

## **PRIVACY POLICY**

At Cyberside Investments Pty Ltd trading as Artisan Financial Services, we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

### **What personal information do we collect and hold?**

When we provide you with financial advice, we ask you for the information we need to understand your personal and financial situation so we can tailor our advice to your personal circumstances. We collect your information through various means including our Financial Needs Analysis information form, email and telephone conversations. This can include a broad range of information from your name, address, contact details and age to information about your personal affairs including your assets and liabilities, income and health status.

We may also collect your information from third parties such as your bank, mortgage broker or doctors.

We only collect sensitive information such as information about your finances, health and family circumstances with your agreement and if it is necessary for us to do so to provide you with financial advice tailored to your personal circumstances.

### **How do we use your information?**

We use your personal information to understand your financial position, formulate our professional advice and assist you to apply for any recommended products.

We also use your personal information to manage your ongoing requirements and our relationship with you, e.g. providing you with on-going financial advice. This includes contacting you by mail or electronically (unless you tell us you do not wish to receive electronic communications).

From time to time we will use your contact details to send you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. We may also send you regular updates by email or by post. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

### **What if you don't provide information to us?**

If you do not provide us with some or all the information that we ask for, we may not be able to provide you with financial advice or if we do agree to provide advice we will need to warn you that in the absence of complete information there is a risk that our advice may unintentionally not be in your best interest.

You can contact us without using your name or by using a pseudonym. However we may need your name or contact details to respond to you.

### **Web and mobile data**

We may use our website or third-party software to assist us in collecting your personal information in order to provide you with financial advice

We may use technology such as cookies, beacons, tags, scripts and tracking pixels to collect, store and use anonymous data about how you use our website / mobile technology. This includes your server address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data is used to increase functionality and can also enable us to display information and content that is tailored to our understanding of your interests. This information alone cannot be used to discover your identity.

### **How do we store and protect your personal information?**

We strive to maintain the relevance, accuracy and completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.

We hold the information we collect from you in our financial planning software, our email server and in Google Gmail. When your file is archived it may be sent to an external data storage provider for a period, as is required by law. We only use storage who are regulated by the Privacy Act.

We ensure that your information is safe by requiring staff to agree to client confidentiality as part of their employment agreement and by adopting data security measures as recommended by our IT service consultants e.g. anti-virus software. We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

### **Will we disclose your personal information to anyone?**

We do not sell, trade, or rent your personal information to others. We will disclose your information to fund managers, insurance companies and other product providers that you agree to use. We may also provide your information to other parties, such as your accountant, with your agreement.

We may also need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf, external data storage providers, para-planners who assist us to prepare your financial advice or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. We will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may provide your information to others if we are required to do so by law or under some other unusual circumstances which the Privacy Act permits.

We will not disclose your information to overseas recipients.

### **How can you check, update or change the information we are holding?**

You may ask us for access to your personal information and to correct it at any time.

Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information or complying with a correction request.

To access or correct your personal information, for Perth clients please write to Stephen Ramsay P.O. Box 267, West Perth, W.A. 6872. For Sydney clients, please write to Andrew Ramsay at P.O. Box 553, Spit Junction NSW 2088.

We do not charge for providing access to personal information.

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

### **What happens if you want to complain?**

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer at Stephen Tangney, PO Box 841, Subiaco WA 6904.

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

### **Your consent**

By asking us to assist with your financial planning needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

### **Updating this policy**

This Privacy Policy was prepared on 16 December 2021. We may update it at any time. The new version will be published on our website.

