



Financial Services Guide

Version 10.1
Date: 13 July 2017

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ready
responsible**



The documents you will receive from us

Financial Services Guide

This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you
- how we and our associates are paid and any other benefits we may receive
- any potential conflicts of interest we may have
- how we protect your privacy and handle your personal information
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us.

Other documents you may receive

In addition to this FSG, when we provide you financial advice we will also present you with a written Statement of Advice (SOA).

This will describe the strategies, products and services we recommend and outline any fees or commissions we will receive and any associations we have with financial product providers or other parties that have not already been disclosed in this FSG.

If you receive further financial advice from us, we will present you with either another SOA or keep our own written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the "Contact us" section of this FSG for our contact details.

We will also provide you with a Product Disclosure Statement (PDS) or offer document for all financial products we recommend, where applicable. This will outline the product in detail to help you make an informed decision about whether it is right for you.

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the "Contact us" section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (eg fax, email or letter) or another method agreed with us.

About our Licensee

We are authorised representatives of GWM Adviser Services Limited ABN 96 002 071 749, Australian Financial Services Licence Number 230692 ("GWM Adviser Services") of Level 1, 105-153 Miller Street, North Sydney NSW 2060.

GWM Adviser Services is recognised as one of Australia's leading financial advice networks, with over 450 experienced financial planners across Australia managing over \$14 billion of investments.

GWM Adviser Services is a professional partner of the Financial Planning Association, the professional body representing qualified financial planners in Australia, and therefore adheres to set standards in terms of ethics, conduct and continuing professional development.

Our associations and relationships

GWM Adviser Services is part of the National Australia Bank Limited ("NAB") group of companies ("NAB Group"). GWM Adviser Services is a wholly owned subsidiary within the NAB Group. NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by GWM Adviser Services or its authorised representatives.

We may recommend financial products issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group member (including MLC Limited).

These include products and services with the following branding:

- NAB, National
- MLC
- Fairview Equity Partners
- JANA Investment Advisers
- Antares Capital
- Pengana Capital
- Altrinsic Global Advisers
- Plum or Plum Super
- JB Were Wealth Management
- Redpoint Investment Management
- Threesixty Research
- Northward Capital
- Presima Inc

If we recommend a product or service issued by a NAB Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on GWM Adviser Services' approved product list. In some categories, these may be all NAB Group products. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances, then we may recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests.

GWM Adviser Services maintains a relationship with the following insurance providers (AIA, Zurich, Colonial First State, One Path and Macquarie) which pay GWM Adviser Services a licensee commission payment as described in the 'Commissions received by our Licensee from product providers' section of this FSG.

NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC

Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.

MLC Limited will pay National Wealth Management Services Limited, a related body corporate of NAB, a distribution allowance as described in the 'Distribution Allowance' section of this FSG. If appropriate to your requirements, objectives and circumstances then a GWM Adviser Services adviser may recommend a risk insurance policy issued by one of these insurers, or an insurance policy issued by MLC Limited.



About us

Who we are

Nexus Wealth Management Pty Ltd is a 100% locally owned and operated financial planning practice.

Nexus Wealth Management has built an extensive and diverse client base by providing services to all businesses and individuals at any stage of their financial journey. Whilst we specialise in providing services to Small and Medium businesses, we also cater to your personal financial planning needs.

In order to provide a complete service offering to our clients, we partner with a number of other professionals such as accountants, lawyers and tax specialists that are likewise committed to securing the best outcomes for our clients. With offices in Perth, we are well placed to provide knowledgeable, professional and innovative financial planning advice to clients across Western Australia.

The Financial Services we offer are provided by Nexus Wealth Management Pty Ltd ACN 104 155 384 ATF The Trustee for Nexus Wealth Management Trust ABN 41 328 119 534 trading as Nexus Wealth Management, Suite 4, 7 Lyall Street, South Perth WA 6151. Authorised Representative No. 245 448

The following financial advisers are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you on behalf of GWM Adviser Services:

Brian Woods
Authorised Representative No. 242 579
Credit Representative No. 370444

Peter Campbell
Authorised Representative No. 123 3303
Credit Representative No. 475265

GWM Adviser Services Limited has authorised us to provide you with this Financial Services Guide.

What we do

We are authorised by GWM Adviser Services to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide financial advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Facilities
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Superannuation
- Retirement Savings Accounts
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Derivatives
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

Where we are unauthorised to provide you with a financial service or financial product that you are interested in, we will advise you of this and refer you to an alternative source of advice.

Contact us

For more information on anything you have read in this FSG, to obtain a copy of our privacy policy or if there is anything else we can help you with, please contact us at:

Address - Suite 4, 7 Lyall Street, South Perth, WA 6151
Phone - 08 9208 1333
Email - brian@nexuswealth.com.au
peter@nexuswealth.com.au
Website - www.nexuswealth.com.au

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The Advice Process

We understand this. In order to identify, construct and deliver high level advice, we continue to work with you to ensure that our advice is maintained over time and continues to meet your business and personal financial objectives.

Our advice covers 4 major stages where we confirm actions and ensure accountability from all parties, resulting in the best outcomes for our clients



Discovery

At Nexus we lead clients through a Discovery process that ensures any advice given, is tailor-made. The process is comprehensive, addressing all aspects of our client's financial well-being. We ask the right questions relating to what is most important to you, gain an in-depth understanding of your goals and your current financial situation. We ensure that we can add value prior to offering any valuable advice

Strategies

Nexus designs and develops a strategy, whilst working with our strategic alliance network, to maximise your chances of achieving your goals. We then provide you with a fixed cost proposal outlining the strategies, services and time line for delivery

Solutions

Upon acceptance of the proposal, you are provided with your complete in-depth strategy plan. It is key that you have a complete understanding of the recommendations. We work with you to successfully implement all of our recommendations and conduct review meetings to go over the changes. For ongoing services, we provide you with a 12-month fixed cost service agreement outlining the services and time line for delivery

Action

Regular meetings and contact points are conducted to ensure you are maximising your outcomes. We discuss the advice and strategy that is still relative and further identify any new goals as original outcomes are achieved. Any changes are agreed upon in an updated action plan

Advice Map



Integral to the successful implementation of our advice is the Nexus Wealth Management Advice Map. This map outlines the different contact points of our advice, where we confirm actions and accountability and this enables clients to easily establish the progress of their advice.

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Services Offered

Nexus is a specialist in providing strategic solutions to Small Medium Enterprises (SME's) and their owners. The services we offer are, Business Advice Committees, Business Risk Management, Business Succession, Employer of Choice Packages and Personal Financial Planning Services.

These specialty areas are significant to improving the structure, security, and performance of SME's and ultimately the financial success of their owners.

Our advisers have extensive experience in consulting to businesses and their owners and are well positioned to partner with you in finding a best fit solution that will help you achieve your goals.

Nexus works in conjunction with a strategic alliance network and is able to manage the entire process ensuring a professional and highly effective result.

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Privacy Notification

How we manage your personal information

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification covers us and tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy, please ask us.

If you would like more information about our Licensee GWM Adviser Services (and other members of the NAB Group), please also refer to the National Australia Bank Privacy Policy available at www.nab.com.au/privacy).

Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant. We do this only if it's necessary to do so, for example where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us;
- at your request, we exchange information with your legal or financial advisers or other representatives.

You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

What happens if you don't provide your information to us?

If you don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which we use your information. This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including GWM Adviser Services and other members of the NAB Group, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee GWM Adviser Services and other members of the NAB Group;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities)
- where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers). You can view a list of the countries in which those overseas organisations are located in our Privacy Policy.

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Sharing with MLC Limited

NAB distributes MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information with MLC Limited so as to ensure:

- your insurance premiums are correctly calculated;
- insurance claims and benefits are paid;
- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products);

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to NAB's privacy policy as well as NAB Group's security procedures and controls.

Consent to marketing activity

We presume you consent to being contacted by us (including GWM Adviser Services and other members of the NAB Group) about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the 'Contact us' section of this FSG). We will process your request as soon as practicable.

Gaining access to your personal information

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

Correcting your Information

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal these complaints, by reading our Privacy Policy (by contacting us) or by referring to the 'Your confidence in our advice' section of this FSG.

Further information

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the 'Contact us' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at www.oaic.gov.au

Your confidence in our advice

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.
2. If your adviser has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:

Phone: 1800 611 950

Email: advice_complaints@mlc.com.au

In writing to:

Advice Dispute Resolution Team
GWM Adviser Services
Level 2, 105-153 Miller Street
North Sydney NSW 2059

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Financial Ombudsman Service (FOS), an independent complaint handling body. We are a member of FOS. FOS provides a free, accessible, fair and independent dispute resolution service to consumers. You can contact FOS on:

Phone: 1800 367 287,

Email: info@fos.org.au

Website: fos.org.au

In writing to:

The Manager
Financial Ombudsman Service
GPO Box 3
Melbourne VIC 3001

GWM Adviser Services holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our advisers who were authorised by GWM Adviser Services at the time of providing the advice, but are no longer authorised representatives of GWM Adviser Services at the time of your complaint.



How you can pay for our services

You can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based upon:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- by direct invoice from us for initial and ongoing advice;
- via commission we may receive from a financial product provider when you commence an insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time.

Other payments we may receive

We will provide you with details of all fees, commissions or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

Conferences

We may attend conferences and professional development seminars that have a genuine education or training purpose. GWM Adviser Services Limited, or our employer, may pay for the costs of our travel and accommodation, and events and functions held in conjunction with the conference or seminar.

Non-monetary benefits

We keep a register detailing certain non-monetary benefits that we receive e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting us. Please be aware that GWM Adviser Services Limited may charge you for the cost of providing this information to you.

Commissions received by our Licensee from product providers

GWM Adviser Services has ongoing commission arrangements with a number of risk insurance providers. Where you acquire a risk insurance policy issued by AIA, Zurich, Colonial First State One Path and Macquarie the insurer may pay GWM Adviser Services a commission payment which based on total in-force premium and lapse rates for risk insurance policies recommended by all advisers within GWM Adviser Services adviser network. The payments received by GWM Adviser Services may be up to 2% of the premium amounts paid by policy holders to the relevant insurer. As this amount is calculated in the future, we cannot provide an exact amount at this time; however, as an example, if as a result of services provided to you by GWM Adviser Services, a participating insurance provider receives \$5,000 in premium, then GWM Adviser Services will receive up to \$100 as a commission (2% of the premiums held).

The above payments are not shared with your adviser. These payments do not represent an additional charge to you and your adviser will disclose in your Statement of Advice insurance products for which these arrangements may apply.

Distribution Allowance

MLC Limited pays a distribution allowance to National Wealth Management Services Limited, a related body corporate of NAB, in respect of the distribution of MLC Limited's insurance products by licensees in the NAB Group (including NAB). This amount is not ascertainable at this time and will depend in part on the value of MLC Limited's insurance portfolio relating to insurance distributed through NAB and its related bodies corporate and the performance of NAB and its related bodies corporate against agreed annual performance criteria.

This allowance is not shared with your adviser and does not represent an additional charge to you.

Referrals

If you have been referred to us or we refer you to someone else, we may have arrangements in place to or receive a referral fee, commission, or other benefit.

Details of any arrangement will be provided in our advice to you.

Business Equity Valuation (BEV)

In the event of our death or permanent disablement, or if we were to leave the financial planning industry, GWM Adviser Services Limited provides a buyer of last resort option called BEV. This helps manage the transition of ownership to ensure you continue to receive advice.

In addition, we are part of a corporate structure and have a succession agreement in place to manage the transition of ownership should we leave the business.

Our business operates in a corporate structure. This model is less likely to be eligible for BEV as all the Principal Advisers in our business would have to either leave the industry, die, or become permanently disabled.

The value of a sale under BEV is based on a multiple of ongoing revenue received by the business on an annual basis. The multiple can range from 2.5 to 4 depending on the proportion of the ongoing revenue that comes from clients who hold MLC group financial products.

Here are some examples to help you understand the potential benefit to us of our clients holding MLC group product:

- If the ongoing revenue of the business was \$100,000 and 50% of our clients held MLC group products, the sale value for the financial planning business would be between \$250,000 and \$350,000;
- If the ongoing revenue of the business was \$100,000 and 85% of our clients held MLC group products, the sale value for the financial planning business would be up to \$400,000;

Importantly, BEV is subject to us meeting certain compliance requirements and standards.



How we charge for our services

All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

Initial consultation	At our expense / Free of charge.
Strategy Presentation (if applicable)	We will produce a comprehensive Proposal detailing all fees for your agreement prior to proceeding any further
Advice preparation	<p>If you elect to pay us a fee for advice and strategy the following fees will apply. The fees will depend on the complexity of the advice and strategy (not your investments or risk):</p> <p>Engagement Fee: \$0 - \$17,500 Advice and Strategy Fee: \$0 - \$25,000 Implementation: \$0 - \$15,000 Ongoing Monitoring and Review: \$0 - \$45,000</p> <p>For example, complex advice that contain multiple goals, with multiple goals, strategies and/or tax structures including but not limited to; self-managed superannuation Funds, family trusts and companies, are likely to be charged closer to the maximum. Less complex advice that addresses limited goals, strategies and tax structures are likely to be charged closer to the minimum.</p> <p>We may occasionally receive a product commission payment in lieu of charging you an Advice Fee. This may occur where we have advised on Risk Insurance or Debt products. It does not apply on Investment Products. These details will be fully disclosed to you.</p> <p>You may choose to pay our fees directly (via invoice and payable by cheque, credit card or direct debit) or have our professional costs paid to us via the product provider from the investment products we've recommended to you</p>
Implementation (fee for advice)	Generally, Implementation fees are included in our Advice and Strategy fees. Should we charge an additional fee for Implementation of our advice and strategy, you will be fully informed and agree to this additional cost prior to proceeding any further.
Ongoing fee for advice	<p>The ongoing advice fee will be based on the level of service needed and the complexity of the advice. Complex advice requirements include the use of trusts and ownership structures, overseas assets or incomes, executive options or multiple investment entities. The frequency of the review will also impact on the fee charged.</p> <p>For Personal strategy clients, the ongoing review fees will range from \$3,600 to \$25,000 pa plus GST. For Business strategy clients, the ongoing review fees will range from \$5,000 to \$50,000 pa plus GST.</p> <p>The ongoing service fee may be collected monthly through the product issuer or invoiced and paid directly by you via credit card, direct debit or cheque.</p> <p>For new clients, you can elect to pay this fee via your Product Provider, no % fees.</p> <p>We may receive ongoing commission (as detailed below) for any life insurance products you have in lieu of or in addition to this fee.</p> <p>Borrowed funds – if we recommend you acquire investments using borrowed funds then your ongoing fee will be a minimum of \$330 and a maximum of \$10,000 pa.</p>

Ad hoc advice	<p>Where you do not wish to participate in an ongoing service fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of between \$165 and \$550 may apply.</p> <p>Hourly rate: \$165 per hour for Support Staff \$330 per hour for Associate Advisor \$440 per hour for Financial Planner \$550 per hour Senior Financial Planner/Strategic Adviser</p> <p>Please note: If our advice is for an insurance application and the insurance is declined, or you wish to cancel the application, or it does not proceed for any other reason, Nexus Wealth Management will invoice you for the time spent in completing the file until the date the insurance process ceased and you will be obliged to pay any costs incurred until that time. Fees will be charged as per the Hourly rates shown above.</p>
Execution only service	<p>Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off minimum of \$165 and a maximum of \$550 fee may apply.</p>
Stamping Fees	<p>Where we receive stamping fees from issuer companies for raising capital or debt on behalf of that company, we will offset this payment against the cost of our advice to you.</p>
Insurance products	<p>The relevant insurer will pay initial commission between 0% and 130% and ongoing commission between 0% and 33% of the annual premium for as long as you hold the product. Commissions are paid to us by the product provider and are not an additional cost to you.</p>
Pre-existing arrangements	<p>For existing clients, already in an established commission arrangement, we may receive commission on investment products or margin lending products held. For investment products the relevant product issuer will pay initial commission between 0% and 5.5% and ongoing commission between 0% and 0.88% of the value of your investments for as long as you hold the product. For margin loans the relevant product issuer will pay an ongoing commission between 0% and 0.88% of the outstanding loan balance. Commissions are paid to us by the product provider and are not an additional cost to you.</p>
Credit Assistance (fees for credit assistance)	<p>More details about the fees payable by you will be set out in a quote which we will give you before your loan application is made. You may be required to pay other fees and charges to the credit provider such as an application fee, valuation fees and other fees. The credit provider's Credit Guide (and other disclosure documents) will provide further details. You can request further information about these fees from us.</p>



Nexus Wealth Management Pty Ltd

Privacy Policy

The privacy of your personal information has always been important to us at Nexus Wealth Management Pty Ltd. In addition to complying with existing laws that govern confidential information that you provide to us, we are also required to comply with the Australian Privacy Principles. We will always seek to comply with the Australian Privacy Principles as well as other applicable laws affecting your personal information.

This privacy policy outlines our policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

Collecting Your Personal Information

Your personal information will be collected and held by Nexus Wealth Management Pty Ltd, who is an authorised representative of GWM Adviser Services Limited, an Australian Financial Services Licensee, who does not act in the capacity of an authorised representative in relation to securities:

- providing you with the advisory services that you have requested;
- managing our relationship with you; or
- contacting you about products and services in which you may be interested.

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

If it is reasonable and practicable we will only collect your personal information from you. Generally your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties such as your accountant.

How Your Personal Information is Held

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We will seek to ensure that we take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision to you of the financial advice you have requested. The types of service providers that may be provided with your personal information are:

- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

Your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a purpose that is related to the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Organisations outside Australia

Currently, we do not share your information with organisations outside Australia.

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

Accessing your Personal Information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access, we will provide you with the reasons for this decision. To request

access please contact us (see "Contacting Us and Privacy Issues" below).

Correcting Your Personal Information

We endeavour to take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and provide us with evidence that it is not accurate, complete and up-to-date.

If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us by contacting us on 08 9208 1333. We are committed to resolving your complaint.