

Privacy Policy

Fulcrum Wealth

ABN 73 144 969 924

AFSL Number: 461521

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1. Introduction

Your privacy is important to Fulcrum Wealth Management Pty Ltd ('Fulcrum Wealth') and its Representatives. We understand that when you trust a financial adviser or company, you want your personal information to be handled confidentially and securely.

We have developed this Privacy Policy to demonstrate our commitment to protecting your personal information and you can feel information is secure when dealing with us.

- (a) Fulcrum Wealth is bound by the Privacy Act 1988 (Cth) ('Privacy Act') and the Australian Privacy Principles (APPs).
- (b) Fulcrum Wealth will update this Privacy Policy as required. If it is changed, a new version will be posted on our website, so you remain aware of current processes in relation to the information we collect, how the information may be used, and under what circumstances it may be disclosed by us. Therefore, we recommend you revisit this Privacy Policy periodically.
- (c) Please note that if at any time we are required by law to release information about you or an entity of which you are affiliated, Fulcrum Wealth must cooperate fully.
- (d) This Privacy Policy does not apply to acts or practices of Fulcrum Wealth that are directly related to employee records of current or former employees.

The words "we", "us" and "our" are used to refer to Fulcrum Wealth Management Pty Ltd, ABN 73 144 969 924, Australian Financial Services Licence (AFSL) Number 461521.

2. Personal Information

As part of building our relationship and understanding of you and your personal circumstances, we need to collect certain personal information about you. In order for us to provide our advice and services, we will need to obtain and hold personal information that identifies you. The personal information we are likely to collect and hold includes your name, address and contact details, your date of birth, gender, tax residency, details about members of your family, your occupation, educational qualifications, government identifiers such as your tax file number, details about your financial circumstances including assets, liabilities, income and expenses, bank details, goals and strategies, risk tolerance, insurance arrangements and records of transactions and interactions with us.

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 advisor, accountant, mortgage broker, 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
- Insurers, re-insurers and health care providers.
- Electronic sources, such as you visiting our website

2(a) Sensitive and Health Information

As part of understanding more about you and your circumstances, we may also collect and hold sensitive information about you, such as health information relating to your health, medical history, genetic information and lifestyle, to provide financial advice about or assist you in applying for personal (life) insurance. Health information may include, but is not limited to, health records, patient notes including symptoms and or diagnosis, test results, specialist reports, health services you have received or will receive, prescriptions, appointments and billing details, dental records, genetic information, etc. We generally do not use or share this information for any purpose other than the underwriting, application, pre-assessment or administration of an insurance policy, claim or account in your name, or where you are listed as the life insured, or as otherwise notified to you at the time we collect your information. Your health information may be disclosed to or sourced from a nominated medical professional(s) or a life insurance office(s) with your consent.

Other than the above, we generally do not collect sensitive information about you unless required by law or where you consent for us to do so and it is required for us to collect in order to provide our services to you. Sensitive information includes information or an opinion relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, and criminal record.

2(b) Interaction with Other Legislation

We are also required under the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006, and its corresponding rules and regulations, to implement client identification and verification processes before providing certain services; and the obligation is ongoing where you choose to engage us for ongoing advice. We may need you to present identification documents such as a passport and/or driver's licence and documents to verify related entities in order to meet our obligations.

In addition, we may also need to collect other personal information under some laws. These include the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Corporations Act 2001 (Cth), the Insurance Contracts Act 1984 (Cth), the National Consumer Credit Protection Act 2009 (Cth), the Income Tax Assessment Act 1936 (Cth), and the Tax Laws Amendment (Implementation of the FATCA Agreement - U.S Foreign Account Tax Compliance Act) Act 2014 and (Implementation of the Common Reporting Standard) Act 2016, Act.

3. Consequences of Not Providing Personal Information or Anonymity

The information that we seek to collect about you will depend on the products or services that we provide. You have the right to remain anonymous and not to provide us with any or all of your personal information. However, Fulcrum Wealth specialises in providing personal financial advice and developing strategies that take into account your personal circumstances, objectives and needs. Where we do not have the required information, it is inaccurate or incomplete, we may not be able to provide you with personal advice or the advice, product or service may not be suitable to you or limited in some way. Where you provide limited information, we will make you aware of any limitations or risks of any advice we may provide.

4. Collection and Use of Personal Information

Fulcrum Wealth collects your personal information to provide our services to you and your personal information will only be used for this purpose, a related purpose or where you would reasonably expect us to use the information for a different purpose. For example, we may use the information you provide us to:

- Prepare an appropriate advice document for you or a related entity
- Provide you or a related entity with financial services
- Provide you or a related entity with a review of your current financial strategies, circumstances, products and investments
- Help you to apply for or manage a product(s) and or service(s) we recommend to you or for which you instruct us to
- Manage your ongoing requirements and our ongoing relationship with you
- Verifying your identity for security reasons
- Comply with legal and regulatory requirements, and prevent fraud or crime, or other activity that may cause harm in relation to our products or services
- Provide you with information about products and services that may be of interest to you
- Managing and improving the product(s) and or service(s) we offer, such as invoicing or client surveys
- Assisting you with your questions and requests

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party to complete services on your behalf.

Fulcrum Wealth may use the personal information you have provided to send you information (either by e-mail, phone, SMS or post) that you request or for the purposes of direct marketing. If at any time you receive material that you did not request or do not want to receive such material anymore, please contact us immediately. Further information is in the section titled 'Correcting and Updating Your Profile' below.

5. Disclosure of Personal Information

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

- Our employees, agents, contractors, individuals or organisations who assist us to provide our services, including those from whom we obtain quotations, software providers, IT services and hosting, cloud storage providers, marketing, communication, administration and paraplanning services, temporary staff as required, accountants, legal advisers, compliance consultants and auditors
- Insurers, re-insurers and health care providers, including information about your health, where you have applied for insurance cover or made a claim, including information about your health
- Financial services organisations, including banks, lenders, insurers, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers
- Payment systems operators (for example, merchants receiving card payments)
- Debt collectors
- Organisations we use to collect or verify your identity
- Your nominated representatives including, but not limited to, your legal advisor, accountant, auditor, mortgage broker, family members, executor, administrator, guardian, trustee or attorney
- Your legal personal representative, or any other person who may be entitled to receive your death benefit, or any person who has contacted us to assist in processing that benefit
- External dispute resolution schemes
- Regulatory bodies, government agencies and law enforcement bodies in any jurisdiction, required by law
- You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances
- Where we are permitted to disclose the information under the Privacy Act
- Professional member associations in the monitoring of its members, of which our advisers are required to be members and to adhere to a Code of Professional Practice
- Other companies or individuals, in the event of a proposed or actual corporate sale, merger, reorganisation, dissolution or similar event, which may include the transfer of business assets, such as personal information

Fulcrum Wealth will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you outside of this policy, unless you consent or we are required to meet our legal, regulatory, licensing and or membership obligations.

5(a) Disclosure of Your Information Outside Australia and Use of Third Party Applications and Service Providers

We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats such as secure cloud storage. Your information may be accessed outside of Australia by Fulcrum Wealth Representatives and employees, for example, when they are on holidays. Fulcrum Wealth also utilises information technology providers for the storage of client files, data, information, obtaining consent and interactions such as emails.

In order to provide our services, we may use or recommend the use of third party applications or service providers, which may collect your personal information or we may be required to disclose your personal information to provide our services.

We may disclose your personal information overseas as we engage the services of these providers, who may be based in Australia or overseas, and have all or part of their operations overseas, store data overseas, access services overseas or utilise third parties who are overseas.

Overseas locations of organisations, data centres and third parties may include, but are not limited to, USA, member states of the European Union, United Kingdom, Taiwan, Singapore, Malaysia, Hong Kong, Japan, South Korea, Philippines, South Africa, New Zealand, Canada, Brazil, Chile and the United Arab Emirates.

Fulcrum Wealth maintains an Outsourcing Policy when selecting service providers to ensure quality providers are selected and that their privacy policy aligns with our philosophy of protecting our clients' privacy. We generally require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles.

We provide a list below of the third party service providers and third party applications we may use or recommend the use of, including links to their privacy policy and where available, their data centre locations.

- Google G-Suite (Cloud File Storage, Emails, Calendars, Online Meetings and Business Applications)
[Link to Privacy Policy](#)
[Link to Data Centre Locations](#)
- IRESS (Customer Relationship Management, Portfolio Reporting and Financial Planning Software, and Cloud File Storage)
[Link to Privacy Policy](#)
[Link to Data Protection Policy](#)
- Microsoft OneDrive (Cloud File Storage and Business Applications)
[Link to Privacy Statement](#)
[Link to Data Centre Locations](#)
- DocuSign (Electronic Signature and Document Storage Application)
[Link to Privacy Policy](#)
[Link to Data Residency Information](#)
- FinaMetrica (Risk Profiling and Analysis Tool)
[Link to Privacy Policy](#)
- Morningstar (Portfolio Research Tool)
[Link to Privacy Policy](#)
- M2 Commander (VOIP Telephone Service)
[Link to Privacy Policy](#)

6. Security of Your Personal Information

Fulcrum Wealth has security measures designed to protect against the loss, unauthorised access, misuse, disclosure and/or modification of the personal information under its control.

Some of the security measures we have adopted include access privileges on all computers, programs and mobile devices accessing our IT systems, data backups, controlled access to our principal place of business, securing paper files and clauses in employee and contractor agreements regarding confidentiality.

Unfortunately, the transmission of any data, including your personal information, over the internet is not completely secure. Whilst we will endeavour to protect your personal information, it is possible that third parties, outside our control, may be able to access, obtain or intercept transmissions or private communications without our knowledge or consent. As a result, we cannot ensure the security of data, and any transmissions or electronic communications between us are undertaken knowing this risk. Just as we take reasonable steps to secure all computing devices used in connection with our website, software, system and services, we recommend you do the same and ensure any storage or portable devices, such as your mobile phone are secure.

7. Accuracy, Accessing, Correcting and Updating Your Personal Information

It is important that the information we hold about you and any related entity is accurate, complete and current, as this information may form the basis on which we provide our services and allows us to provide these services efficiently. We encourage you to correct, modify or update the information we have for you or a related entity by contacting your adviser or the person named below. Information can be provided to your adviser by telephone, mail, email, electronic form or any other agreed means between you and your adviser.

You may gain access to the information that Fulcrum Wealth has collected about you, by contacting your adviser or the person named below. We will not charge you for responding to such a request, unless we incur costs in providing the information. We will inform you of any costs prior to proceeding.

In certain circumstances, we may refuse access to or a request to correct and or update your personal information. If these circumstances apply, we will inform you of this and where possible, the reasons for our refusal and how you can complain if you are not satisfied.

8. European Union General Data Protection Regulation (GDPR)

If you are a resident of or a business 'established' in a country that is a member of the European Union Economic Area (the EU and Norway, Lichtenstein and Iceland), you are entitled to additional protections provided by the GDPR, other than the protections already afforded to you under the Privacy Act.

In certain circumstances, this may include, but is not limited to, the right to:

- have your personal information erased
- access your personal information in an electronic and portable format
- restrict, object or withdraw your consent to the processing of your personal information

If you require more information about your eligibility to and or these rights, please let us know.

9. Questions or Complaints

If you have any questions about our Privacy Policy, please contact us on the details listed below.

You may make a complaint about Fulcrum Wealth's handling of your personal information, or in relation to your dealings with us about your personal information, by contacting the details below.

Fulcrum Wealth handles any complaints received according to its Dispute Resolution Policy. Your rights are detailed in our Financial Services Guide (FSG).

In the first instance, we suggest you speak directly to your adviser and have an honest discussion with them about your complaint or concerns. You also have the option of writing to or emailing your adviser.

Where you are uncomfortable with this approach, are not sure who to contact or you have not been able to satisfactorily resolve the matter with your adviser, please contact our office on 02 9223 3822 and speak with the Complaints Officer. In order to efficiently manage your complaint we may request or assist you to detail your specific concerns in writing.

Generally, we will provide you with a written acknowledgement of your complaint within 48 hours and then provide a formal response to your complaint within 45 business days.

If you are not satisfied with the response you receive or the complaint cannot be resolved within the 45 business days, you have the right to contact the Australian Financial Complaints Authority (AFCA). AFCA are a free and independent, ASIC-approved external dispute resolution body of which we are a member. Their contact details are as follows:

Address: GPO Box 3
Melbourne VIC 3001
Phone: 1800 931 678 (free call)
Email: info@afca.org.au
Website: www.afca.org.au

You may also contact the Australian Securities and Investments Commission (ASIC) by phoning 1300 300 630 to make a complaint and obtain information about your rights.

In addition, under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information, by contacting the Commissioner at, GPO Box 5218, Sydney NSW 2001, 1300 363 992 or enquiries@oaic.gov.au.

If your complaint requires us to contact a third party, we may need to give some of the information contained in your complaint to that party.

10. Your Privacy upon Termination of Our Services

We may be required to maintain your personal information even after our relationship has ended to assist you in responding to queries you may have or assisting you to transition your financial affairs or to meet our regulatory and or document retention requirements. Once our obligations have ended (usually between seven to ten years), you can request for us to delete your personal information by contacting your adviser or the person named below. Otherwise, we will only keep information for as long as is reasonably necessary, after which we may delete your personal information.

We are required under the current legislation to hold personal information for seven years following the cessation of your relationship with us. In some instances, the information we hold may be required to be held for longer.

11. Electronic Personal Information and Use of Our Website

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 and links accessed
- 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 devices and browsers used to visit our website
- IP / server 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 or retrieved by any another website. We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platforms that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Links to external websites located on our website are not covered by our Privacy Policy and you should review their Privacy Policies when using their websites.

12. Changes to Our Privacy Policy

We may amend this Privacy Policy periodically and the latest version is publicly available on the Fulcrum Wealth website www.fulcrumwealth.com.au or you can contact us on the details below for a copy of the policy in another format (where available).

13. Client Consent

By accessing our website, www.fulcrumwealth.com.au, contacting us or by asking us to assist you, you consent to the collection and use of the information you have provided us with for the purposes described in this policy.

Where you have provided information about your partner, a related entity or other persons relevant to you, for the services you have engaged us for, please make these people aware of the information you have provided and our Privacy Policy. Where you have provided personal information about children under the age of 16, as their parent or guardian in this capacity, you have given your consent for us to hold this information.

14. Contact Details

If you have any questions about this Privacy Policy, please contact:

The Privacy Officer
C/- Fulcrum Wealth
Suite 2006, Level 20
109 Pitt St
SYDNEY NSW 2000

P: (02) 9223 3822
E: privacy@fulcrumwealth.com.au
W: www.fulcrumwealth.com.au