

Privacy Policy



When you trust us with your personal information, you expect us to protect it and keep it safe.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

Who we are

References in this policy to 'we', 'us' and/or 'our' should be read as either Halpin Wealth Partners, its Representatives, or your 'Authorised Representatives' of Halpin Wealth Partners, as the context requires.

Halpin Wealth Partners Pty Ltd (Halpin Wealth)
ABN 72 633 241 068
AFSL Number: 517210

For further information about who we are, and the services we provide, please refer to our Financial Services Guide (FSG) available on our website: www.halpinwealth.com.au

About this policy

This privacy policy provides you with information about:

- the personal information that we collect about you;
- how we handle your information, including how we use, disclose and keep it secure, and;
- how you can access your personal information or make a complaint about our handling of your information.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

What information do we collect, and why?

We only collect personal information that is required for us to provide financial services to you and to satisfy our own legal obligations as the holder of an Australian Financial Services Licence.

We do not utilise any standard personal identification reference numbers (such as Tax File, Medicare or Centrelink numbers) as identifiers.

The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original or certified copy of your drivers' licence, passport or other primary identification,
- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances and/or if you make an insurance claim, collecting additional information to assess the claim, and
- Information about your financial needs, goals and objectives.

It is important that you provide us with complete and accurate information, as we use this to develop appropriate strategies and research suitable financial products that suit you. While we will take all reasonable steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you choose to give us incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

How do we collect personal information?

Typically, we will collect personal information directly from you, using a combination of meetings and questionnaires, or via our website where you send a request that includes personal information.

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who jointly with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth). In this regard, we are bound by The Privacy (Tax File Number) Rule 2015 (TFN Rule) issued under the Privacy Act, which regulates the collection, storage, use disclosure, security and disposal of individual's TFN information; and
- certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).

How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia and owned by us or external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold.

For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Who do we disclose your personal information to, and why?

We may provide personal information about our customers to organisations outside of us.

In some instances, these organisations may be based overseas. We currently have an outsourcing arrangement that store data in the Philippines.

To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- authorised representatives and credit representatives who sell products and services on our behalf;
- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments);
- other organisations, who jointly with us, provide products or services to you;
- other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, funds

managers and portfolio service providers;

- debt collectors;
- our financial advisers, legal advisers or auditors;
- your representatives (including your legal adviser, accountant, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside of us where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

Where your information is shared with a third party outside Australia, we will take reasonable steps to satisfy ourselves the third party has arrangements to comply with the Australian Privacy Principles.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

Do we use or disclose personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through the Halpin Wealth Partners website.

We may also disclose your personal information to companies outside of us who assist us to market our products and services to you.

If you don't want to receive marketing offers from us please contact us.

Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- Which pages are viewed;
- How users navigate through the site and interact with pages (including fields completed in forms and applications completed);
- Location information about users;
- Information about the device used to visit our website; and
- IP addresses.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site, or be retrieved by any non-Halpin Wealth Partners site.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question about your account. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Access to and correction of personal information

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information.

If we refuse to give you access to or to correct your personal information we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

Resolving your privacy concerns and complaints – your rights

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

Australian Financial Complaints Authority

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving providers of financial services.

AFCA can be contacted at:

Australian Financial Complaints Authority Limited
GPO Box 3
MELBOURNE VIC 3001
Phone: 1800 931 678
<https://www.afca.org.au/>

Office of the Australian Information Commissioner

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

Privacy Complaints
GPO Box 5288
SYDNEY NSW 2001

Phone: 1300 363 992

Fax: 02 6123 5145

Contact us

You can contact us by:

writing to us at:

Halpin Wealth Partners Pty Ltd
GPO Box 2005
ADELAIDE SA 5001

phone 08 8104 9111

email advice@halpinwealth.com.au

web www.halpinwealth.com.au

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to GPO Box 2005, ADELAIDE SA 5001

Changes to the Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on our website www.halpinwealth.com.au.

Things you should know

This policy is current as at 2 May 2024. From time to time, we may make changes to our policy or policies, processes and systems in relation to how we handle your personal information. We will update this policy to reflect any changes.