Accountants & Advisors

Take the lead

ShineWing Australia Wealth Pty Ltd trading as SW Wealth

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 2003 (Cth) ('Privacy Laws'). These principles govern how we collect, use, hold and disclose your personal information, and help ensure the quality, security and appropriate handling 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, marital status, 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,
- Identification information from any attorney, authorised representative or other person you have authorised to act on your behalf and'
- any other information we may need to provide you with our services.

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.

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 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 TFN quotation requirements. However, where an exemption applies, you are generally required to notify the relevant investment body of your TFN exemption status. Typical exemptions include:

- 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?

Where lawful and practicable, you may deal with us anonymously or using a pseudonym, for example when making a general enquiry. In most cases this will not be practicable because we provide personal financial advice and are required to identify our clients, understand their circumstances and comply with legal and regulatory obligations. 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 your 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 complaints
- Direct marketing;
- Data analytics and statistical analysis;
- To notify you of other products, services, special offers or events;
- Communicating with you,
- Where you otherwise expressly consent to the use or disclosure;
- to assist SW Wealth in the running of its business; 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 and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

Use of Artificial Intelligence (AI) technology

We utilise artificial intelligence (AI) technologies within our business, including Microsoft Copilot and Microsoft Teams and FileNote.AI to support research, summarisation, document preparation, data analysis and workplace productivity and to record and transcribe meetings and calls with you.

These tools support our people and do not replace human review and decision-making in the delivery of advice or services to you, all advice is prepared and reviewed by qualified financial advisers.

All personal information processed through AI tools and the AI-driven processes we use comply with the Australian Privacy Principles (APPs) and our commitment to data security and the protection of your personal information. Should you wish to opt out of the use of AI-driven tools in your interactions with SW Wealth, such as automated meeting summaries and transcriptions, please contact us at data.notification@sw-au.com

If we in future arrange for computer programs to use personal information to make decisions, or do things substantially and directly related to decisions, that could reasonably be expected to significantly affect your rights or interests, we will update this policy to include the information required by law.

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 adviser, accountant, executor, administrator, guardian, trustee, attorney or other authorised representative
- 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 and other financial product providers relevant to the services we provide, 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)

To comply with anti-money laundering and counter-terrorism financing laws, we may collect identification, verification, beneficial ownership, source of funds or source of wealth information, sanctions and politically exposed person screening information, and related file notes where reasonably necessary. Where we collect copies of identification documents, we take reasonable steps to destroy or de-identify full copies once they are no longer required for our lawful purposes, and we retain only the information reasonably necessary to meet our record-keeping obligations.

How do we protect your personal information?

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. Consistent with APP 11.3, our steps include both technical and organisational measures appropriate to the sensitivity of the information we hold.

Our core client-facing systems are hosted in Australia and encrypted at rest. Some other service providers, such as Microsoft 365, Copilot, and DocuSign, may involve global infrastructure or overseas access and are managed through contractual, security, and governance controls.

While no data environment can be guaranteed to be completely secure, we monitor and respond to incidents in accordance with our incident and breach management processes and the Notifiable Data Breaches scheme. We also recommend that you take reasonable steps to secure the devices, accounts and internet services you use when communicating with us.

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 suspect an eligible data breach, we will assess it promptly and take all reasonable steps to complete that assessment within the timeframe required by law. If we determine that the breach is likely to result in serious harm, we will notify affected individuals and the OAIC as soon as practicable.

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 to 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, reinsurers 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
- Debt collectors
- Our representatives (including legal advisors, compliance advisors or auditors)
- Your representatives, including your legal adviser, accountant, executor, administrator, guardian, trustee, attorney or other authorised representative
- IT, cyber and data security service providers
- External dispute resolution schemes, courts or tribunals
- Financial services regulators, 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 your 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 is 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
- 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.

Do we use cloud-based services and disclose personal information overseas?

Most of our core service providers store SW Wealth client information in Australia and encrypt that information at rest. This includes the systems we use for financial planning, electronic identity verification, adviser forms and client portal services, risk profiling and meeting transcription where you have consented to transcription.

Some of our other service providers may store or process personal information outside Australia, or may allow limited overseas access. These include Microsoft 365 and Copilot, DocuSign and our associated administrative and paraplanning support team,

Overseas recipients are likely to be located in, or have infrastructure located in, one or more of the following: Australia, India, the United States, Ireland, the European Union and Singapore.

Before disclosing personal information to an overseas recipient, we take reasonable steps to ensure the recipient handles the information consistently with the Australian Privacy Principles.

Under section 16C of the Privacy Act, we remain accountable for how overseas recipients handle personal information we disclose to them. In some cases, overseas recipients may also be subject to foreign laws that could require disclosure of personal information to courts, law enforcement agencies or national security authorities.

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, including offers, updates, events, articles or newsletters. We will only send commercial electronic messages where we have consent or are otherwise permitted by law. Each commercial electronic message will identify us as the sender and include a clear and functional unsubscribe facility. We will action unsubscribe requests within five working days, the unsubscribe facility will remain operational for at least 30 days after the message is sent, and you will not be charged a fee to unsubscribe.

Do we collect personal information electronically?

Cookies

We use cookies on our website, by using our website, you consent to the use of cookies as outlined in this policy. 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.

To access or correct your personal information, or to make a privacy complaint, please contact our Privacy Officer by phone, post or email at data.notification@sw-au.com.

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 or unlawful to do so, including where disclosure would be inconsistent with legal obligations such as AML/CTF secrecy or tipping-off restrictions.

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 law requires us to retain it. Therefore, we will generally retain your personal information for at least seven years. This legal requirement allows us to demonstrate compliance with relevant financial services 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 aim to acknowledge complaints promptly and, where a complaint cannot be resolved immediately, to provide our response within 30 calendar days. If you are not satisfied with our response, you may be able to take your complaint to AFCA (for complaints connected with financial services – please refer to out Complaint Policy) and/or to the OAIC (for privacy related complaints).

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 | www.oaic.gov.au

Contact us

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

Privacy Officer

Attention: **Mr Duane Rogers**
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. These links are provided for your convenience, and their inclusion does not imply that we endorse or are affiliated with the third-party websites.

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 encourage you to review it periodically. While we seek to maintain the currency of the third-party links in this policy, third-party privacy policies may change before our own review of this policy. We therefore encourage you to check that any link is the most up-to-date privacy policy from the relevant third-party provider. This Privacy Policy was last amended in September 2026

Providing us other information

Please make anyone whose personal information you have provided to us aware of this Privacy Policy. If you provide us with 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, by providing us with 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 overseas 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 Pty Ltd ('SW Wealth') ACN 006 341 386, Australian Financial Services Licence Number 236556.

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

Version

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