



- payment details
- personal information about your spouse and dependants
- browser type
- location information
- information about your employer or an organisation who you represent
- professional details
- business information
- corporate/company information
- IP address
- cookie identifiers
- website activity
- facebook username and password
- operating system
- user ID for accessing the website or platform owner's service
- any information required to offer our services

In certain circumstances it may be necessary to collect sensitive information about you to provide specific services or for recruiting purposes. This information could include professional memberships, health information and your criminal record.

How We Collect Personal Information

The Gild Group collects personal information directly from you or from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party.

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that The Gild Group is not responsible for the privacy practices of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

How We Store and Secure Your Personal Information

The Gild Group keep your personal information in your client files or electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements.



We take reasonable steps to protect the personal information that we hold including the use of technology to restrict electronic access to documents, firewalls, 2FA, virus scanning software, encryption, passwords and digital certificates.

Personal information is treated as confidential information and sensitive information is treated as highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed in a secured manner.

With respect to some of the personal information we hold, The Gild Group also engages third parties to host the storage of electronic data.

The purposes for which we collect, hold, use and disclose personal information. The Gild Group collects personal information directly from you or from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party.

The personal information we manage is used to provide our services to you, for administrative purposes including processing payment transactions, to meet regulatory requirements, for recruitment purposes and other business-related purposes.

The Gild Group uses a range of service providers to provide an efficient, effective and secure service. In the provision of our services personal information may be disclosed to the following parties:

- Related Gild Group entities/subsidiaries
- Government or regulatory bodies and agencies
- Professional associations
- Any person acting on your behalf such as solicitor, tax agent, management company and financial advisor
- Our agents, contractors and external service providers including IT providers and debt collecting services

We require our service providers to comply with our privacy guidelines and to ensure personal information is not used for any unauthorised purpose.

Personal information may be available to partners and authorised staff of The Gild Group to use in accordance with this policy. We require our employees and partners to respect the confidentiality of any personal information we hold.

We may use the information you provide to send you information and newsletters outlining services, events, and industry information. If you do not want to receive any marketing information from us or want to be removed from our mailing list, please email info@thegildgroup.com

How We Use Your Personal Information

Primarily, your personal information is used in order to provide advice to you. We may also use the information that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed.

From time to time, we may provide you with direct marketing material. If, at any time, you do not wish to receive this information any further, you may contact us with this request. You will be given the opportunity to “opt out” from receiving communications from us or from third parties that send communications to you. You may “opt out” from receiving these communications, such as newsletters, emails and other marketing and promotional materials, by contacting our office by phone or email and request to be removed from our mailing list.

We maintain details of the source of your personal information used for direct marketing and you have the right to request these details. We will endeavour to meet any requests within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

When We May Disclose Your Personal Information

In line with modern business practices common to many financial and professional services institutions and to meet your specific needs we may disclose your personal information to the following organisations:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service;
- compliance consultants;
- paraplanning contractors or temporary staff to handle workloads during peak periods;
- mailing houses;
- insurance reference bureaus and loss adjusters

- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers;
- another authorised representative of Financial Affairs if necessary;
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them;
- a new owner of our business that will require the transfer of your personal information
- government and regulatory authorities, as required or authorised by law;
- We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers, or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.
- We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of The Gild Group, its customers or third parties.
- If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

Our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by The Gild Group.

The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

The Gild Group takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas, as part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or

outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

Ensure Your Personal Information Is Correct

The Gild Group takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information; and
- update us with any changes to your personal information as soon as possible. If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

Unsolicited personal information

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we'll destroy or deidentify that personal information as soon as practicable.

Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;

- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Dealing with us anonymously or using a pseudonym

You have the option to deal with us by not identifying yourself or by using a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. Should we ever undertake direct marketing, we will only use or disclose your sensitive information with your consent.

This is subject to some exceptions including when:

- collection is required by law; and
- the information is necessary for the establishment, exercise or defence of a legal claim.

Our Website

The Gild Group website may provide links to third party websites. The use of your information by these third party sites is not within our control and we cannot accept



responsibility for the conduct of these organisations. Other websites are subject to our privacy standards. You will need to contact or review those websites directly to ascertain their privacy policies.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Overseas Transfer

Your personal information will not be disclosed to recipients outside Australia unless you expressly request us to do so. If you request us to transfer your personal information to an overseas recipient, the overseas recipient will not be required to comply with the Australian Privacy Principles and we will not be liable for any mishandling of your information in such circumstances.

GDPR

If you are an individual in a country in the European Economic Area (**EEA**), we may be required to comply with the EU General Data Protection Regulation 2016/679 (the **GDPR**) which applies to us when processing the personal information of individuals (**data subjects**) who are in countries in the EEA in relation to offering you our products or services or if we monitor any of your behaviour when in those countries. ABA is a data controller for our website and services provided through our website.

In some circumstances, the GDPR provides additional protection to individuals located in Europe. Where this is the case, there may be additional rights and remedies available to you under the GDPR if your personal information is handled in a manner inconsistent with that law.

Spam Policy

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'. The Australian Communications Authority (ACA) is responsible for enforcing the provisions of the Spam Act. Additional information about the Spam Act and the ACA's role is available from: www.aca.gov.au. 'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone. The Gild Group complies with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, The Gild Group makes sure that our practices are in accordance with the **Australian Privacy Principles** in all activities where they deal with personal information.

Internal Procedure for dealing with complaints

The three key steps The Gild Group follows:

- Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about the person and The Gild Group that is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Comply with the law regarding viral messages

The Gild Group ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have consented to receiving Commercial Communications.

Comply with the age sensitive content of commercial communication

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, The Gild Group takes

reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event.

Complaints Resolutions

The Spam Act specifies that the person's consent has been withdrawn within five working days from the date that an unsubscribe request was sent (in the case of electronic unsubscribe messages) or delivered (in the case of unsubscribe messages sent by post or other means).

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner or the Australian Communications Authority.

The Privacy Officer
The Gild Group Pty Ltd
445 Warrigal Road
Moorabbin, VIC 3186
Email: info@theildgroup.com

If you are not satisfied with our handling of your complaint you may make a complaint to the Australian Information Commissioner (www.oaic.gov.au).

Use of your information outside Australia

We may store, process or back-up your personal information on servers that are located overseas including through third party providers.

In some circumstances The Gild Group also uses third party providers to carry out its functions and provide services.

Policy Breach

The Gild Group treats this Policy as serious, and any breaches will be managed accordingly, up to and including dismissal.



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