

PRIVACY POLICY

This Privacy Policy has been adopted by Millhaven Financial Services Pty Ltd and is referred to herein as “Millhaven”, “we”, “us” and “our”.

By using our website and by submitting information to us you agree to us using your personal information in accordance with this Privacy Policy. Millhaven reserves the right to make amendments to this Privacy Policy at any time.

If you have objections to the Privacy Policy, you should not access or use this website and notify Millhaven.

Commitment

Millhaven is committed to protecting your personal information. This Privacy Policy outlines how we treat your information in accordance with the Australian Privacy Principles 2014 (APPs) established under the Privacy Act 1988 (Privacy Act).

You can obtain further information regarding the APPs and your privacy rights at the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

Personal or sensitive information we collect

We may collect personal information from you such as your name and phone number. We may also collect sensitive information from you (in specific circumstances) such as information about your wealth.

The type of information we may collect depends on your dealings with us and may include:

- Name, contact details and identification information such as your tax file number.
- Family details including spouse and dependants.
- Employment information – current and history.
- Drivers license details
- Financial information – bank accounts, shareholdings, loans.
- Financial circumstances – assets and liabilities, income, expenditure, insurance, superannuation, estate planning.
- Financial needs and goals.
- Risk and investment preferences.
- Insurance arrangements or sensitive information that might be required to obtain insurance cover.

Collection & Use

We will primarily collect information from you directly through face-to-face meetings, telephone, or online discussions with you, by asking you to complete client questionnaires, an application process or through correspondence with you. We sometimes collect personal information from a third party or a publicly available source to enable us to provide you with the services you have requested.

We collect personal information from you to be able to provide you with comprehensive financial planning. Some of these services include:

- Providing you with financial planning advice;
- Preparing financial accounts
- General planning and administration;
- Providing recommendations on insurance and/or superannuation;
- Providing recommendations and implementation on investment strategies;
- Monitoring your investment portfolios;
- Reviewing financial plans; and
- Liaising with third parties such as banks, credit reporting bodies, superannuation fund managers, life insurance companies and other financial institutions on your behalf.

We also collect personal information through our website such as your browser type, version and language, operating system, pages viewed while browsing the website and page access times which may involve the use of cookies. We will delete the cookies every ###

This information is used internally for the purpose of gauging visitor traffic, trends and delivering personalised content to you while you are visiting the website. From time to time, we may use customer information for new, unanticipated uses not previously disclosed in our privacy notice. If our information practices change at some time in the future, we will use for these new purposes only, data collected from the time of the policy change forward will adhere to our updated practices.

How do we store your personal information?

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia and owned and managed by our external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Disclosure

We may provide personal information about our clients to organisations outside of Millhaven. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Millhaven may disclose your personal information:

- In connection with the services provided to you;
- Where you consent to such disclosure;
- For a related purpose where you would reasonably expect such disclosure;

- To provide you with direct marketing materials that may be of interest to you such as articles or product brochures; and
- Any circumstance otherwise authorised by the Apps and/or Privacy Act.

We will only use sensitive information for the primary purpose it was obtained and for a secondary purpose that is directly related to the primary purpose with your consent or where otherwise required by law. We may disclose your personal and sensitive information to the following entities:

- Millhaven representatives, employee, agent relationship manager, contractor or external service providers;
- The Australian Taxation Office (ATO) to meet ongoing compliance;
- The Australian Securities & Investments Commission (ASIC) or other institutions on request to meet ongoing compliance, mandatory professional standards and other legal obligations;
- Insurance providers, superannuation fund managers and product issuers for the purpose of implementing your financial plan in accordance with the recommendations made by us;
- Administrative service providers in regard to your investments to assist them with reporting, and any other administrative tasks relating to your investments;
- Our panel of approved SMSF auditors to arrange for the audit of your SMSF;
- Approved entities who recommend and implement a direct share arrangement as part of your financial plan;
- Persons who provide finance or other financial products to you or to whom an application has been made on your behalf;
- As required by law or directed by legal decision/process;
- Financial consultants, lawyers, accountants and advisers;
- Any industry body, tribunal, court or otherwise connected with any complaint regarding our services;
- Any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

Do we disclose personal information overseas?

In some cases, in order to conduct our business, we may disclose your personal information to a recipient which is located outside Australia. This includes:

- Millhaven's service providers which are located in the Philippines;
- Any financial institution which you hold an account with overseas where you have given us permission to make enquiries on your behalf.

We will not send personal information to recipients outside of Australia unless:

- We have taken reasonable steps to ensure that the recipient does not breach the Act, the APPs;
- The recipient is subject to an information privacy scheme similar to the Privacy Act; or
- The individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

Security

Your personal information is regarded as confidential and is held in both hard copy and electronic versions. Millhaven takes all possible precautions to ensure your information is not misused, lost, modified, accessed by unauthorised persons or disclosed. We have policies and procedures on the secure storage of your information and implemented technology security measures such as access passwords and firewalls on all devices.

Where our employees work remotely or from home, we implement the following additional security measures:

- Two-factor authentication is enabled for all remote working arrangements;
- Password complexity is enforced, and employees are required to change their password at regular intervals;
- We ensure that employees only have access to personal information which is directly relevant to their duties;
- Employees are not permitted to work in public spaces;
- We use audit trails and audit logs to track access to an individual's personal information by an employee;
- We monitor access to personal information, and will investigate and take appropriate action if any instances of unauthorised access by employees are detected;
- Employees must ensure that devices are locked when not in use;
- Employees must ensure that no other member of their household uses their work device;
- Employees must store devices in a safe location when not in use;
- Employees may not make hard copies of documents containing personal information, nor may they email documents containing personal information to their personal email accounts; and
- Employees may not disclose an individual's personal information to colleagues or third parties, via personal chat groups.

Millhaven is familiar with the requirements of the Notifiable Data Breaches scheme and are committed to responding to data breaches in accordance with their obligations under the Privacy Act. Millhaven will notify the Australian Information Commissioner and you if there is unauthorised access to, unauthorised disclosure of, or loss of, personal information held by Millhaven and the access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates in accordance with the Privacy Act.

Direct marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

Accessing, Updating and Correcting Your Personal and Sensitive Information

You have a right to access your personal information, subject to exceptions allowed by law. If you would like to do so, please let us know. You may be required to put your request in writing for security reasons. Depending upon the complexity of the request, we will endeavour to respond within four weeks. Millhaven reserves the right to charge a fee for searching for, and providing access to, your information on a per request basis.

If at any time you believe that the information we hold about you is incomplete, inaccurate, irrelevant, misleading or not up-to-date, please contact Millhaven and we will take reasonable steps to correct the information in accordance with the Privacy Act.

Should you wish to elect out of receiving direct marketing material please contact Millhaven and we will update our records accordingly.

Complaints

If you have a complaint regarding the way Millhaven have handled your information, or any other matter, you may contact us by:

- Telephone: (02) 9440 9447
- Email: admin@millhaven.com.au
- In writing: Millhaven Financial Services
PO Box 5307
TURRAMURRA NSW 2074

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- Telephone: 1300 363 992
- Email: enquiries@oaic.gov.au
- In writing: Director of Complaints,
Office of the Australian Information Commissioner,
GPO Box 5218, SYDNEY NSW 2001

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