

# Privacy Policy

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Symmetry Group Pty Ltd  
AFSL 426385

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## **Privacy Policy**

### **1. Background**

Symmetry Group Pty Ltd (“Symmetry”) is committed to providing professional services and respecting the privacy of your personal information. We are bound by the Australian Privacy Principles under the Privacy Act 2001.

This Privacy Policy explains how we will collect, store, verify, use and disclose the information we hold about you and the conditions under which your information may be accessed.

### **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. Collection of Personal Information**

Symmetry collects and maintains personal information that is necessary to enable us to deliver our services or products for our primary business activities.

In the normal course of our business, we only collect information about you when you provide it to us or it is provided to us under your authority.

We will collect personal information directly from you when you apply for a product or a service which we are obliged to do by law prior to providing you with a product or service.

On occasion we may collect personal information about you from third parties, for example credit reporting agencies, share registries or regulatory authorities. Information that we collect will be limited to that required to provide you with our services.

#### *3.1 What type of information does Symmetry collect and hold?*

The type of information we collect and hold about you varies depending on the type of product or service you require.

The personal information we hold about may include:

- Your personal details e.g. name, address, phone number(s), email address(es), occupation, marital status, driver’s licence, financial information including details of your investments, superannuation, insurance policies, estate planning strategies, assets and liabilities, taxation information, health information, tax file number, bank account details, income and expenses, social security information, employment status, goals and objectives, dependants; and
- Any other relevant information that you provide us to enable us to provide you with a product or service.

In most circumstances, the information that we hold about you has been provided to us by you or under your authority. If we have received information that is not required in order to provide services to you, we will either advise you that we hold this information or destroy it.

Other purposes for which we may need to collect and use your personal information will include:

- To comply with legislative and regulatory requirements (including the AML/CTF 2006 Act)
- To comply with the Compulsory code of ethics applicable to the industry from 1<sup>st</sup> January 2020 and by 1st January 2023, Under Division 8B of Part 7.6 of the Act, we must be covered by a Compliance Scheme approved by ASIC that sets out:
  - i. how the monitoring body monitors compliance with the Code of Ethics by the relevant providers who are covered by the scheme which may require us to disclose client information to the monitoring body; and
  - ii. Monitoring bodies have the power to investigate breaches and potential breaches of the Code, and impose sanctions set out in their compliance schemes if they determine that a breach has occurred.
- To enable us to perform administrative operations such as accounting, record keeping and archival retrieval; and
- To enable us to contact you when conducting marketing.

You may choose not to provide us with your personal information. In this case we may not be able to deal with you, including providing a financial product. Under the AML/CTF laws we must be able to identify our clients and verify their identity.

### 3.2 *How does Symmetry use this information?*

Where required, we collect, use and exchange your information so that we can:

- Establish your identity and respond to your queries;
- Make improvements and set the price and design for our products, services and marketing;
- Administer our products and services;
- Manage our relationship with you and keep you updated on important information, products and services that might interest you;
- Manage our risks and prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- Comply with our legal obligations; and
- We may also collect, use and exchange your information in other ways where permitted by law.

## **4. 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.

## **5. Sharing your Information**

Symmetry may share information with organisations that assist us to administer your investments or provide you with products and services including our internal and external service providers such as administrators.

The organisations receiving this information are not permitted to use your information for any purpose other than the specific purpose it was provided. Where we provide your personal information to outsourced service providers we may use from time to time to deliver our services or products, we will require our outsourced service providers to comply with your privacy rights and our policy requirements.

There are circumstances under which Symmetry may disclose your personal information such as:

- When the disclosure is required by law (for example, disclosed to the Australian Taxation Office, AUSTRAC or Centrelink);
- Authorised by law (such as where disclosure is necessary in the public interest or to protect our interests);
- In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. In the event that a sale of our business occurs, we may transfer your personal details to the purchaser of the business. As a client, you will be advised of such a transfer; and
- Responding to subpoenas, court orders and other legal processes.
- Responding to requests and notices by the Code of Ethics monitoring body; and

We will also disclose your personal information if you give your consent for us to do so. We do not sell mailing lists or provide client information to parties for anything unrelated to our business activities.

### *5.1 Request(s) for access to personal information*

Under the Australian Privacy Principles you are generally entitled to access the information we hold about you. Where you are entitled to access, the time we require to give you access will depend on the type of information requested. If we can, we will answer your question immediately.

We will also try to answer you in the same way that you ask, for example, if you telephone to ask for the information we will if practicable, give you that information over the telephone. We will generally respond to a written request in writing.

Sometimes we will ask that you put your request in writing, for example, where you want copies of material or access to older information or files which are not current or it is necessary for us to retain record of your request.

We may also ask you to identify yourself to our satisfaction.

There are certain conditions under which we may refuse you access to your personal information, such as when your request may unreasonably impact upon another person's right to privacy. If we are entitled under the Australian Privacy Principles to refuse to give you access, we will tell you and provide reasons for our decision.

## 6. 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 user name 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 user name 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.

## 7. Storage and Security

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. Your personal information may be kept in hardcopy or electronic form, such as with the use of Google Drive and Adviserlogic (CRM). In the event there is a significant privacy breach, at law we are required to notify you and also report the breach to the Office of the Australian Information Commissioner.

In the event you cease to be a client of Symmetry any personal information which we hold about you will be maintained in a secure manner for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed. Symmetry will ensure that any documents that are destroyed are done so in a secure manner.

## 8. Sending Information Overseas

We may disclose personal information to (include types of recipients to whom you will disclose personal information and where those recipients are located outside of Australia). These recipients may be located in the following countries:

- India
- Philippines

We will not send 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,
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has 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

## **9. 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.

## **10. What if some information Symmetry holds is wrong?**

Please tell us. We want our records to be accurate, complete and up to date and we rely on the accuracy of the information to provide you with appropriate recommendations. Unless we disagree with you about the accuracy, currency or completeness of a record, we will generally correct it if requested, (or suggest alternative arrangements for updating our records).

If we disagree with you, we will give you our reasons and record your objections on file.

## **11. 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 7 days.

Compliance Manager:

Address: PO Box 8104, Subiaco East WA 6008

Telephone: (08) 6380 1400

Email: [Lauren@symmetrygroup.com.au](mailto: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](http://www.oaic.gov.au) and in writing to:

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