Financial Services Guide

Version 1.3 - March 2026

IA Advice Pty Limited
ABN 29 165 695 143
Australian Financial Services Licence No. 445825

The distribution of this FSG has been approved by IA Advice Pty Ltd

Part A

Important information

Before we provide you with financial advice, you should read this Financial Services Guide (FSG) because it contains the following important information designed to help you decide on whether to use our services:

- Who we are
- The initial and ongoing advice and services we provide;
- How we are paid;
- Who to contact should you have a complaint.

This FSG comprises two parts and is only complete when the licensee profile (Part A) and adviser profile (Part B) are together.

The adviser profile contains information about your adviser and the firm he works for (the Corporate Authorised Representative), their contact details, qualifications, experience and any memberships they may hold. It also outlines the strategies and products for which your adviser can provide advice.

About our licensee

IA ADVICE PTY LTD

IA Advice Pty Ltd holds an Australian Financial Services Licence 'AFSL' Number 445825.

IA Advice Pty Ltd works with its Authorised Representatives to ensure that they are equipped to give high quality wealth advice.

Contact Details

IA Advice Pty Ltd
Level 2, Suite 201, 68 York Street,
SYDNEY NSW 2000
Ph: 1800 845 152 (via Treysta Wealth Management)
Email: info@implementedadvice.com.au

This FSG contains some important information about the services we offer and how we charge for these services.

Included in this document is a profile for each Authorised Representative in our firm. The adviser profile contains information about your adviser; their contact details, qualifications, experience and any memberships they may hold. It also outlines the strategies and products about which your advice can provide advice.

Advice we can provide

Approved products

The IA Advice Pty Ltd Australian Financial Services Licence enables its authorised Representatives to provide advice on and deal in the following financial products;

- Bank accounts and Term Deposits
- Debentures stocks or bonds issued or proposed to be issued by a government
- Life insurance risk products
- Life insurance investment products
- Managed Funds and wrap accounts
- Shares listed on an approved securities exchange
- Superannuation products
- Retirement Savings Accounts

We are also authorised to recommend Managed Discretionary Account services ('MDA'). The only MDA we recommend is the service operated by Implemented Portfolios Pty Ltd. Information regarding the MDA service is included in the Implemented Portfolios FSG which you will be provided with should you elect to use this service.

The particular financial products your Authorised Representative can recommend are detailed in Part B of this FSG.

We maintain a broad approved list, containing investment and insurance products that have been researched by several external research houses as well as our in-house research team.

A copy of the approved list for investment and insurance can be supplied to you upon request.

Transaction services

If you do not require advice from us, but you would like us to help you complete a particular transaction, we can also arrange for you to apply for the kinds of products referred to in Part B. In these cases, we can take your instructions and arrange for the transaction to be completed without providing you with personal advice.

It is important to understand that in these circumstances we will generally ask you to confirm your instructions in writing and to sign a letter that acknowledges you have declined our offer of advice as well as understand the risks of a transaction service. You will be provided with a copy of the letter for your own records.

You can also contact us directly with any instructions relating to your existing financial products. We will accept instructions from our existing clients via telephone, mail or email.

Documents you may receive

Our initial advice will be provided to you in a financial plan, known as a Statement of Advice (SoA). The financial plan contains a summary of your goals and the strategies and financial products we are recommending, to achieve your goals. It also provides you with detailed information about the fees, costs and other benefits we will receive as a result of the advice we have provided.

If at times we provide further advice to that stated in your financial plan we will keep a record of that advice for seven years. You may request a copy for your records by contacting our office.

If we recommend or arrange a financial product for you, we will make available a product disclosure statement (PDS) or investor directed portfolio service (IDPS) guide where relevant. These documents contain the key features of the recommended product, such as its benefits and risks as well as the costs you will pay the product provider to professionally manage your investment or insurance.

You should read any warnings contained in your financial plan, the PDS or IDPS guide carefully before making any decision relating to a financial strategy or product.

Fees for our advice services

How your adviser's business is remunerated depends on the service provided to you. Generally, the remuneration comprises (singularly or a combination);

- Initial advice fee paid by you

- Annual Fee paid by you
- Commissions paid by life insurance companies

All fees and commissions are first received by the Australian Financial Services Licensee, IA Advice, and then passed to your adviser's firm. Full details of the range of the fees charged and the commissions received are detailed in Part B of this FSG.

Your privacy

Your privacy is important to us. To learn more about our collection and handling of your personal information and for details on how to access our Privacy Policy please refer to the Appendix to this FSG.

Another Authorised Representative may be appointed to you if your Authorised Representative leaves IA Advice Pty Ltd or is unable to attend to your needs due to an extended absence from the business. In these circumstances, IA Advice Pty Ltd will write to you advising you of the change. Your personal information will be passed on to the new Authorised Representative.

If you choose to appoint a new Authorised Representative, your new Authorised Representative will be provided access to your policy information. They will be responsible for providing you with ongoing advice relating to those policies and all future advice fees deducted from the policy/(ies) will be paid to your new Authorised Representative.

Professional indemnity insurance

Professional indemnity insurance is maintained by the AFSL IA Advice Pty Ltd, to cover advice, actions and recommendations provided by your Authorised Representative. The insurance satisfies the requirements imposed by the Corporations Act 2001 and financial services regulations.

Confidence in the quality of our advice

If, at any time, you are not satisfied with the advice you receive, or any other aspect of the service provided by your wealth Authorised Representative, you should take the following steps:

- Contact your authorised representative and tell them about your complaint.
- If your complaint is not satisfactorily resolved within three days, please contact IA Advice Complaints on +612 9251 2973 or put your complaint in writing and send it to:

IA Advice Pty Ltd
Level 2, Suite 201, 68 York Street,
SYDNEY NSW 2000
Ph: 1800 845 152 (via Treysta Wealth Management)
Email: kconacher@implementedadvice.com.au

If your complaint has not been resolved satisfactorily, you may escalate your complaint to one of the following External Dispute Resolution Schemes listed in the following below.

Type of complaint	**External complaints service**
Financial advice, investments, superannuation or insurance matters	Australian Financial Complaints Authority (AFCA) In writing to AFCA, GPO Box 3, Melbourne VIC 3001 Free call 1800931678 Email: info@afca.org.au www.afca.org.au
Personal information held	The Privacy Commissioner GPO Box 5218, Sydney NSW 2001 Phone: 1300 363 992 Fax: (02) 9284 9666 Email: privacy@privacy.gov.au

ASIC may be contacted on 1300 300 630 to find out which body may be best to assist you in settling your complaint.

Part B

Clifton Wealth- Adviser Profile

This adviser profile is Part B of the Financial Services Guide and is only complete when the business profile (Part A) is attached.

Clifton Wealth is a Corporate Authorised Representative of IA Advice Pty Ltd. Our Corporate Authorised Representative number issued by the Australian Securities and Investments Commission (ASIC) is 001242530.

Related Entities

IA Advice Pty Ltd, Clifton Wealth, Treysta Wealth Management Pty Ltd and Implemented Portfolios Pty Ltd have some common directors and shareholders.

About our company

Clifton Wealth

We're here to guide you toward the life – and retirement – you want.

At Clifton Wealth, we're all about long-term relationships. By taking the time to get to know you, we strive to make sure our approach to financial advice is always fresh, personalised and works for you.

Your investments are built on an understanding that money management is just one aspect of life. Your quality of life, relationships, passions and dreams are equally important parts of the picture. That's why no two Clifton Wealth portfolios are alike.

Our Approach

We appreciate that everyone has a unique story. It's the reason we get to know each and every one of our clients. We make it our business to become your confidante, strategist and guide. Above all, your adviser will become a trusted friend. In fact, because we work as a team, any time you call Clifton Wealth you'll talk to a person who knows you by name, and understands what you want from life.

Our clients tell us this emphasis on relationships is what sets Clifton Wealth apart.

Once we fully understand your particular needs and aspirations, we'll build a solid financial strategy so that you can enjoy the life you've worked hard to create, in your way.

Our Promise

We promise transparency in our relationship with you. You'll get to know us well, and we'll make sure we understand what you're looking for. You'll come to know us as confidantes who can be relied upon to always act in your best interests.

We'll build a flexible portfolio of investments, created and managed just for you. And it will always have the capacity to change and grow, just as you do.

We understand that lasting wealth is always built on secure foundations, so you can be confident that the wealth you build with our help is sustainable in the long term.

Contact Details – via Treysta Wealth

Ph: 1800 845 152
Email: info@treysta.com.au

SYDNEY Level 2, Suite 201, 68 York Street, SYDNEY NSW 2000	MOSS VALE Shop 8, Calaroga Centre, 1 Kirkham Street MOSS VALE NSW 2577	BOMADERRY Suite 2, 6 Bunberra Street BOMADERRY NSW 2541

This FSG contains some important information about the services we offer and how we charge for these services. You can also find information about our firm at www.cliftonwealth.com.au.

Clifton Wealth Management Adviser Profiles

MARK NAGLE (Head of Advice & Executive Director)

Mark is an authorised representative of IA Advice (ASIC number 304916).

Mark is a thought leader in the advice world and is passionate about improving the quality of advice available to clients in Australia.

Mark's vision is to build the business a presence that can influence the Australian advice industry and provide consumers with a visible and intelligent alternative for financial advice.

Education and qualifications

- Financial Adviser Standards and Ethics Authority (FASEA) – Completed compulsory exam
- Diploma of Financial Planning
- SMSF Accreditation
- Responsible Investment Association Australasia (RIAA) – Certification as a Financial Adviser

Experience

Mark Nagle has been providing financial advice to clients since 2001.

Advice I can provide

I can provide you with strategic and goals-based advice, as well as arrange the types of financial products listed below.

- Deposit and payment products (for example term deposits, cash management accounts and non-cash payment products)
- Retirement Income Streams
- Direct Fixed Interest
- Retail and wholesale managed funds
- Responsible Investment Products certified by RIAA
- Annuities
- Superannuation Products
- Personal and group insurance (excluding general insurance)
- Business succession insurance (excluding general insurance)
- Self-Managed super funds
- Direct Shares
- Managed Investment Scheme products (including IDPS);
- Managed discretionary account services.

Although we provide estate planning advice as part of or incidental to the provision of financial planning advice, we can arrange to provide access to specialist estate planning services, where required.

Related Entities

An entity related to Mark Nagle is a shareholder of Treysta Wealth Management.

ADAM DRINKWATER (Senior Financial Adviser)

Adam is an authorised representative of IA Advice (ASIC number 001241554).

Adam is passionate about working closely with clients to provide improved long-term outcomes and support through various stages of life. Adam places great importance in continual development and is eager to be at the forefront of an evolving industry.

Education and qualifications

- Financial Adviser Standards and Ethics Authority (FASEA) – Completed compulsory exam
- Bachelor of Arts - Business
- Advanced Diploma of Financial Planning
- SMSF Accreditation
- Responsible Investment Association Australasia (RIAA) – Certification as a Financial Adviser
- Bridging Courses – Client Engagement Skills, Ethics and Professionalism in Financial Advice & Economic and Legal Context for Financial Planning

Experience

Adam Drinkwater has been providing financial advice to clients since 2014.

Advice I can provide

I can provide you with strategic advice as well as arrange the types of financial products listed below.

- Deposit and payment products (for example term deposits, cash management accounts and non-cash payment products)
- Retirement Income Streams
- Direct Fixed Interest
- Retail and wholesale managed funds
- Responsible Investment Products certified by RIAA
- Annuities
- Superannuation Products
- Personal and group insurance (excluding general insurance)
- Business succession insurance (excluding general insurance)
- Self-Managed super funds
- Direct Shares
- Managed Investment Scheme products (including IDPS);
- Managed discretionary account services.

Although we provide estate planning advice as part of or incidental to the provision of financial planning advice, we can arrange to provide access to specialist estate planning services, where required.

Related Entities

An entity related to Adam Drinkwater is a shareholder of Treysta Wealth Management.

AMANDA HALSE (Financial Adviser)

Amanda is an authorised representative of IA Advice (ASIC number 001263401).

A dedicated and innovative financial services specialist with over 20 years' financial services industry experience, Amanda enjoys working with clients to help protect and grow their financial base, allowing them to find a balance and financial security across a range of lifestyle and financial related areas. Amanda is a specialist in retirement living and aged care financial advice.

Education and qualifications

- Financial Adviser Standards and Ethics Authority (FASEA) – Completed compulsory exam
- Master of Financial Planning
- Diploma of Financial Services (Financial Planning)
- Diploma of Financial Markets
- Accredited Aged Care Professional

Experience

Amanda Halse has been providing financial advice to clients since 2022.

Advice I can provide

I can provide you with strategic and goals-based advice, as well as arrange the types of financial products listed below.

- Deposit and payment products (for example term deposits, cash management accounts and non-cash payment products)
- Retirement Income Streams
- Direct Fixed Interest
- Retail and wholesale managed funds
- Responsible Investment Products certified by RIAA
- Annuities
- Superannuation Products
- Personal and group insurance (excluding general insurance)
- Business succession insurance (excluding general insurance)
- Self-Managed super funds
- Direct Shares
- Managed Investment Scheme products (including IDPS);
- Managed discretionary account services.

Although we provide estate planning advice as part of, or incidental to, the provision of financial planning advice, we can arrange to provide access to specialist estate planning services, where required.

KIEREN O'KEEFE (Associate Adviser)

Kieren is an authorised representative of IA Advice (ASIC number 001307838).

Education and qualifications

- Bachelor of Law/Bachelor of Commerce (Finance)
- Graduate Diploma of Financial Planning

Experience

Kieren has been an Associate Adviser since 2022.

Kieren is currently undertaking his Professional Year with completion expected to be in July 2024.

Advice I can provide

I can provide you with strategic and goals-based advice, as well as arrange the types of financial products listed below.

- Deposit and payment products (for example term deposits, cash management accounts and non-cash payment products)
- Retirement Income Streams
- Direct Fixed Interest
- Retail and wholesale managed funds
- Annuities
- Superannuation Products
- Personal and group insurance (excluding general insurance)
- Business succession insurance (excluding general insurance)
- Self-Managed super funds
- Direct Shares
- Managed Investment Scheme products (including IDPS);
- Managed discretionary account services.

Although we provide estate planning advice as part of, or incidental to, the provision of financial planning advice, we can arrange to provide access to specialist estate planning services, where required.

What are our costs?

Initial Advice Fees
The initial advice fee covers the cost of researching and preparing your plan and is based on a set dollar amount.

Before providing you with initial advice we will prepare an agreement that sets out what our initial advice will cover and how much it will cost you. In addition, the initial advice fee will be disclosed in your financial plan (Statement of Advice).

Annual Fee Agreement
The Annual Fee Agreement covers the cost to review the strategies and the products recommended in your SoA.

Depending on the services you require and your circumstances our minimum Annual Fee is $6,000 plus GST per annum or as agreed with by your Adviser and may include the commission received by your insurance provider.

Clifton Wealth will provide you with an annual fee agreement which sets out services we will provide, your payment method and how the service can be terminated. In addition, the Annual Fee will be clearly disclosed.

We may receive commissions from life insurance companies, as follows:
The issuers of life insurance products pay IA Advice an initial commission. This commission, which can vary depending on the product and insurance company, is in a range of between 0% and .66% (includes GST) of your first year's premium.

The issuers of life insurance products also pay IA Advice an ongoing commission. This commission, which can vary depending on the product and insurance company, is in a range of between 0% and .22% (includes GST) of your second and subsequent year's premium. This commission is paid to the licensee for as long as you hold the product.

Performance Fee (if applicable)
A Performance Fee of 22.00% of any net outperformance of the relevant program's benchmark will be calculated and applied to your account on a quarterly basis. These percentages and benchmarks, once agreed upon, will be outlined within your SoA. Should the performance of your portfolio not reach the agreed benchmark, this shortfall will be recovered prior to any performance fees being payable in subsequent periods.

Performance is calculated net of all ongoing fees, including management fees and brokerage charges.

Amounts paid to Clifton Wealth Management Pty Ltd

Of the above amounts paid to IA Advice (the Licensee), Clifton Wealth Wealth Management Pty Ltd will receive 100% of all revenue generated including any fees and commissions charged. Your adviser is paid a salary.

The exact amounts of any fees, commissions, bonuses or other incentives received by Clifton Wealth Management or IA Advice (Licensee) will be included in the written Statement of Advice provided to you or, disclosed orally or in writing at the time you are provided with any further advice.

Related Parties and Interests

IA Advice and Kensington Asset Management are related entities and have common directors and shareholders. IA Advice representatives may have a shareholding in Kensington Asset Management – where this is the case, that is disclosed in your Statement of Advice.

- Kensington Asset Management receives a management fee for providing its investment services, which is wholly separate to any advice fees payable to IA Advice. This fee will be disclosed in the Statement of Advice provided to you.
- Where IA Advice and any of its advisers recommend as part of their advice to you the use of the Kensington Asset Management investment services, there is no volume-based financial benefit, fee, or other compensation payable.

Appendix 1: Privacy Policy

Clifton Wealth is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information. At **Clifton Wealth**, we understand that the privacy of your information is important to you and we respect the confidentiality of the information that you provide to us. Protecting your information is an important part of maintaining trust between us and our clients and by handling information in a secure manner we build strong relationships.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at www.oaic.gov.au

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include names, postal addresses, email addresses, phone numbers, date of birth, financial information, employment details, residency and citizenship status.

We may also collect sensitive information about your medical history and your health and lifestyle to assist with providing financial advice/research about life insurance products.

This Personal Information is obtained in many ways including;

Clients

- Provided to us by you as part of our service offering and to assist in our research in deciding strategies and products which are appropriate to your respective needs
- Either face-to-face via a signed Fact Find, or over the phone.

Third Parties

- When authorised by you we may reach out to institutions, your employer and/or your accountant to obtain information.

How do we use your information?

We collect your Personal Information for the primary purpose of providing our services to you. In addition, we may utilise this information to communicate news or special events to you.

We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

We use the personal information provided by you as part of our service offering to help us prepare accurate and appropriate financial plans and strategies.

Some such information may be shared with third parties to be used exclusively for the purpose of the work we are doing for you.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law.

Security of Personal Information

We strive to ensure that the personal information that you provide to us is stored safely and securely. We take a number of precautions to protect the personal information we hold about you from misuse, interference and loss, and from unauthorised access, modification or disclosure.

We have a range of practices and policies in place to protect personal information we hold, including:

- educating our staff about how to protect your personal information and updating them about cybersecurity developments, threats and scams,
- requiring our staff to use passwords when accessing our systems,
- where appropriate, using strict confidentiality arrangements restricting third parties' use or disclose of personal information for any unauthorised purposes,
- employing physical and electronic means, including access controls (as required) to protect against unauthorised access to buildings,
- employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons, malware and viruses from entering our systems,
- the systems we use are on dedicated secure networks or transmit electronic data via encryption.
- We do not store any physical copies of the information received.

Where personal information is no longer required, we take steps to de-identify or destroy the information in a secure manner. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us.

Clifton Wealth will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

We may amend or update our Privacy Policy as required by law or as our business processes or technology changes.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy, please contact us at:

Mail: Level 2, Suite 201, 68 York Street, Sydney, NSW, 2000

Phone: 02 9241 2575

Email: info@treysta.com.au

We will acknowledge receipt of a complaint immediately, however, where this is not possible, acknowledgement will be made as soon as practicable. We will then investigate the complaint and respond to you within 45 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution.

Appendix 2: Data Protection Policy

Intent

To assure compliance with relevant data protection legislation;
To protect the fundamental right to data protection with respect to the processing of personal, sensitive and health information;
To establish principles of transparency and fairness for the management of personal, health, sensitive or confidential information at **Clifton Wealth**.

Scope

This policy covers the management of all personal, sensitive and health information at **Clifton Wealth** no matter how this information is collected or stored.

The policy is applicable to all staff within Clifton Wealth.

Exclusions

This policy does not apply to personal information or data which has been manifestly made public by the data subject or is legitimately already within the public domain.
This policy does not include information that relates to a corporate, government or business entity.

Objectives

To guide staff in the responsible collection, use, disclosure and handling of information collected and managed by **Clifton Wealth**, which relates personally to an individual or their affairs.

Policy Provisions

1. Management of personal, sensitive, health and confidential information

Clifton Wealth is committed to the responsible handling, and open and transparent management, of personal, sensitive, health and confidential information and to protecting the right to data protection of individuals whose information it holds.

Clifton Wealth must not act or engage in a practice that breaches any relevant data protection legislation in Australia; except where other Australian or international jurisdiction legislation specifically requires or allows the practice.

2. Basic Privacy and confidentiality principles

The following basic privacy principles must be applied in accordance with the relevant supporting instruction.

Clifton Wealth and all its operations must:

a. Collect only that information necessary to fulfil **Clifton Wealth** functions and activities.

b. Use the information only for the purpose for which it was collected, for related secondary purposes, with consent or as required or permitted by law.

c. Manage all data breaches in accordance with the **Clifton Wealth** procedure and always consider, in a non-self-serving manner, notification to impacted individuals.

d. Do not use or disclose personal information for the purpose of direct marketing, unless an exemption applies or unless express consent has been obtained from the individual.

e. Endeavour to ensure that information is accurate, complete and up-to-date.

f. Ensure the security of information and its proper storage, archiving or disposal in accordance with appropriate recordkeeping standards and information technology safeguards.

g. By arrangement, enable individuals to access their data and make appropriate corrections, in accordance with relevant access procedures.

h. Collect and use sensitive information only in accordance with the relevant **Clifton Wealth** procedure, or where required or permitted by law.

3. Member's personal information

The principles of Australian privacy law are the base or minimum level of information management and protections for all **Clifton Wealth** members and their personal, sensitive and health information.

Access and Correction of Personal Information

Instructions, steps and actions

1. Access to personal information

As a rule, **Clifton Wealth** endeavours to let people see their own information in the simplest way possible and correct it where necessary.

Should an individual request to access their own information, **Clifton Wealth** will assist in processing this request at no extra charge, though an administrative fee may be charged for providing a copy of the client's personal information.

In order to protect the client's personal information, identification verification may be requested prior to releasing the requested information.

2. Correction of personal information

If **Clifton Wealth** holds personal information about an individual and the individual is able to establish to the satisfaction of **Clifton Wealth** that the information is not accurate, complete and up to date, **Clifton Wealth** will take reasonable steps to correct the information so that it is accurate, complete and up-to-date.

Collection of personal information instruction

Instruction Statement

This is a supporting document for the Data Protection Policy and guides information management in accordance with that policy and relevant privacy law.

Instruction steps and action

1. Collection Fundamentals

Collection is a fundamental part of privacy protection and it is essential that it is managed correctly. In simple terms the rules are:

a. Collect only what you need for the advice or research you are conducting.

b. Do it lawfully and fairly.

c. Don't intrude unreasonably

d. Tell people you are doing it.

In practice this means that you should only collect personal information if it is necessary for one or more of **Clifton Wealth** functions or activities.

2. Required information

If required information in **Clifton Wealth** is not completed and/or provided by an individual, this will impact the ability of the advice/research being completed to a proper degree.

If this missing data is identified, reasonable effort should be made in obtaining this advice from the financial client. Should this not be provided by the client, this in turn may impact on the relevance/appropriateness of the advice and **Clifton Wealth** reserves the right to not proceed with any work until properly supplied.

3. Unsolicited personal information

Personal information may be given to **Clifton Wealth** that was not requested (unsolicited). Unsolicited personal information must also be managed in accordance with Clifton Wealth's data protection policy and relevant privacy law.

Examples of unsolicited information may be letters or emails to **Clifton Wealth** from clients which are not relevant to the advice document or research being conducted.

4. Sensitive and health information

Sensitive information about people – like their ethnic background, religion, political views or affiliations, sexual preference or criminal records – has special protection under law. Such information can only be collected if it is essential for **Clifton Wealth** operations, required by law, or with specific and informed consent.

Do not collect it without checking the rules first.

Sensitive and health information have special protections because this kind of information can be used to discriminate against individuals.

It is advised not to collect sensitive or health information about an individual unless certain conditions are met, including:

a. The individual has consented;

b. This information is required to assist with providing financial advice and research about life insurance products.

c. The collection is required under law; and/or

d. The collection is necessary to prevent or lessen a serious and imminent threat to the life or health of any individual.

There are certain exemptions to the above requirements, such as where:

a. The collection is necessary for research, or the compilation or analysis of statistics, relevant to government funded targeted welfare or educational services;

b. The information relates to an individual's racial or ethnic origin and is collected for the purpose of providing government funded targeted welfare or education services;

c. There is no reasonably practicable alternative to collecting the information for that purpose; and/or

d. It is impracticable for **Clifton Wealth** to seek the individual's consent to the collection.

Management of personal information instruction

Instruction Statement

This is a supporting document for the Privacy and Data Protection Policy and guides information management in accordance with that policy and relevant privacy law.

Instruction steps and actions

1. Management of personal information

The day to day management of personal information is everyone's responsibility.

In brief, rules for managing personal, sensitive and health information are to keep it accurate, complete, up to-date, and secure.

Clifton Wealth is available for advice and guidance when needed.

2. Maintaining accuracy and quality of personal information

Staff must take reasonable steps to ensure the information they are working with is accurate.

Personal information that is inaccurate affects the quality of **Clifton Wealth** service provision. For example, a wrong birthday may impact on a client's Life insurance premiums which in turn may lead to a misrepresentation of the costs involved.

3. Data security

Security and retention are part of the 'life cycle' of personal information or data. All staff of **Clifton Wealth** must take reasonable steps to ensure that:

a. Personal information is protected from misuse, loss, unauthorised access or modification, or improper disclosure.

b. Information has not been changed or tampered with.

c. Hard copy records (if any) containing personal information should be kept in a secure location and away from non-authorized persons.

d. Communications and computing systems have appropriate access security controls and are not disrupted in their normal operations.

e. Authentication processes (for identification) are adhered to, in that a person accessing or providing information are who they claim to be.

If **Clifton Wealth** is to ensure the quality and accuracy of personal information, this places an obligation upon an individual, including staff, volunteers and members to provide relevant and accurate information (and where relevant corrections) to **Clifton Wealth**.

Clifton Wealth takes reasonable steps to destroy or permanently de-identify personal information if it is no longer needed for any purpose and in accordance with applicable recordkeeping law and standards. Recordkeeping standards detail the need for **Clifton Wealth** to keep full and accurate.

4. Openness and transparency

Clifton Wealth, and its staff must be open about what is done with other people's information. This includes providing the Data Protection Policy to anyone who requests it.
Questions can be referred to the **Clifton Wealth** managing director.

Use and disclosure of personal information instruction

Instruction Statement

This is a supporting document for the Data Protection Policy and guides information management in accordance with that policy and relevant privacy law.

Instruction steps and actions

1. Use and disclosure of Clifton Wealth's primary purposes

In most cases, use and disclose of an individual's personal information only for the purpose you collected it – this is defined as a primary purpose. For example, client's details are collected to properly provide financial advice and/or research.

Disclosure must always be limited to what is sufficient for the purpose.

2. Use and disclosure of related secondary purposes

There is some allowance to use and disclose personal information for a secondary purpose that is related to the primary purpose and is what someone would reasonably expect. An example of a secondary purpose would be to use a member's email address to provide details of **Clifton Wealth** news or events.
Where practicable, prior consent should be obtained before use or disclosure for a secondary purpose.
Impracticality to obtain consent must be assessed in context, but generally is means more than mere inconvenience, incurring some cost or effort, or undesirability of seeking consent.
When use or disclosure of personal information is required for a secondary purpose, without the prior consent of an individual, the following must be considered:

a. The secondary purpose must relate to the primary purpose for collection; and
b. The individual would reasonably expect the use or disclosure of the information for that secondary purpose.

It should be noted that sensitivity of information may affect reasonable expectation.

Please note: If the personal information is sensitive information (e.g. political views, sexual orientation, ethnicity) use and disclosure must be directly related to primary purpose of collection and have consent where that is

practicable. If you are considering using or disclosing personal or sensitive information for a secondary purpose, please consult with **Clifton Wealth** managing director.

3. Use and disclosure for the prevention of risk to life, health, safety and welfare

Some important interests, such as protecting health and safety, can justify use and disclosure without consent. This kind of lawful use and disclosure can be for purposes unrelated to the primary purpose and must meet the following test:

If **Clifton Wealth** reasonably believes that the use or disclosure is necessary to lessen or prevent either:

a. A serious and imminent threat to an individual's life, health, safety or welfare; and/or

b. A serious threat to public health, public safety or public welfare.

In most cases, such a disclosure must be to an appropriate agency or recipient that is able to lessen or prevent the threat. For example, depending on the circumstances, appropriate recipients would be the police, emergency services or health authorities.

4. Use and disclosure to investigate suspected unlawful activity or serious misconduct

If **Clifton Wealth** has reason to suspect that unlawful activity has been, is being or may be engaged in, use or disclosure of personal information may be undertaken as a necessary part of its investigation of the matter or in reporting its concerns to relevant persons or authorities.

Misconduct by staff, volunteers and members may also be considered to be unlawful if it contravenes a statutory obligation. Examples of such obligations include misusing information acquired during official duties or breaching the relevant Codes of Conduct. Use and disclosure of personal information at any stage of an investigation into serious misconduct for the purposes of determining whether the suspected activity is taking place is permitted where necessary to the investigation.

Where it is proposed to use or disclose personal information in order to investigate a matter within **Clifton Wealth** itself, the following must be taken into consideration:

a. Any suspicion of wrongdoing should be based on reasonable grounds, not just unsubstantiated gossip or rumour;

b. The use or disclosure must be considered necessary after due consideration of alternatives; and

c. The use or disclosure should be as confined as possible throughout the investigation.

5. Use and disclosure required and authorised by law

Personal information may be used or disclosed otherwise than for the primary purpose if such use or disclosure is required or authorised by or under law:

a. Required by law – means that there is a legal obligation to use or disclose personal information in a particular way. It should be noted that, in Australia, other laws take priority over privacy law provisions in this regard.

b. Authorised by law – means that while the law permits the use or disclosure, it does not make either compulsory. Where doubt exists for this provision, please consult with **Clifton Wealth** managing director.

6. Use and disclosure to a law enforcement agency

Use and disclosure of personal information without consent is permitted when **Clifton Wealth** reasonably believes that it is necessary for one or more of the following upon request by, or on behalf of, a law enforcement agency:

a. The prevention, detection, investigation, prosecution or punishment of criminal offences or breaches of a law imposing a penalty or sanction;

b. The enforcement of laws relating to the confiscation of the proceeds of crime;

c. The protection of the public revenue;

d. The prevention, detection, investigation or remedying of seriously improper conduct; and/or

e. The preparation for, or conduct of, proceedings before any court or tribunal.

In emergency situations, disclosures of **Clifton Wealth** client information to appropriate agencies, such as emergency health services or the Police, can be authorised by the managing director.

A written record must be kept of all such disclosures and circumstances which will be retained by **Clifton Wealth.**

Consequences of failing to utilise personal information appropriately

Instruction Statement

This is a supporting document for the Data Protection Policy and guides the consequences if an employee fails to manage information in accordance to the Data Protection Policy.

Instruction steps and actions

1. Confidentiality Agreement

In the course of a staff's employment, and due to the nature of the job scope, an employee will have access to and become privy to the financial background, salary information, personal/health information, and other confidential information of the Company and/or clients of the Company.

As an employee of **Clifton Wealth**, an employee agrees that they will not, at any time and without the prior written consent of the Directors, disclose or make any use whatsoever of such information, except as may be requested by the Directors or otherwise be required by applicable law.

In the event that **Clifton Wealth** obtains confidential information as aforementioned from any clients or third party, an employee shall not, without the written consent of the Directors at any time (either during their employment or after the termination of their employment), infringe restrictions on disclosure agreed to by **Clifton Wealth**. This has been agreed upon in our letter of employment.

2. Termination for Cause

If the above guidelines and agreements are not adhered to, an employee's employment with **Clifton Wealth** can be terminated immediately (without prejudice to and in addition to any other remedy available to us). If this breach of conduct was to a lesser degree, disciplinary action will be pursued in proportion to the severity of the case.