

## Privacy Policy

Mosaic Wealth Advisers Pty Ltd ('Mosaic Wealth Advisers') is committed to ensuring the confidentiality of your personal information in accordance with the Privacy Act 1988 and the Australian Privacy Principles (APPs).

### 1 Why we collect information

We collect information for a number of reasons including:

- preparation and provision of initial financial advice;
- preparation and provision of ongoing financial advice;
- placement of financial products including purchase, variation, or redemption of investments;
- provision of a financial service, such as actioning share buy/sell instructions;
- provision of a financial service, such as purchase, variation, or cancellation of insurance products;
- set up and administration of a Self-Managed Super Fund (SMSF);
- providing assistance with ancillary services such as Centrelink;
- providing assistance with the coordination of other providers or experts such as solicitors, accountants etc.;
- providing specialist business advice and support;
- providing assistance and support in sourcing, buying, selling, and managing, investments and insurances;
- providing estate planning advice and support.

As well as providing us with information upon which to provide a customised solution to your needs and objectives, we are required under the Corporations Act 2001 (Cth) and:

- To fulfil our regulatory and legislative requirements.

### 2 How we collect this information

- When we ascertain from you the facts necessary to make a fair and reasonable assessment of their insurance or financial needs and objectives ("via a Fact Find process");
- When you complete an application form for insurance;
- When you complete an application form for an insurance claim;
- When you complete an application form for investments;
- When you complete an application form for superannuation
- When you complete an application form to increase their level of insurance; or
- When you complete supplementary medical or financial questionnaires.

If you are unable to provide us with your personal information, we may not be able to organise for you to receive our service or a product you may need. You can nominate an Authorised Representative to access your personal information. And yes this authority can be revoked at any time.

Mosaic Wealth Advisers' may collect personal information from a third party (such as another Financial Adviser, Product Provider, Accountant, Lawyer or Medical Practitioner) or a publicly available source but only if you have consented to the collection or it can reasonably be expected that consent has been provided by you.

## 2.1 Privacy on the internet

Mosaic Wealth Advisers' and our Authorised Representatives may use websites to collect personal information from or for you. Mosaic Wealth Advisers' and Authorised Representatives may receive a password and a personal identification number to access details online. This information will be kept confidential and secure at all times.

### 2.1.1 Cookies

These are text files stored on a person's computer when they visit a website. Their sole purpose is to identify users and possibly prepare customised web pages or to save site login information. Mosaic Wealth Advisers' and our Authorised Representatives may use cookies on our websites. Cookies can be purged from your browser after every use. This is generally a very simple procedure. Please refer to your browser's help file for more information.

Although Mosaic Wealth Advisers' and our Authorised Representatives strive to ensure your security, no data transmission over the internet can be guaranteed to be completely secure.

### 2.1.2 Links to third party websites

Mosaic Wealth Advisers' and our Authorised Representatives may provide links on our web pages to external industry parties. The content and views expressed on these third-party websites are not the responsibility of Mosaic Wealth Advisers' or our Authorised Representatives.

## 2.2 Government Related Identifiers (example: Tax File Numbers-TFN's)

We will not adopt as our own any identifiers that you may provide to us such as TFNs, Centrelink, Medicare numbers etc. If you have provided us signed consent, we may hold your identifiers on file so that we can provide ongoing services to you. If you chose not to provide this consent, we will not hold this information on file. The circumstances in which an organisation may use or disclose government related identifiers are narrower in scope than the circumstances in which an organisation may use or disclose other personal information. Government related identifiers will not be disclosed except in the following circumstances:

- where use or disclosure is reasonably necessary for the organisation to verify the identity of the individual for the purposes of the organisation's activities or functions;
- to verify that an individual is who or what they claim to be, for example, to verify their name or age;
- to fulfil our obligations to an agency or a State or Territory authority;
- as required or authorised by or under an Australian law or a court/tribunal order;
- where use or disclosure may lessen or prevent a serious threat to life, health, or safety;
- when taking appropriate action in relation to suspected unlawful activity or serious misconduct;
- when disclosure of a government related identifier to an enforcement body is requested for enforcement related activities; and
- as prescribed by regulations.

### 3 What we collect

The personal information generally collected includes:

- Name, Address, Phone number, Email address, Age details, Occupation, Financial details, Health Details, Transaction information, Bank account details, Tax File Number, Income details from employers, Details of dependents, Beneficiary details.

This list is not exhaustive but a good example of the information we will collect. Where the information is deemed to be sensitive, for example, the collection of health information, there will be higher level of privacy protection afforded.

### 4 Disclosure of personal information

There may be cases where Mosaic Wealth Advisers' and our Authorised Representatives will need to disclose your personal information to third parties. This is generally to assist us in providing you with a product or service. This may include:

- Doctors, medical services or other organisation to help assist with the collection of information for an insurance application or a claim;
- Any fund (investment administrator or superannuation trustee) to which your benefit is transferred, created or rolled over;
- Your employer where it relates to your employer sponsored superannuation arrangement;
- Your personal representative or any other person who may be entitled to receive your death benefit;
- An external dispute resolution service, insurer or legal representative (where required by law or applicable);
- The policy owner (where you are the life insurer but not the owner);
- Exchange of information with authorised financial institutions to confirm bank account details for payment;
- Service providers that maintain, review and develop our business systems;
- Regulatory bodies (including the Australian Securities and Investment Commission) as required by law.

If required by law or a regulatory body to do so, Mosaic Wealth Advisers' and our Authorised Representatives will comply and provide the appropriate body with the required information.

#### 4.1 How we hold personal information

Your hard copy and electronic records are stored in secure buildings and internal information systems.

##### 4.1.1 Protecting personal information

We protect your information by way of staff training, secure storage and system security. Mosaic Wealth Advisers' will take reasonable steps to destroy or de-identify the personal information we hold once it is no longer needed for any purpose for which it may be used or disclosed.

### 5 Collection of sensitive information

Where you apply for certain life risk products (such as life insurance, income protection insurance, trauma insurance, total and permanent disability insurance) it will be necessary for Mosaic Wealth Advisers' and our Authorised Representatives to

collect sensitive information about your health. This information will only be collected when you give consent by completing the product's application form. The information will be sourced by the Life Insurance company from you, your medical professional and by other medical professionals where medical tests may have been performed. Due to confidentiality, it is sometimes the case whereby Mosaic Wealth Advisers' or the Authorised Representative may not be made fully aware of the medical circumstances by the Life Insurance Company. Unless required by law, we will only collect sensitive information with your consent.

## 6 Where we operate

Mosaic Wealth Advisers operates only in Australia and predominantly in Queensland, but we do have a number interstate clients.

### 6.1 Marketing

We may use personal information collected from you for the purpose of providing you with direct marketing material; however, if you do not wish to receive such information you can request not to receive it. Simply contact us by any of the methods detailed in this document. There is no cost for this request, however, please allow two weeks for your request to be actioned. Infocus adheres to the Spam Act 2003 (Cth), accordingly, we will:

- obtain your consent before sending an electronic message to you (this can be express or inferred);
- provide sender identification (so that you know who sent the message); and
- provide you with the option to unsubscribe.

## 7 Sending personal information overseas

If we send your personal information to overseas recipients, will ensure that appropriate data handling and security measures are in place.

Authorised Representatives of Mosaic Wealth Advisers' may enter their own outsourcing arrangements and send your information to countries other than those listed above. Those arrangements will be disclosed to you separately by your financial adviser.

### 7.1 Anonymity and pseudonymity

You may remain anonymous or use a pseudonym when dealing with us. However, it may not be possible for us to assist you with your request if you wish to use a pseudonym or remain anonymous.

### 7.2 What happens if I do not provide information that has been requested?

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud. Where you are seeking financial advice, it may also affect our ability to properly analyse your personal circumstances

## 8 Sale of an Authorised Representative's business

In the event that an Authorised Representative proposes to sell their business, or if an Authorised Representative is no longer eligible to provide advice, we may disclose some of your personal and sensitive information to potential purchasers for

the purpose of conducting due diligence investigations. Any such disclosures will be made in the strictest confidence and conditional that no personal information will be used or disclosed by them. In the event of a sale being affected, Mosaic Wealth Advisers' or our Authorised Representatives may transfer your personal information to the purchaser of the business. In this instance, you will be provided a notice by mail to your last known mailing address that such a transfer will be taking place. You will then have the opportunity to object to the transfer within 14 days of the date of the notice.

## 9 Access to personal information

You are able to access any personal information that is held by Mosaic Wealth Advisers' or our Authorised Representatives subject to limited exceptions or as required by law. The following factors will be considered:

- The information is related to a commercially sensitive decision-making process.
- Access would be unlawful.
- Denying access is required or authorised by or under law.
- Providing access would be likely to prejudice an investigation of possible unlawful activity.

To access the information, you will need to contact the Privacy Officer as detailed in this policy.

You may be charged a small fee applicable to the collection and provision of your personal information but will be notified of this fee prior to processing their request. The Mosaic Wealth Advisers' Privacy Officer will be able to advise you how long it will take to provide the information. Generally however, you will receive the requested information within 14 days of the request.

If you believe that the personal information we hold about you is incorrect, you have a right to request your personal information be corrected.

Where we are unable to provide you with the information you have requested or correct your information, we will inform you and explain the reasons why.

## 10 Privacy Officer

Mosaic Wealth Advisers' has nominated a Privacy Officer to handle any queries or issues related to Privacy.

Name: Adrian Judd

Phone: 0424 667 242

Email: [advice@mosaicwealthadvisers.com.au](mailto:advice@mosaicwealthadvisers.com.au)

Post: PO Box 426

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We do take your privacy seriously and any complaints you may have will be addressed through our complaints handling process. All complaints will be given fair consideration and we will aim to resolve them within 45 days. We encourage you to submit your complaint to the Privacy Officer (details above) either via email or post. Where it is found that we are unable to finalise the investigation of your complaint within 45 days, we will contact you to request an extension.

If you believe you did not receive a satisfactory resolution to your concern, you may contact the Office of the Australian Information Commissioner. You are able to do so by:

- Visiting [www.oaic.gov.au](http://www.oaic.gov.au) and submitting an online form;
- Obtaining a hard copy form at [www.oaic.gov.au/about-us/contact-us-page](http://www.oaic.gov.au/about-us/contact-us-page);

- Phone: 1300 363 992;
- Fax: 02 9284 9666;
- Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

The Office of the Australian Information Commissioner is also available via Social Media outlets. Please refer to the Contact Us page at [www.oaic.gov.au/about-us/contact-us-page](http://www.oaic.gov.au/about-us/contact-us-page).

Or directly to:

The Privacy Commissioner

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: [privacy@privacy.gov.au](mailto:privacy@privacy.gov.au)