



Last updated: 1 March 2019

This policy related to Perrier Ryan's collection and handling of personal information that is covered by the Privacy Act (Cth). It is not intended to cover categories of personal information not covered by the Privacy Act.

Privacy Policy

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

We are bound by the *Privacy Act 1988* (Cth) ('Privacy Act') and will protect your personal information in accordance with the *Australian Privacy Principles*. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring 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 manage your personal information. We may provide more details on how we manage your personal information when we collect your personal 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. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

What kinds of personal information do we collect and hold?

When you apply for our products or services we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. For example, if you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of 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.



The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information.

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 your Tax File Number in order to complete your tax return.

For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide you with products and services. This includes:

- checking whether you are eligible for the product or service;
- providing the product or service;
- assisting you where online applications are not completed; and
- helping manage the product or service

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 tell you about products or services we think may interest you.

How do we collect personal information?

We collect most personal information directly from you. For example, we will collect your personal information when you engage us to represent you, apply for or use a product 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, mortgage broker, insurance 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; and
- insurers, re-insurers and health care providers.



What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you by 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, by the *Income Tax Assessment Act 1936* (Cth); and
- certain information in relation to your application if you have applied for an insurance as required by the *Insurance Contracts Act 1984* (Cth).

How do we hold personal information?

Much of the information we hold about you will be stored electronically in secure servers located on our premises however some data is also contained on secure data centres which are owned or utilised by trusted external service providers – typically these servers are located in Australia. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with relevant requirements and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

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

We may provide personal information about our clients to organisations outside Perrier Ryan. To protect personal information, we engage with service providers whose privacy policies require them to comply with the Privacy Act where applicable. These engagements oblige them to only use the personal information we disclose to them 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 software service providers);
- 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, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;
- debt collectors;
- our legal advisers or auditors;
- your representatives (including your legal adviser, financial planner, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- IT Service Providers;
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside Perrier Ryan where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

In situations where we feel clients would benefit, we may share contact details amongst members of the Perrier Ryan group, meaning:

- Perrier Ryan Chartered Accountants (ABN 88 022 099 098)
- Perrier Ryan Financial Advisors (ABN 81 093 344 588)
- Perrier Ryan Financial Services (ABN 60 135 319 434)
- Perrier Ryan General Insurance Brokers (ABN 93 625 857 294)
- PRFP Pty Ltd (ABN 82 629 729 871)

Do we disclose personal information overseas?

Typically we have no reason to provide your personal information to a recipient which is located outside Australia however this may occur where:

- a service provider has international offices;
- you hold an account with overseas a financial institution and where you have given us permission to make enquiries on your behalf.

Do we use or disclose personal information for marketing?

We will use your personal information to provide you with information about products, services and general update items we believe may interest you, but we will not do so if you tell us not to. We may provide this information to you by various means, including by mail, telephone, email, SMS or other electronic means – which in future may include social media (e.g twitter).

Perrier Ryan does not currently disclose your personal information to companies as part of any marketing activities and there is currently no intention to do so. Should that situation change and you don't want to receive marketing offers from us please contact us at the time and we will update our records accordingly.



Do we collect personal information electronically?

We will collect information from you electronically, for instance through email correspondence with you and/or mobile or tablet applications during meetings with you. We offer access to a secure portal to electronically exchange information and documents – our preferred portal is the MYOB portal attached to our MYOB practice management software which is guaranteed secure by MYOB. MYOB advises that they use industry-standard internet security measures to protect the information.

An alternative portal is Secure Returns – also guaranteed secured by the provider (<https://www.securereturns.com.au>).

We currently don't actively use Facebook, Twitter or any other social media platform – but in the event that we commence operations in these spaces, we won't ask you to supply personal information publicly over those (or similar) platforms. Should we commence operations in social media, we may sometimes invite you to send your details to us via private messaging, for example, to answer a question. We do have a corporate LinkedIn page however that is for a presence only – no client information is collected.

Access to and correction of 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 for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it 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 correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

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 we will manage an actual or suspected data breach¹ under this policy

Perrier Ryan will manage the process of dealing with an actual or suspected breach in accordance with the *Data Breach Response Plan* which has been developed in accordance with OAIC Guidelines.

¹As defined by OAIC



Resolving your privacy concerns and complaints – your rights

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

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

The Australian Financial Complaints Authority (AFCA) can consider most privacy complaints involving providers of financial services.:

AFCA can be contacted at:

Australian Financial Complaints Authority Limited
GPO BOX 3
MELBOURNE VIC 3001
Phone: 1800 931 678
Email: info@afca.org.au
<https://www.afca.org.au/>

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner (OAIC) 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
<https://www.oaic.gov.au>

Contact us

You can contact us by:

- calling 07 3391 7566
- emailing contact@perrieryan.com.au
- visiting www.perrieryan.com.au
- writing to us at PO Box 1420, Coorparoo DC Qld 4151, Attention: Privacy Officer



Changes to the 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. An up-to-date version is available on www.perrierryan.com.au or by calling us on 07 3391 7566.

Meaning of words

We, us or **our** means:

Daniel James Perrier, Paul Joseph Ryan & Benedict Littleton trading as Perrier Ryan & Perrier Ryan Financial Advisors Pty Ltd, and their successors and assigns of Lvl1 30 Lisburn Street, East Brisbane Qld 4169 (“Perrier Ryan & its Associated Entities (Perrier Ryan Financial Advisors Pty Ltd, Perrier Ryan Financial Services Pty Ltd, Perrier Ryan General Insurance Brokers Pty Ltd)”)

Perrier Ryan means Perrier Ryan Chartered Accountants (ABN 88 022 099 098) and its related bodies corporate, including:

- Perrier Ryan Financial Advisors (ABN 81 093 344 588)
- Perrier Ryan Financial Services (ABN 60 135 319 434)
- Perrier Ryan General Insurance Brokers (ABN 93 625 857 294)
- PRFP Pty Ltd (ABN 82 629 729 871)