

Beacon Group Privacy Policy

This privacy policy applies to the services offered by Risk and Investment Advisors Australia Pty Ltd (ABN 21 104 922 394, AFSL 238141) ("**RIAA**"), The FinancialLink Group Pty Ltd (ABN 12 055 622 967, AFSL 240938) ("**TFLG**"), Libertas Financial Planning (ABN 27 160 419 134, AFSL: 429718) ("**LIB**") collectively referred to as "**Beacon Group**" and its Authorised Representatives.

We respect the importance of your privacy. This Policy outlines how Beacon Group manages the personal information it holds about you, our customer.

It is Beacon Group's policy to respect the confidentiality of information and the privacy of individuals. Beacon Group is bound by the Australian Privacy Principles contained in the Commonwealth Privacy Act (1988) as amended via the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The Beacon Group Privacy Policy will be reviewed from time to time to take into account new laws, technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current Beacon Group Privacy Policy.

Privacy Considerations

Keeping records about individuals is necessary and important. The information Beacon Group receives from its clients is personal and confidential. Without this information however, it would be difficult to assess a customer's needs. Both the general and common law impose confidentiality obligations on organisations such as Beacon Group which in some respects are similar to those which exist with solicitor/client relationships. Beacon Group supports these principles and has processes in place to respect them.

The legislation contains principles that include the following:

- Personal information must only be collected for a purpose which is lawful, and which directly relates to a function or activity of the collector;
- The collection of that personal information must be necessary for, or directly related to that purpose;
- The collector must tell the individual concerned of the purpose for which the information is being collected;
- If the collector intends to pass the information to another party, the person providing the information must be told this.
- Any information collected should be relevant, up-to-date where appropriate, and complete; and
- Once collected, the personal information must be protected by appropriate safeguards against loss, and also against unauthorised access, use, modification or disclosure to unauthorised or inappropriate persons, and other misuse.

Beacon Group support and abides by the following thirteen Australian Privacy Principles (**APP**) outlined in the Act.

PART 1: CONSIDERATION OF PERSONAL INFORMATION PRIVACY

APP 1: Open and transparent management of personal information

Beacon Group have practices, procedures and systems to comply with the APP including a complaint process to deal with any complaints by individuals about Beacon Group's compliance with the APP.

APP 2: Anonymity and pseudonymity

You have the option of not identifying yourself or you may use a pseudonym where it is not required when entering transactions with Beacon Group wherever it is lawful and practicable.

In most circumstances however, it would not be practicable to not identify yourself when receiving financial advice or transacting other business with Beacon Group or any of its authorised representatives.

PART 2: COLLECTION OF PERSONAL INFORMATION

APP 3: Collecting of solicited personal information

Beacon Group is committed to safeguarding your personal privacy. We recognise that you have a right to control how your personal information is collected and used. We know that providing personal information is an act of trust and we take that seriously. Unless you directly give us consent to do otherwise, Beacon Group will only collect and use your personal information contained within the Confidential Client Data Questionnaire and file notes for the purpose of providing you with the financial services discussed and communicated directly with you.

As Beacon Group offers a variety of products and services, a number of them may be of interest to you. Any personal information we collect may be used to gauge your suitability for only the products or services that have been discussed with

you. We will acquire your explicit permission before we use any personal information to gauge your suitability for any of our other products and services.

Beacon Group will not collect or monitor any personal information about you without your consent. The only personal information we collect is what you tell us about yourself.

APP 4: Dealing with unsolicited personal information

Where Beacon Group receives information that has not been solicited in accordance with APP 3 above or could have been solicited in accordance with APP 3, Beacon Group will ensure the information is destroyed or de-identified.

APP 5: Notification of the collection of personal information

Beacon Group provides identification and contact details through its various disclosure documents. Beacon Group will also explain to you the purpose for collecting the information, the consequences if information is not collected, other entities requiring the information, your accessibility to your personal information, the complaints process and whether your information will be disclosed to overseas recipients.

PART 3: DEALING WITH PERSONAL INFORMATION

APP 6: Use and disclosure of personal information

We intend to use your information for the following purposes only:

- To fulfil our obligation under any contract and/or any other contract between you and Beacon Group;
- To provide you with information about our products, services and/or special offers unless you explicitly request us not to;
- To ask you for your opinion or comments about our products and/or services. You may answer at your discretion; and
- To track general traffic patterns showing in usage of certain services that we offer, without identifying the usage patterns of any particular individual.

As Beacon Group recognises the trust that you place in us when you give us your personal information, we will not use or disclose any information about you for other purposes without your consent, except for in exceptional cases as required by laws or where it is necessary to protect the rights or property of Beacon Group, or any member of the public, or to lessen a serious threat to a person's health or safety.

APP 7: Direct Marketing

Beacon Group will not use your personal information for direct marketing purposes without your Consent.

We may contact you by mail, telephone or at your email address, which you provide us in order to:

- Provide you with information which may be of interest about updates, new Beacon Group products and other matters which may interest you; and
- To send you a newsletter.

You can opt out of any direct marketing.

If you are receiving communications from Beacon Group and do not wish to receive this information any longer, you may remove your name from our list either by telephoning us on 1300 133 511, emailing us at enquiries@beacongroun.com.au or you may also write to us. Please address your correspondence to: The Compliance Manager, PO Box 1472, Sydney NSW 2001.

APP 8: Cross border disclosure

Beacon Group will only transfer personal information about you to someone who is in a foreign country if:

- (a) We reasonably believe that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the National Privacy Principles; or
- (b) You consent to the transfer; or
- (c) The transfer is necessary for the conclusion or performance of a contract between you and the organisation, or for the implementation of pre-contractual measures taken in response to your request.

Your personal information will then only be transferred if we believe it to be for the benefit of you, or if it is impracticable to obtain the consent from you for that transfer and if so, if we believe that you would be likely to give consent.

We will take reasonable steps at all times to ensure that the information, which has been transferred, will not be held, used or disclosed by the recipient of the information inconsistently with the National Privacy Principles.

APP 9: Adoption, use or disclosure of Government identifiers

Beacon Group does not use as a client identifier any number, code or other form of identifier used by any agency or other external entity (eg: your tax file number if collected). Similarly, we will not disclose any identifier assigned to an individual by an agency unless it is necessary for us to fulfil our obligations to that agency.

PART 4: INTEGRITY OF PERSONAL INFORMATION

APP 10: Quality of personal information

Beacon Group will take all reasonable steps to ensure that your personal information is used and or disclosed in an accurate, complete and up-to-date manner. Naturally, this information will only be as accurate as our clients provide it to us.

APP 11: Security of personal information

Beacon Group will also endeavour to take all reasonable steps to keep secure any information that we hold about you and to protect it from misuse and loss and from unauthorised access, modification or disclosure. Our employees and data processors are obliged to respect the confidentiality of any personal information held by Beacon Group. We will take reasonable steps to destroy or permanently de-identify your personal information if it is no longer needed for any purpose for which the information was originally intended.

Beacon Group provides links to certain industry related web sites outside the Beacon Group site. These linked sites are not under the control of Beacon Group, and we are not responsible for the conduct of companies linked to our website. Before disclosing your personal information on any other web site, we advise you to examine the Terms and Conditions of those web sites.

As we cannot guarantee the security of communications over the Internet, we are not able to give absolute assurance that, if your personal information is provided to Beacon Group via this medium, it will be secure at all times. Beacon Group will not be held responsible for events arising from unauthorised access to your personal information.

PART 5: ACCESS TO, AND CORRECTION OF, PERSONAL INFORMATION

APP 12: Access to personal information

If at any time you want to know what information we hold about you, you are welcome to request your personal information by contacting us.

Under extreme circumstances we may not be able to provide you with access to your personal information. Where this is the case, we will write provide in writing, the reasons for this decision.

APP 13: Correction of personal information

If you want to change and correct personal information that is inaccurate or out of date, please let us know. To have personal information deleted, please let us know in the same manner, and we will take reasonable steps to delete your personal information unless we need to keep it for legal reasons.

What if you have a complaint?

If you consider that any action of Beacon Group breaches this Privacy policy Statement or the Australian Privacy Principles or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly.

To make a complaint, please forward it in writing to:

The Privacy Officer
Beacon Group
PO Box 1472
Sydney NSW 2001

If you are not satisfied with our response to your complaint, you can phone the Commonwealth Privacy Commissioner's hotline on 1300 363 992.