

PRIVACY POLICY

At Think Independent Pty Limited, we are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws, how you can access the personal information we hold about you and how to have that information corrected.

What information do we collect and how do we use it?

When we provide financial planning services, we ask you for the information we need to gain an adequate understanding of your circumstances. This can include a broad range of information ranging from your name, address, contact details and age to other information about your personal affairs including investment and insurance documentation, tax returns and Wills.

We do not provide the information that you provide to us to any other party, unless required to do so by law or requested by you.

We also use your information to enable us to manage your ongoing requirements and our relationship with you, e.g. ongoing advice services. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

From time to time we will use your contact details to send you offers, updates, events, articles, newsletters or other information about services 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.

We may also use your information internally to help us improve our services and help resolve any problems.

What if you don't provide some information to us?

If you do not provide us with some or all of the information that we ask for, we may not be able to provide the services requested.

How do we hold and protect your information?

We strive to maintain the relevance, reliability, accuracy, 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 or ethical reporting or document retention requirements.

We hold the information we collect from you primarily via electronic records. We may also maintain a physical file containing your details. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by only using service providers located in Australia and regulated by the Privacy Act. We maintain physical security over our paper and electronic data and premises, by using locks and security systems.

Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others or disclose it to overseas recipients.

We will disclose your information to contractors who supply services to us, e.g. to handle mailings on our behalf or external data storage providers, or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, 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 unusual other circumstances which the Privacy Act permits.

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

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please write to Privacy Officer, Think Independent, PO Box 693, Warrnambool Victoria 3280.

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

In some limited cases, 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?

If you have any concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer at Think Independent, PO Box 693, Warrnambool Victoria 3280.

Your complaint will be considered by us through our internal complaints resolution process and we will try to respond with a decision within 45 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.

Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact Privacy Officer, Think Independent, PO Box 693, Warrnambool Victoria 3280.

WEB DATA

Anonymous data – We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

Cookies – In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. If you use only temporary cookies, insert “Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.” If you use permanent cookies, insert “They allow the website to recognise your computer when you return in the future”.

Client Portal & Portfolio Tracker – We have engaged external software providers to assist with providing services to clients. These external software providers enable the collection of information via their websites, which is used only by us to provide financial planning services to clients. Please refer to the relevant websites for details on their privacy policies.

