



Your On Track Wealth Services advisers are Authorised Representatives of Synchronised Business Services Pty Ltd - ABN 33 007 207 650, and adhere to Synchron's Privacy Policy as listed below:

Statement of Synchron's Privacy Policy

Synchronised Business Services Pty Ltd ('Synchron') is committed to ensuring the confidentiality of client's personal information in accordance with the Australian Privacy Principles in the Privacy Act 1988.

1) Why we collect information

We collect information from clients for a number of reasons including:

- To deliver products or services to you;
- To better understand your requirements and preferences;
- To improve our service to you;
- Preparing your financial plan;
- To provide financial advice to you;
- Establish and manage your investments and accounts;
- Implement your investment and insurance instructions;
- Process any contributions, transfers or payments of benefits;
- Monitor and report the investment performance of your account;
- Reviewing your financial plan;
- To provide you with future products and services you may be interested in;
- To fulfil our regulatory and legislative requirements.

2) How we collect this information

Information is generally collected from:

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

If a client is unable to provide us with their personal information, we may not be able to organise for them to receive a product or service. Clients can nominate an Authorised Representative to access their personal information. This can be revoked at any time.

Synchron may collect personal information from a third party (such as another Financial Adviser, Product Provider or Medical Practitioner) or a publicly available source but only if the client has consented to the collection or it can reasonably be expected that it has been provided by the client.

2.1 Life insurance products

Where a client applies for certain life risk products (such as life insurance, trauma insurance, total and permanent disability insurance) it will be necessary for Synchron and our Authorised Representatives to collect information about a client's health and the health of their family members. This information will only be collected when the client gives their consent by completing the product's application form. The information will be sourced by the Life Insurance company from the client, their medical professional and by other medical professionals where medical tests may have been performed. Due to confidentiality, it is sometimes the case whereby Synchron or the Authorised Representative may not be made fully aware of the medical circumstances by the Life Insurance company.

2.2 Privacy on the Internet

Synchron and our Authorised Representatives may use websites to collect personal information from clients. Clients and Authorised Representatives may receive a password and a personal identification number to access details online. It is a condition of use that this information is kept confidential and secure at all times.

2.2.1 Cookies

These are text files stored on a person's computer when they visit a website. Its sole purpose is to identify users and possibly prepare customised web pages or to save site login information. Synchron 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 Synchron and our Authorised Representatives strive to ensure a client's security, no data transmission over the internet can be guaranteed to be completely secure.

2.2.2 Links to third party websites

Synchron 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 Synchron or our Authorised Representatives.

2.3 Tax File Numbers

Synchron and our Authorised Representatives may need to collect a client's tax file number to provide them with a product or a service (for example, managed fund investments and superannuation products). However this information will be kept securely.

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.

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 Synchron and our Authorised Representatives will need to disclose a client's personal information to third parties. This is generally to assist us in providing the client 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 or applicable);
- The policy owner (where the client is the life insurer but not the owner);
- Exchange of information with authorised financial institutions to confirm bank account details for payment. If required by law or a regulatory body to do so, Synchron and our Authorised Representatives will comply and provide the appropriate body with the required client information.

4.1 Sale of an Authorised Representative's business

In the event that either our Authorised Representative or we propose to sell our business, we may disclose some of a client's personal 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 effected, we or our Authorised Representatives may transfer a client's personal information to the purchaser of the business. The client will be granted at least 14 days notice by mail to their last known mailing address that such a transfer will be taking place. They will then have the opportunity to object to the transfer.

5) Access to personal information

Clients are able to access any personal information that is held by Synchron or our Authorised Representatives subject to limited exceptions or 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, a client will need to contact the Privacy Officer as detailed in this policy. If the information is inaccurate, incomplete or not up to date, the client is encouraged to update their details.

Clients may be charged a small fee applicable to the collection and provision of their personal information but will be notified of this fee prior to processing their request. The Synchron Privacy Officer will be able to advise the client how long it will take to provide the information. Generally however, clients will receive the requested information within 14 days of the request.

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

6) Privacy Officer

Synchron has nominated a Privacy Officer to handle any queries or issues related to Privacy. This person has been nominated at a senior level and has access to the Board.

Name: John Prossor
Phone: 03 9328 3900
Email: j.prossor@synchron.net.au
Post: PO Box 438
North Melbourne VIC 3051

We take our client's privacy seriously and will address your concerns through our complaints handling process. All complaints will be given fair consideration and will aim to be resolved within 45 days. We encourage you to submit your complaint to the Privacy Officer (details above) either via email to 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 and submitting an online form;
- Obtaining a hard copy form at www.oaic.gov.au/about-us/contact-us-page;
- Phone: 1300 363 992;
- Fax: 02 9284 9666;
- Email: 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.