

twelve wealth



# Privacy Statement

For

**Twelve Wealth Management Pty Ltd ABN 56 607 403 627 (trading as  
Twelve Wealth)**

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Twelve Wealth Management Pty Ltd Twelve Wealth (Trading as Twelve Wealth) is committed to ensuring the confidentiality and security of your personal information. This Privacy Statement outlines how we manage the personal information we hold about you including:

- The types of information that we keep on record and how we use that information
- Your privacy rights and our general rights and obligations
- How we collect, maintain, use and disclose your personal information

## **Australian Privacy Principles**

Twelve Wealth maintains all personal information in accordance with the Australian Privacy Principles (APP) of the Privacy Amendment (Enhancing Privacy Protection) Act 2012. We are committed to being open with you about how we use your personal information.

## **Collection of Personal Information**

Twelve Wealth will only collect personal information from you where it is necessary to provide you with financial and advisory services. As a provider of financial services we are subject to legislative and regulatory requirements which require us to obtain and hold detailed information which personally identifies you and / or expresses an opinion about some or all aspects of your financial position. The type of personal information we may collect can include (but is not limited to):

- Name and address
- Date of birth
- Contact details
- Occupation and employment details
- Financial and personal goals and objectives
- Details of your current financial position including salary and other income, expenditure, assets and liabilities, risk protection, superannuation and other investments.
- Details of your risk preferences
- Details of your health
- Details of your social security eligibility
- Details of your estate planning requirements

Twelve Wealth is also required under the Anti-Money Laundering and Counter-Financing Act (AML/CTF Act) to verify your identity. We may do this by taking a copy of your driver's licence and/or passport or other identification documentation.

## **Sensitive Information**

We do not actively seek to collect sensitive information unless it is necessary for our business purposes, such as, it may be needed for applications for personal insurance and to manage claims on those products. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

Where reasonable and practicable we will only obtain information directly from you. This may be through face to face meetings, telephone correspondence, electronic means, data collection forms, and from maintaining records of information provided in the course of ongoing financial services. Sometimes we act as an intermediary for others when collecting information about you such as for the purpose of assisting you to apply for insurance. With your prior approval, we may also contact external providers to confirm specifics of certain products or other details.

Where we collect information from you about another individual, for example your nominated beneficiaries or a person you decide to refer to us, it is your responsibility to inform them of your disclosure and please make that individual aware of the contents of this Privacy statement. They will need to contact us if they do not wish us to maintain their personal information.

If you choose not to provide the information we need we may not be able to provide you with the financial services requested.

## **Use and Disclosure of Collected Information**

The personal information we hold will be used for the provision of financial and advisory services to you. In some instances it may be necessary for us to disclose your personal information to certain third parties. Unless you consent to this disclosure we will not be able to provide you with financial and advisory services. The types of organisations to whom we may disclose your personal information include:

- Financial institutions for the provision of financial products such as investments, superannuation, and life insurance;
- Organisations undertaking compliance reviews of our financial advisers or reviews of the accuracy and completeness of our information;
- Organisations providing mailing services, maintenance of information technology services and printing standard documents and correspondence;
- Organisations providing research, technical (tax, legal, etc) and / or paraplanning services;
- Employees of your adviser or your adviser's business;
- Organisations we may contract with to provide us with a service (such as software providers);
- To any party acquiring an interest in our business;
- Where the Law requires or permits us to do so.

Further we may use your personal contact details to send you information from time to time that we think will be of interest to you. However you may instruct us not to send this information to you by contacting us either by phone or in writing.

## **Data Quality**

It is our aim to ensure the information we hold about you is accurate, complete and up to date. Part of our services to you may include an annual review of your circumstances. At this annual review we will ask for your confirmation as to the accuracy of the information we hold. If you believe at any stage the information we hold is inaccurate or incomplete in any way, please contact us and provide evidence of the inaccuracy. If the information we hold is wrong we will correct it.

## **Accessing Collected Information**

If you wish to access the personal information we hold about you please contact us.

Twelve Wealth will always ask you to identify yourself to our satisfaction and provide us with a reason for requesting the information. We will facilitate access to the information by discussing with you how you would like to receive access to the information and what manner would be most appropriate. You may ask us to correct any information we have to your satisfaction.

## **Data Security**

The security of your personal information is important to us. Your personal information is held in a combination of secure computer based storage facilities and lockable filing cabinets or in a secure filing room. We will at all times ensure your personal information held by us is protected from misuse and loss, and from unauthorised access, modification or disclosure.

We are required by law to keep your personal information for a certain period of time. When we no longer require the information for any purpose we will destroy by secure means or permanently de-identify the information.

## **Identifiers**

We will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers, Medicare Numbers etc.

## **Anonymity**

The nature of our financial services does not lend itself to treating clients with anonymity. For us to provide you with a financial service we require personal information about the individual for whom the service is provided.

## **Transborder Data Flows**

Twelve Wealth will not send any personal information about you overseas unless Twelve Wealth reasonably believes that the other country has privacy laws substantially similar to our own, or Twelve Wealth provides the information in other circumstances giving like protection.

## **Cookies**

When you visit our website, details may be recorded about your visit, such as time and date, server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

We may use cookies to identify your browser so that next time you visit our website we remember your log in details. A cookie is a small file which remains on your computer and contains information enabling Twelve Wealth' website to recognise your browser. If you do not wish to permit the use of cookies, you can adjust the settings on your browser to reject cookies or notify you when they are being used.

## **Links to Third Party Websites**

Our website may have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by our Privacy Statement and these websites are not subject to our privacy standards and procedures.

## **Queries and Complaints**

If you require further information about our Privacy Policy or wish to make a complaint about possible breaches of your privacy, you should contact your Adviser. Alternatively you may wish to put your query in writing and forward it to our Office.

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 Privacy Commissioner who may investigate the complaint further.

## **Review**

From time to time it may be necessary for Twelve Wealth to review this statement. Twelve Wealth reserves the right to change this Privacy Statement at any time without notification.