your name, address, email address, telephone number;
- Personal information: such as date of birth and driver's licence details;
- Financial and credit information: such as your payment information (credit card, bank account, etc);
- Business details: such as your Australian Business Number; and/or

1.2 **Automatic:** we use cookies (*small text files stored on your devices that provide us with information such as your internet protocol (IP) address, server information, internet service provider, and information on how you interact with our website*) or similar technologies to collect data.

This information is not linked to you personally.

If you opt-out of third party tracking technologies or elect to prevent the use of cookies, this may result in the loss of Website functionality, restrict your use of the Website or delay or affect the way in which the Website operates.

- 1.3 **Device:** if you use our services or interact with us through a mobile device, we receive technical information about your device, numbers that identify the device and your location information. This information is not associated with you.
- 1.4 **Communications:** when you communicate with us, we collect information such as your contact details (such as email address or phone number). You can elect to not receive communications from us by contacting our Privacy Officer.
- 1.5 **Digital platforms:** if you access our goods or services by connecting a social media login (such as Facebook or Google) we collect information derived, associated or connected with that platform where permitted by the platform's terms of service. Any information we collect from social media, or other online platforms, is collected in accordance with that platform's terms and conditions.
- 1.6 **Through other sources:** where necessary, we also collect your information from publicly available records. This can include information relating to an individual's credit worthiness and other information from credit providers, subject to legal restrictions. Where appropriate and necessary to do so we collect information from public records such as those maintained by the Australian Securities and Investments Commission, Australian Financial Security Authority (such as the Personal Property Securities Register), and land titles offices in each state. We may do this where it is unreasonable or impractical to collect this information from you.

If you have previously applied for a position with us we may have received your personal information from third parties such as recruiters or external websites. We use the information we receive to contact you about any potential opportunities or to evaluate your candidacy.

2. **How we use your information?**

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related to that primary purpose if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of providing appropriate financial advice.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

2.1 **Disclosure of personal information to third parties**

We may disclose your information to third parties who assist us in providing, managing and administering our goods and services. We will also disclose your personal information where such disclosure is required by law.

We disclose your personal information to third parties that:

- Manage and enhance our customer database including [specify entity];
- Process information including [specify entity];
- Assess your interest in our products or services including [specify entity];
- Conduct customer research or satisfaction surveys including [specify entity];
- Send marketing information to you on our behalf including [specify entity];
- Other organisations listed as trade references in a credit application including [specify entity]; and

- Other purposes related to the above.

We do not sell or license your information to third parties.

2.2 **Disclosure of credit information to third parties**

We do not disclose your credit information to any credit reporting bodies.

3. **How do we store and secure the information we collect?**

We store your personal and credit information as on our electronic data base system and on computers with appropriate back up and security systems.

3.1 **Security and management of personal information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised access, modification or disclosure. We do this by:

- putting in place physical, electronic and procedural safeguards in line with industry standards;
- requiring any third party providers to have acceptable security measures to keep personal information secure;
- limiting access to the information we collect about you;
- imposing confidentiality obligations on our employees; and
- only providing access to personal information once proper identification has been given.

While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you in accordance with our obligations under the Privacy Act.

If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

3.2 **Sending information overseas**

We do not disclose personal information overseas.

4. **How to access and control your information?**

4.1 **Accessing the information we hold about you**

Under the APPs you may be able to obtain a copy of the personal information that we hold about you. To make a request to access this information please contact us in writing. We will require you to verify your identify and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

We may charge a fee to cover the costs of verifying your application, and retrieving, reviewing and copying any material requested.

4.2 **Updating your personal information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact our Privacy Officer if you believe that the information we hold about you requires correction or is out of date. We

endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to credit information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

5. **Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Office with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance Office of the Australian
Information Commissioner
GPO Box 5218
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#)