Privacy Policy

Effective date:

Read about how LBW Pty Ltd ATF ABN 40708295730 , LBW Wealth Pty Ltd ABN 56652382128 and LBWFP Pty Ltd ABN 84632407259 (**us**, **we** or **our**) collects, protects, uses and shares your personal information.

Privacy commitment

Your privacy is important to us. We are committed to protecting your privacy and we want to ensure that you have a clear understanding about the information we collect about you, how we use it and who we share it with.

We provide a number of products and services that require us to collect, store, share and use your personal information. This Privacy Policy applies when you use our products or services or interact with our website. It sets out how we collect information about you, how we use it and how we keep it secure.

This Privacy Policy also incorporates our Credit Reporting Policy which sets out how we use any credit information we collect.

In addition to our obligations under the Privacy Act 1988 (Cth) and the Australian Privacy Principles, LBW and its personnel may be subject to additional professional, ethical and confidentiality obligations under applicable laws, professional standards and codes of conduct relating to the taxation, accounting, audit, and financial services we provide.

We are committed to complying with these obligations, including maintaining the confidentiality of information obtained in the course of providing professional services to our clients. We may change this Privacy Policy by publishing changes to it on our website. Please check our website regularly to ensure that you are aware of any changes to this Privacy Policy.

What information do we collect?

Personal information is information about you that is reasonably identifiable (i.e. name, email address, contact details).

Credit information is personal information that is collected in connection with a credit application. This includes identification information, default information or repayment history information.

In this Privacy Policy we use the term **personal information** to refer to both personal information and credit information.

The information we may collect (and hold) about you includes:

- name, address, email address, date of birth, phone number(s);
- Government issued identifiers;
- tax file number;
- information about dependents or family members;
- bank account details or credit or debit card details;
- Medicare number, pension card number;
- accounting and financial information;

- occupation, employment history and details;
- family commitments and social security eligibility;
- financial needs and objectives;
- assets and liabilities (current and future), income, expenses;
- superannuation and insurance details;
- risk profile details;
- details of your interactions with us;
- location information;
- any other relevant information that you give to us for the purpose of providing you with our products or services.

Depending on the services we provide to you we may also collect sensitive information from you such as:

- health information in connection with insurance application forms.

As part of our obligations to verify your identity pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (**AML Act**), we are required to collect sensitive information from you about your membership of or association with a political party where relevant to determining whether you are a politically exposed person or subject to sanctions.

As part of verifying your identity, we also collect biometric information for the purpose of automated biometric verification or biometric identification.

We collect personal information either directly from you or from other people such as:

- related entities;
- suppliers and service providers in connection with providing our products and services;
- Government bodies and services;
- your professional advisers;
- banks, financial institutions and other financial product providers;
- your employer;
- credit reporting bodies;
- fund managers;
- superannuation funds;
- life insurance companies;
- recruitment providers and candidates;
- public sources.

We collect information when you:

- visit our website;
- participate in a meeting (whether in person or via video) or phone call with us;
- through Annature, dropbox links, ASIC, Now Infinity and through ABR login;
- email or otherwise correspond with us.

Why we collect, hold, use and disclose personal information

We will only use your personal information for the purposes for which it was collected (**primary purpose**) or for a purpose related to the primary purpose, if you would reasonably expect us to use the information for that purpose, or otherwise with your consent.

As part of providing professional services, we may collect and hold taxation, financial, corporate and other information required to meet legal, regulatory and professional obligations.

Our primary purposes for collecting, holding, using and sharing (disclosing) your personal information include:

- to provide our products, services and support;
- to send you information about events, products, services and opportunities that may be of interest to you;
- to conduct market research (where we contact you for feedback on our products or services);
- to run and improve our website including your experience with our website;
- to identify and control or minimise risks to our products or services;
- to enable us to detect and prevent suspicious or fraudulent activity;
- to monitor compliance with our terms and conditions;
- to provide information to our advisers, including cyber consultants, lawyers and accountants, to help us comply with legal, accounting, or security requirements;
- to protect our legal rights, interests and the interests of others, including in connection with legal claims, resolving disputes, enforcing our rights, compliance, regulatory and audit functions and ensuring data security;
- to verify your identity pursuant to the AML Act;
- for any purpose related to the above.

Do we use your personal information for direct marketing?

No. We do not use your personal information for direct marketing purposes.

Sharing (disclosing) your information

We share your personal information with:

- our related entities;
- suppliers and service providers (including software providers) in connection with providing our products and services;
- artificial intelligence (AI) tools and technology providers used to assist in the delivery of our services;

  Where AI tools are used, we take reasonable steps to ensure they are assessed in accordance with our privacy, confidentiality, security and risk management requirements. We do not intentionally use personal information in a manner that is inconsistent with our professional obligations or applicable privacy laws.;
- banks or other financial institutions;
- fund managers;
- superannuation funds;
- life insurance companies;
- financial product issuers;
- a purchaser of our business;
- specific people authorised by you to receive information held by us;
- government agencies and services, regulatory bodies and law enforcement agencies, or as required, authorised or permitted by law.

Information that we provide to other people will be handled in accordance with their privacy policy.

Sharing (disclosing) your information outside Australia

We share (disclose) personal information outside of Australia to our staff members in the Philippines through The Outsourced Accountant located in the Philippines.

We may engage outsourced personnel and service providers to assist in the provision of our services. Where these providers have access to personal information, we take reasonable steps to ensure they are subject to confidentiality, privacy and security obligations appropriate to the nature of the information they may access.

We undertake due diligence on outsourced service providers and require them to maintain standards that are consistent with our legal, regulatory and professional obligations.

We take reasonable steps to ensure that any overseas recipient will deal with such personal information in a way that is consistent with the Australian Privacy Principles.

Using our website and cookies

We collect personal information about you when you use and access our website.

While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer.

We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

Links

Our website may contain links to websites operated by other people. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in any linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so please read them before using those websites.

How we hold your information to keep it safe

We hold your personal information in either electronic or hard copy form. We will not keep copies of identification documents for longer than necessary or otherwise authorised by law.

We retain personal information for as long as it is needed for the purposes for which it may be used or disclosed, or as required by law or applicable professional obligations Where personal information is no longer required, we take reasonable steps to securely destroy it or de-identify it, unless we are legally required to retain it.

We take reasonable steps to protect your information from misuse, interference and loss, as well as unauthorised access, modification or disclosure. These include a number of physical, administrative, personnel and technical measures, such as access controls, staff training, supervision, monitoring and other security measures to protect your personal information.

For example we:

- impose confidentiality requirements on our employees and train them about how to keep your information safe and secure;
- have policies and procedures in relation to document storage security and security measures to govern access to systems;
- implement firewalls and virus scanning tools to stop viruses and unauthorised access to our systems.

However, we cannot guarantee the security of your information.

Data Breach Management

We maintain procedures for responding to actual or suspected privacy and data security incidents. Where a data breach involving personal information occurs, we will assess the incident and take such action as may be required under applicable laws, including the Notifiable Data Breaches scheme where relevant.

Rights to access your information or seek correction

You can access the personal information we hold about you by contacting us using the information below. Sometimes, we may not be able to provide you with access to all of your information and, where this is the case, we will tell you why. We may also need to verify your identity when you request your information.

If you think that any information we hold about you is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Right to remain anonymous

You can choose not to provide us with personal information. However, if you do this, we may not be able to provide you with any products or services.

Do we disclose credit information to credit reporting bodies (CRB)?

Electronic Identification

We are required to verify your identity under the AML Act before providing you with our services. In order to verify your identity electronically, we will ask for the following personal information:

- name;
- address;
- date of birth; and
- details of and in some cases copies of your identification documents.

Where we verify your identity under the AML/CTF Act, we generally record the relevant information from the identification document and the outcome of the verification process. We will not keep copies of identification documents for longer than necessary or otherwise authorised by law.

You acknowledge that your personal information may be passed on to external organisations including government agencies and CRB. Your personal information may be disclosed to our agents who assist with the electronic identity verification process.

The use of your personal information for electronic identity verification does not constitute a credit check or impact your credit standing in any way. A CRB may inform us as to whether the personal information provided is a full or partial match with information held on credit information files.

Your details will also be submitted to the Australian Government's Document Verification Service (**DVS**). The DVS is a national online system that allows organisations to compare an individual's identifying information with a government record. More information about the DVS is available on their website.

Other methods of verification

You do not have to agree to electronic verification. You can choose for your identity to be verified in person, please just let us know if that is your preference.

How to complain

If you think we have breached the Privacy Act, or you wish to make a complaint about the way we have handled your personal information, you can contact us using the details set out below. Please include your name, email address and/or telephone number and clearly describe your complaint. We will acknowledge your complaint and respond to you regarding your complaint within a reasonable period of time.

If you are not satisfied with how we have dealt with your complaint you can contact the Office of the Australian Information Commissioner using any of the following details:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

www.oaic.gov.au

Contact Us

For further information about our Privacy Policy or privacy practices, to access or correct your information, or make a complaint, please contact us using the details set out below:

Privacy Officer

T: 03 5221 6111

E: lbw@lbwca.com.au

A: PO Box 4115 GEELONG VIC 3220