



Privacy Policy

Dated 4th January 2022

Benjamin Allen and Philippa Hogg are authorised representatives of BrightPath Financial Planning AFSL no. 534041.

Protecting your personal information is of utmost importance to us as we understand how important it is to you, our valued clients. We take our obligations under the Privacy Act 1988 (Cth) and applicable state/territory privacy acts very seriously. These Acts require us to handle your personal and health information in accordance with the Australian Privacy Principles (APPs) and any relevant state/ territory health privacy principles.

If you have provided us with a signed third-party authority or power of attorney, we will disclose information to only those named individuals you have authorised.

What is Personal Information?

Under the Privacy Act 1988, personal information is defined as information or an opinion about an individual whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Some personal information is further classified as '**sensitive information**'. Under the Acts referenced, sensitive information is personal information or an opinion about an individual's health, ethnic or racial origin, political opinions, membership of political associations, religious beliefs or affiliations, philosophical beliefs, trade union membership, professional or trade association membership, sexual preferences or practices, criminal record or biometric information that is to be used for certain purposes.

How we collect the information

We collect your personal information to give us adequate information about you to provide you with financial planning advice and recommend appropriate products and services to you. We collect this information directly from, from your superannuation and other investment providers. We can also obtain information if you attend one of our seminars or workplace visits.

Your personal information may also be provided to us by your accountants, lawyers, or government agencies such as Centrelink or the ATO. When personal information is collected from third parties such as an accountant or another super fund, it is only collected with a third-party authority provided by you.

What personal information do we collect and hold about you?

We may collect a range of personal information about you. This may include, but not limited to:

- name, address, date of birth and contact details;
- Tax File Number (TFN);
- employment details and employment history;
- financial information such as bank balance, superannuation balance, assets, liabilities, investments, insurance, income and expenditure;
- payment information including bank account and credit card details;
- information about your family corporate structure, such as entity or any trusts and its beneficiaries and settlors;
- information about your family commitments and social security eligibility and entitlements;
- details of your financial circumstances and objectives including your risk tolerance;
- information about your beneficiaries;
- details about your citizenship, residency or visa status; and

How we use your personal information

We use your personal information to:

- provide you with personal financial planning advice and the implementation of such advice.
- establish investment products on your behalf including superannuation funds and managed funds.
- provide you with information and services about us.
- conduct identity verification that may be needed to invest in products.
- comply with all applicable laws.

In certain instances, we may disclose your personal information to certain third parties so that they may use and disclose your personal information for any of the purposes referred to above. Such third parties may include:

- superannuation and managed fund administrators;
- insurers;
- legal advisers;
- accountants

- death benefit beneficiaries;
- government agencies (e.g. the ATO, Centrelink, Department of Veteran Affairs)

Data Breaches

We must report certain data breaches to the Office of the Australian Information Commissioner (OAIC) and where required, the impacted members.

You have rights under the Australian Privacy Principles to request access to and correction of information we hold about you. We encourage you to advise us of any personal detail changes as they occur.

Enquiries and Complaints

If you have any questions about privacy or would like to enquire or make a complaint about a breach of your privacy, please contact Benjamin Allen ben@brightpathfp.com.au or Philippa Hogg pip@brightpathfp.com.au and we will respond to you within 30 days of your enquiry or complaint. If you are not satisfied with the resolution of your complaint by our Privacy Officer, you can contact the OAIC by telephone on 1300 363 992 or by email at enquiries@oaic.gov.au.

Notification of Changes

We may update this Privacy Policy from time to time. Our up-to-date Privacy Policy is published on our website. All information about you which is held by us, will be governed by our most recent Privacy Policy. If you are unsure whether you are reading the most current version of this Privacy Policy, please contact us.