

# Privacy | Policy

**When you trust us with your personal information, you expect us to protect it and keep it safe.**

We take this responsibility seriously and we are bound by the Privacy Act 1988 (Cth) ('Privacy Act'). We will protect your personal information in accordance with the Australian Privacy Principles and other applicable laws, such as the Spam Act 2007 (Cth) ('Privacy Laws'). These principles govern how we can collect, use, hold and disclose your personal information and ensure the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

## About this policy

This Privacy Policy explains how we use, disclose, manage your personal and sensitive information.

## What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information.

## What is sensitive information?

Personal information is sensitive information that includes information about your religion, racial or ethnic origin, political opinions, criminal record and sexual orientation. It also includes health information and biometric information. Therefore, any references in this policy to personal information may also include sensitive information.

The collection of sensitive information is restricted by the Privacy Act. Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

In addition, sensitive information may also be obtained in relation to hardship circumstances and or where we need to provide additional care to clients in vulnerable circumstances.

## What kinds of personal information do we collect and hold?

As part of building our relationship and understanding of you and your personal circumstances to provide you personalised advice, we need to collect personal information. The personal information we are likely to collect, and hold includes:

- Your name, address and contact details
- Your date of birth, gender and tax residency
- Details about members of your family and related entities
- Your occupation, employer, employer history and educational qualifications
- Any corporate or trustee relationships, where you are shareholder, beneficiary, settlor or controlling person under these entities.
- Your preferences or values in relation to financial products or strategies

- Government identifiers such as your tax file number, Centrelink identifier, director identification number, identification document numbers and photographs
- Details about your current and/or future financial circumstances, including assets, liabilities, income and expenses, bank details, goals and strategies, risk tolerance, insurance and estate planning arrangements
- Records of our discussions with your consent
- Your signature either in hard copy or digitally, and/or
- Identification information from any guarantor (or prospective guarantor) for credit and or power of attorney.

**The information that we seek to collect about you will depend on the products or services that we provide.**

When we communicate with you via telephone services (landline or mobile), in electronic format, email, through our electronic platforms, digitally or via social media platforms, we may keep records of your communication with us, acknowledgements, signatures (including digital), and cookies later explained in this policy.

Where we arrange finance or credit on your behalf, in addition we may ask for information about your finance needs, repayment or default history, borrowing capacity, council rate notices, contracts of sale and property insurance.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

**Tax file numbers**

Taxation laws generally prohibit the collection, use and disclosure of TFNs. However, an investment body may be informed of a TFN by a person acting on behalf of another person. SW Wealth may need to collect your TFN to administer and/or implement our recommendations in line with the information below. Upon completion of use, your TFN will be removed and or redacted from our records. An alternative is for you to provide your TFN directly to the relevant body.

Investment and superannuation bodies generally ask for your TFN, for the following reasons:

You are not required to provide us or any other body with your TFN and it is not an offence to choose not to do so. However, if you do not quote your TFN or exemption status to authorised bodies (as applicable):

- Your investment income and concessional super contributions may be taxed at the highest marginal rate plus Medicare levy.
- You may pay more tax on your super benefits than required (you may get a refund at the end of the financial year in your income tax assessment)
- Your super fund may be required to reject your personal after-tax contributions.
- It may be difficult to find and consolidate your superannuation accounts.

You may be exempt from the TFN quotation requirements and however you are generally required to quote your TFN exemption arrangements to the investment body: Typically, the following exemptions apply.

- Persons receiving a qualifying pension or benefit
- Children under the age of 16
- Entities not required to lodge income tax returns
- Non-residents

## Do I have to provide you my full information?

You have the right to remain anonymous and or not to provide us with any or all of your personal information. However, we specialise in providing personal financial advice and developing strategies that consider your personal circumstances, objectives and needs. Where we do not have the necessary information to ensure our advice is in your best interests, for example if it is inaccurate or incomplete, we may not be able to provide you with advice and or services and the advice may not be appropriate given you full needs and circumstances. Where you provide limited information, we will make you aware of any limitations or risks we can identify given any limited advice we may provide.

## Why do we collect, hold, use and disclose personal information?

We collect, use, hold, and disclose personal information to provide you with products and services. This includes:

- Checking or obtaining third party checks into whether you are eligible for the product or service
- Assisting you with online applications
- Providing the product or service
- Managing or improving the product or service we provide you, for example, invoicing or client surveys
- Assisting you with your questions, requests, feedback and or complaint
- Communicating with you, and
- Managing fraud and security risks (including using your mobile phone number and any other relevant identifier for two-factor authentication purposes).

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business.

We may also use your information to internally help us improve our advice and services with you. We leverage generative AI through Microsoft 365 Copilot to enhance research, data analytics, and workplace productivity to improve the delivery of our products, services, and programs. We may also use Filenote.AI, with your verbal consent for meeting transcription and internal file noting.

## How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product and/or service or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or if you send us electronic correspondence (see "Do we collect personal information electronically?").

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- Publicly available sources of information, such as public registers
- Your representatives (including your legal advisor, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney)
- Your employer
- Other organisations, who jointly with us, provide products or services to you
- Commercial information service providers, such as companies that provide fraud prevention reports

- Insurers, re-insurers and health care providers
- Banks, financial institutions, mortgage intermediaries, and other financial product providers, and
- Electronic sources, such as you visiting our website and or accessing our electronic platforms.
- Where you have given your consent.

## What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- Certain identification information about you as outlined in the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)
- Your Tax File Number, if you choose to provide it as specified in the Income Tax Assessment Act 1936 (Cth)

## How do we protect your personal information?

We have implemented security measures on all computers, programs and mobile devices accessing our IT systems and data backups. We have controlled access to our principal place of business, secure paper files, provide employee training and clauses in employee and contractor agreements regarding confidentiality and destroying and de-identifying data when it is no longer required or inadvertently provided by a third party.

Unfortunately, the transmission and storage of any data, including your personal information, over the internet or within cloud-based storage systems may not be completely secure. Whilst we will endeavour to protect your personal information, it is possible that third parties, outside our control, may be able to access, obtain or intercept transmissions or private communications without our knowledge or consent.

As a result, we cannot ensure the security of data, and any transmissions or electronic communications between us knowing this risk. Just as we take reasonable steps to secure all computing devices used in connection with our website, software, system and services, we recommend you do the same and ensure any internet accessible storage or portable devices, such as your mobile phone are secure.

If you have reason to believe that your interaction with us is no longer secure, for example, if you fear the security of any account, please change your passwords and contact us immediately.

## What is a Notifiable Data Breach?

The Privacy Act includes a Notifiable Data Breaches (NDB) scheme, which requires us to notify you and the Office of the Australian Information Commissioner (OAIC) of certain breaches likely to cause harm and recommend steps you can take to limit the impacts of a breach (for example, a password change).

If we believe there has been a data breach that impacts your personal information and creates a likely risk of serious harm, we will notify you and the OAIC as soon as practicable and keep in close contact with you about the nature of the breach, the steps we are taking and what you can do to reduce the impacts to your privacy.

## Who do we disclose your personal information to, and why?

We may provide personal information about our clients to organisations outside of SW Wealth and SW Australia. To protect personal information, we require our service providers comply with the Privacy Act. We only authorise our service providers to use or disclose your personal information for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- Our agents, contractors and external service providers (for example, mailing houses and technology (AI) service providers)
- Administrative and paraplanning service providers
- Insurers, re-insurers and health care providers
- Payment systems operators (for example, merchants receiving card payments)
- Other organisations, who jointly with us, provide products or services to you
- Financial services organisations, including banks, lenders, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers
- We receive services to support the credit broking services we provide you. We receive mortgage aggregation services from plan Australia
- Debt collectors
- Our representatives (including legal advisors, compliance advisors or auditors)
- Your representatives (including your legal advisor, accountant, mortgage broker, property valuer, guarantors, (including prospective) family members, executor, administrator, guardian, trustee, or attorney)
- IT and cyber and data security service providers
- External dispute resolution schemes, courts or tribunals
- Financial services, regulatory bodies, disciplinary panels, government agencies and law enforcement bodies in any jurisdiction.
- The trustee of your superannuation fund where this information is requested by them in order to satisfy their compliance requirements to deduct adviser service fees from my account.
- Other third party organisations, who jointly with us, provide products or services to you or with whom we partner to provide products or services to you. Information that we provide to third parties will be handled in accordance with their privacy policy, which is further detailed below. We use common cloud-based operating systems across our related entities to store client data. This means that some of the personal information we hold about you will be stored and visible to related entities on our shared customer databases. All personal information stored in these databases are subject to both this Privacy Policy and the Privacy Policies of our related entities. Our related entities are not authorised to use or disclose your personal information without your consent.
- Where you may have expressly consented to the disclosure, or the consent may be reasonably inferred from the circumstances
- Credit providers and credit reporting service companies
- When applying for credit, we may need to disclose your personal information and information about your application such as the type and amount of credit you're applying for, to a credit reporting body which could either be a consumer credit reporting service and/or a commercial credit reporting service. Where this is required from the credit provider, we will seek your consent.
- In the event of a sale, merger, restructure or similar event involving our business or assets, personal data may be part of the transferred assets.
- We are otherwise permitted to disclose the information under the Privacy Act.

## What should you know about credit providers and credit reporting bodies?

As part of providing our credit assistance services to you, we may undertake tasks for a credit provider which are required by them in the application process.

We may only, with your consent, when providing credit assistance

- Disclose your identification information to a consumer credit reporting service (“Consumer CRS”) and/or a commercial credit reporting service (“Commercial CRS”)
- Use any information a CRS provides in its report to assist us to preliminarily assess your credit or guarantor application (references to a “CRS” could be to either a Consumer CRS or a Commercial CRS)
- Disclose your information to an insurer or insurers to source any insurances you wish to obtain, and
- Disclose your information to our advisers, aggregators, licensees and other financial intermediaries, a credit provider or credit providers to apply for finance on your behalf.

The website of each credit provider contains details of each CRS with which it deals and other details about information held about you, including whether that information may be held or disclosed overseas and, if so, in which countries. The websites also describe your key rights. These details may be described on the credit providers’ websites as ‘privacy policy’, ‘credit reporting policy’ or ‘privacy disclosure statement and consent’, or similar.

For each Consumer CRS a credit provider uses, their website details will include the following specific information:

- What the CRS and the credit provider discloses about you to other credit providers to assess your credit worthiness
- If you become overdue in making consumer credit payments or commit a serious credit infringement, the credit provider may disclose that information to the CRS
- How you can obtain the credit provider’s and/or the CRS’s privacy policies.
- Your right to access and or correct your personal information records and to complain about conduct that may breach the privacy and credit reporting laws.
- Your right to request a CRS not to undertake pre-screening for purposes of direct marketing by a credit provider, and
- Your right to request a CRS not to release information about you if you believe you are a victim of fraud.

## The CRS business’s we generally use are Equifax, Experian, and or illion. Do we use cloud base services and disclose personal information overseas?

We may store your information in cloud or other types of networked or electronic systems. Electronic or networked systems can be accessed from various countries via an internet connection, so it’s not always practicable to know in which country your personal information may be held.

We may disclose your personal information overseas. We engage the services of these providers, who may be based both in Australia and or overseas. Some of these providers may have all or part of their operations overseas, store data overseas, access services overseas or utilise third parties who are overseas.

**We may use resources from an associated entity, Vitae International, based in India. This team are directly trained and managed by us. They assist our local team in the provision of administrative and para-planning services and this team have access to most of systems detailed below.**

SW Wealth maintains an Outsourcing Policy which governs the selection of service providers to ensure quality providers are selected and that their privacy policy aligns with our philosophy of protecting our clients’ privacy.

We provide a list below of our main third-party service providers, third-party applications or cloud base applications we may use, including links to their privacy policy and their data centre locations where available.

Third-party service providers, third-party applications or cloud base applications	Link
IRESS (Financial Planning) Customer Relationship Management, Portfolio Reporting and Financial Planning Software, and Cloud File Storage)	<a href="#">Privacy Policy</a> , <a href="#">Data Protection Policy</a>
Umlaut's Solutions , IRESS Practice Management Support	<a href="#">Privacy Policy</a>
Microsoft Cloud File Storage and Business Applications)	<a href="#">Privacy Statement</a> , <a href="#">Data Centre Locations</a>
DocuSign (Electronic Signature and Document Storage Application)	<a href="#">Privacy Policy</a> , <a href="#">Data Residency Information</a>
Morningstar (Portfolio Research Tool) and FinaMetrica (Risk Profiling and Analysis Tool)	<a href="#">Privacy Policy</a>
Scale Up Para-planning	<a href="#">Privacy Policy</a>
Loan Market Group (Mortgage Aggregator)	<a href="#">Privacy Policy</a>
QED Compliance Services (Credit)	<a href="#">Privacy Policy</a>
Filenote.ai	<a href="#">Privacy Policy</a>
One Click Verify	<a href="#">Privacy Policy</a>
Vitae International – Administration and paraplanning support	<a href="#">Privacy Policy</a>
<b>Credit Reporting Services</b>	
Equifax	<a href="#">Privacy Policy</a>
Experian	<a href="#">Privacy Policy</a>
illion	<a href="#">Privacy Policy</a>

Our understanding is that all providers have data encrypted at rest.

Overseas organisations may be required to disclose information we share with them under a foreign law.

## Do we use or disclose personal information for marketing?

We may use your personal information to offer you products and services we believe may interest you. We may send you direct marketing communications such as offers, updates, events, articles or newsletters. We will always give you the option of electing not to receive any of these communications in the future by notifying us or unsubscribing at any time.

## Do we collect personal information electronically?

### Cookies

We use cookies on our website. Cookies are small data files that are stored on your computer when you visit our website. Cookies are used to track which pages and what information is of most interest to visitors to our website, which in turn enables us to improve our offerings to our customers. Your computer's web browser will allow you to configure your computer to refuse to accept cookies. You can also delete cookies from your computer's hard drive at any time.

We won't ask you to supply personal information publicly over social media platforms that we use.

### Other technology

We may use technology such as beacons, tags, scripts and tracking pixels to collect, store and use data anonymously about how you use our website / mobile technology. This includes your IP address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data is used to increase functionality and can also enable us to display information and content that is tailored to our understanding of your interests. This information alone cannot be used to identify you.

## Can I gain access to and correct my personal information?

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee payable for updating or correcting your personal information. Should you request access to your personal information, a reasonable cost may apply. This cost may apply to the time it takes to locate, compile and supply the information to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give you access to or to correct your personal information, we will give you a notice explaining our reasons, except where it would be unreasonable to do so.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

## How long do we keep your personal information?

We will generally keep your personal information for as long as the laws require us to. Therefore, we will generally retain your personal information for at least seven years. This is a legal requirement that allows us to demonstrate we have complied with relevant financial service laws and respond to any questions or complaints.

We periodically review the information we no longer need and take steps to delete this.

## How we resolve your privacy concerns and make you aware of your rights?

If you are concerned about how your personal information is being handled or if you have a complaint about a breach of the Australian Privacy Principles, please contact us.

We are committed to resolving complaints within a fair and reasonable timeframe. Wherever possible, complaints will be resolved promptly at the first point of contact. Where this is not possible, we aim to resolve complaints within 30 calendar days as explained fully in our complaints policy can is also accessible from our website, [www.sw-au.com](http://www.sw-au.com)

If you are unhappy with our response, there are other bodies you can go to including the Australian Financial Complaints Authority and or the Office of the Australian Information Commissioner.

### Office of the Australian Information Commissioner

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information. The Commissioner can be contacted at:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

[www.oaic.gov.au](http://www.oaic.gov.au)

## Contact us

Our Privacy Officer can also be contacted in relation to privacy concerns by writing to:

Attention

### Privacy Officer

Level 10, 530 Collins Street

Melbourne, VIC 3000

You can also call or visit our offices in person:

**Phone** +61 3 8635 1800

**In-person** Level 10/530 Collins Street, Melbourne VIC 3000

## Links to other sites

Where our website may provide links to other sites for you to access, you should be aware that these other sites are not subject to this Privacy Policy or our privacy standards and our procedures. You will need to contact the owner of any links directly to ascertain their privacy standards.

## Changes to our Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy and we encourage you to review this policy periodically. While we seek to maintain the currency of the third-party links in this policy, third party privacy policies may change prior to our own review of our policy. We therefore encourage you to check any link is the most up to date privacy policy from any of our listed third-party providers. This Privacy Policy was last amended in April 2025.

## Providing us other information

Please make anyone in which you have provided their personal information to us aware of this Privacy Policy. If you provide us another person's sensitive information, ensure you seek their consent and make them aware of this policy. Where you have actively provided personal information about children under the age of 16, as their parent or guardian in this capacity, by providing us this information you have given your consent for us to hold this information. Where you provide any information in this regard in the absence of the other parent or guardian, please seek their consent and make them aware of this Privacy Policy.

## Client consent

By asking us to assist with your financial needs, you consent to the collection and use of your personal information you have provided us with for the purposes described in this policy.

We will request a separate and specific consent from you in our engagement statement in relation to the following:

- Using and or disclosing sensitive information as described in this Privacy Policy
- Disclosing your information to an oversea recipient for the purposes of work required to provide your services
- Obtaining your Tax File Number where you decide to provide it.

If you do not agree with the terms of this Privacy Policy, please do not use the website or otherwise provide us with your personal and or sensitive information.

## Meaning of words

**We, us or our** means:

ShineWing Australia Wealth ('SW Wealth') ABN 34 006 341 386, Australian Financial Services and Australian Credit License Number 236556.

Level 10, 530 Collins Street, Melbourne, VIC 3000 Australia

## Version

July 2025