SWA FINANCIAL PLANNING

Privacy Policy

Dated: 26 August 2026

At SWA Financial Planning we recognise that your privacy is very important to you – it is to us as well. We handle personal and sensitive information provided by and about people every day. By personal and sensitive information we mean information or an opinion about a person whose identity is apparent or can reasonably be ascertained.

We are committed to supporting the *Australian Privacy Principles* (APPs) set out in the *Privacy Act* 1998 (Cth). Our aim is to both support, and ensure that we comply with, the APPs that form the basis of laws introduced to strengthen privacy protection for the general public. The information set out below is largely a summary of our obligations under the APPs.

In this policy "we", "us" and "our" refers to SWA Financial Planning and "you" refers to any person about whom we collect personal information.

We believe that this policy will address any potential concerns you may have about how personal information you provide SWA Financial Planning is collected, held, used, corrected, disclosed and transferred. If you seek any further information please contact us in one of the ways set out at the end of the document.

What information do we collect and hold?

As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information").

In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal and sensitive information about you, including but not limited to:

- name, date of birth, gender and marital status;
- mailing address, email address, telephone and fax numbers;
- tax file number and tax statements
- employment details and employment history;
- details of your financial needs and objectives;
- details of your current financial circumstances, including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and aversion or tolerance to risk;
- information about your family commitments, health and social security eligibility;
- whether you are an Australian citizen.

Consequences of not providing information

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you

We are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Advice Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information referred to above, we may elect to terminate our retainer with you if we believe we are unable to provide you with a complete service.

How do we collect your personal information?

Generally collection of your personal information will be effected in either face to face interviews, through fact finds, over the telephone, email or mail. From time to time additional and/or updated personal information may be collected through one or more of these methods.

SWA Financial Planning has the ability to record appointments and phone conversations for the purpose of information collection and Record of Advice discussions.

How do we take care of your personal information?

We hold personal information about you in paper-based and electronic records and systems. Personal information may be collected in paper-based documents and converted to electronic form for storage (with the original paper-based documents either archived or securely destroyed).

Information held in paper-based form is generally securely stored at our office or in the case of archived records, at a secure external storage facility in Australia. We use physical security and other measures to ensure that personal information is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure.

We use physical security, password protection and other measures to ensure that personal information stored in electronic form is protected from misuse, interference and loss; and from unauthorised access, modification and disclosure. Data is backed up daily and stored securely off site.

At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

In the event you cease to be a client of this organisation, any original personal information which we hold about you may be maintained in secure storage for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

We use reputable cloud software platforms and carefully selected AI services to host our systems and help with tasks such as document processing, transcription, summarisation and drafting. These providers act on our instructions and must meet strict confidentiality and security standards.

Our core systems are hosted in Australia; however, some service providers may process limited personal information in other countries (for example, the United States, the United Kingdom, the European Union or Singapore). When this occurs, we take all reasonable steps to ensure those providers protect your information to standards comparable to the Australian Privacy Principles, including by using contractual safeguards.

Information handled by our cloud software providers is protected using industry-standard safeguards (including encryption in transit and at rest, access controls, auditing and secure deletion).

How we use your personal information?

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial plan;
- the provision of financial planning advice to you;
- making investment recommendations;
- reviewing your financial plan;
- reviewing investment recommendations.

We will not use or disclose personal information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the Australian Privacy Principles authorise use or disclosure as required by law and/or regulation or codes binding us, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body, including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

We are required under the Rules of Professional Conduct of the Financial Advice Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.
SWA Financial Planning may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

SWA Financial Planning may disclose your personal information to government agencies such as the Australian Taxation Office and Centrelink in order to assist you in keeping your legal disclosure obligations up to date.

SWA Financial Planning may use your personal information for the purpose of providing you with direct marketing material such as reports that may be of interest, however, you may, by contacting SWA Financial Planning by any of the methods detailed below, request not to receive such information and SWA Financial Planning will give effect to that request.

In order to ensure that you receive a personal and tailored service, your personal information will be available to all of SWA Financial Planning representatives. It is a condition of SWA Financial Planning agreement with each of its representatives that they adopt and adhere to this privacy policy.

In the event that SWA Financial Planning propose to sell its business it may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such 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. In the event of a sale of SWA Financial Planning, your personal information will be transferred to the purchaser of the business. You will be advised of any such transfer.

Access to and correction of personal information

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will endeavour to respond to any request for access within 30 days depending on the complexity of the

information and/or the request. If your request is urgent please indicate this clearly.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

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.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

We endeavour to keep your personal information accurate, up-to-date and complete. You can assist us with this by letting us know if you notice errors or discrepancies in information we hold about you and letting us know if your details change. If you consider any personal information we hold about you is inaccurate, out-of-date, incomplete, irrelevant or misleading you are entitled to request correction of the information. If after receiving a request from you, we agree that the information requires correcting, we will take all reasonable steps to correct your information.

Interacting anonymously

If you have general enquiry type questions, you can choose to submit these anonymously or use a pseudonym. However, we may not always be able to interact with you this way because we are governed by strict regulations that require us to know who we're dealing with. In general, we won't be able to deal with you anonymously or where you are using a pseudonym when:

- it is impracticable
- we are required or authorised by or under law, such as the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) or a court/tribunal order to deal with you personally.

TFNs, CRNs, and other government identifiers

We will not use your tax file number (TFN), customer reference number (CRN), or any other government agency identifier as your file, policy or application number. We only use and disclose these numbers for the purposes required by law, such as disclosing your TFN to the Australian Taxation Office.

You may use a government identifier, for example, a CRN or Medicare number, to prove your identity when you deal with us.

Authority for spouse to access information

If you would like each partner in your household to be able to access information on your combined portfolio, each member of a couple will need to sign a release authority that we will provide to you.

This authorisation will remain in place until revoked.

Therefore it is extremely important that you promptly notify us if there are any changes to your household circumstances, or if for any reason you wish to revoke the spouse authorisation.

Privacy complaint

If you wish to complain about any breach or potential breach of this Privacy Policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

They can be contacted at:

Office of the Australian Information Commissioner
Level 3, 175 Pitt Street
Sydney NSW 2000
Website: www.oaic.gov.au/privacy

SWA Financial Planning Privacy Officer Contact Details

Attention:	Privacy Officer
Street Address:	Level 3 3 Rawson Street Wollongong NSW 2500
Postal Address:	PO Box 815 Wollongong NSW 2520
Telephone:	02 4227 2122
e-mail:	clientservices@swafinancialplanning.com.au