

Privacy Policy

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Privacy Policy

1. Overview

To ensure that APP entities comply with their privacy obligations. This policy can be used for credit providers, reporting entities under the AML/CTF Act and APP entities.

The OAIC recommends that privacy policies be as specific as possible, e.g. listing third parties the entity interacts with and using definitive language such as "we collect" rather than "we may collect".

At clause 3.2, there is the necessary distinction between using and disclosing information overseas, this distinction should be brought to the attention of clients when drafting the policy. The distinction is set out by the OAIC as follows:

- 'Use' — generally, an organisation or agency uses personal information when it handles and manages that information within the organisation or agency's effective control.
- Disclosure' — an organisation or agency discloses personal information when it makes it accessible or visible to others outside the organisation or agency and releases the subsequent handling of the personal information from its effective control.

This template must only be used where information is collected from individuals in Australia. This document does not contemplate, consider or satisfy laws that may apply to personal data collected from other countries or about individuals residing in countries other than Australia.

This Policy was last updated on October 2025.

Advice Evolution Pty Ltd 137 858 023 is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

While we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way, we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

All authorized representatives of Advice Evolution are bound by this Policy.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer in the first instance:

Privacy Officer Contact: David Harris

Email: admin@adviceevolution.com.au

Postal address: PO Box 347 Mona Vale NSW 1660

Attention: Privacy Officer

Advice Evolution Pty Ltd

Suite 302 20 Bungan St, Mona Vale NSW 2103

Our website contains links to other websites. When you click on a link to another site, you are no longer subject to this Policy.

2. What types of information do we collect and why?

In the course of providing our goods and services to you, we collect personal and other information about you that is relevant and necessary in order for us to provide you with those services. The types of information we hold depends on the services provided. When you provide us with your personal information, you are agreeing to our collection and handling of your personal information in accordance with this Privacy Policy. We collect personal information through a number of mechanisms, including:

- **Collection From You**

We collect and store information you provide directly to us (either in person, by email, by phone, or by any other direct means) in order to deliver our goods and services. This includes:

- **Contact information:** such as your name, address, email address, telephone number;
- **Personal information:** such as date of birth and driver's licence details;
- **Financial and credit information:** such as your payment information (credit card, bank account, etc);
- **Business details:** such as your Australian Business Number; and/or

- **Communications**

When you communicate with us, we collect information such as your contact details (such as email address or phone number). You can elect to not receive communications from us by contacting our Privacy Officer.

We also engage third party services that provide us with information about how you interact with some communications we distribute.

- **Digital Platforms**

If you access our goods or services by connecting a social media login (such as Facebook or Google) we collect information derived, associated or connected with that platform where permitted by the platform's terms of service. Any information we collect from social media, or other online platforms, is collected in accordance with that platform's terms and conditions.

- **Through Other Sources**

Where necessary, we also collect your information from publicly available records. This can include information relating to an individual's credit worthiness and other

information from credit providers, subject to legal restrictions. Where appropriate and necessary to do so we collect information from public records such as those maintained by the Australian Securities and Investments Commission, Australian Financial Security Authority (such as the Personal Property Securities Register), and land titles offices in each state. We may do this where it is unreasonable or impractical to collect this information from you.

If you have previously applied for a position with us we may have received your personal information from third parties such as recruiters or external websites. We use the information we receive to contact you about any potential opportunities or to evaluate your candidacy.

- **Sensitive Information**

We collect information considered to be sensitive information in the Privacy Act. This may include membership of a professional or trade association, health information, tax file number, and other related information. We collect this information in order to provide you with tailored financial advice and appropriately assess your circumstances and comply with our regulatory obligations.

We will only collect this information directly from you or where we have consent to collect the information from a third party.

You have the option of not identifying yourself or interacting with us using a pseudonym to make general inquiries about the goods and services that we offer, however, we will not be able to provide services to you without this information.

3. How do we use your personal information?

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related, or in the case of sensitive information, a purpose directly related, to that primary purpose and if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of developing your financial plan and for other purposes related to that primary purpose. From time to time, we may use your information in order to assess and bring to your attention other products and services that may be relevant to your financial plan.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

We may also use your personal information where that use is required or authorized under an Australian law, including to fulfil our own obligations

- **Use of Artificial Intelligence Systems**

We may utilise some artificial intelligence systems to provide you with our services. This includes the processing of personal information by securely controlled artificial intelligence systems. We use these systems to collate information, draft internal notes and build portfolios.

If the collation of personal information results in creating new personal information such as allowing a view of your financial position we will always verify that we are permitted to hold this information.

We always ensure that where these artificial intelligence systems are used, they do not disclose your personal information outside of our organisation. If you have any concerns or questions about our processing of your personal information using artificial intelligence, please contact our Privacy Officer.

- **Related Party and Group Transfers**

We are part of Advice Evolution Licensee and its practices, and as such, we provide your information to other entities within the group of companies. This transfer of information is compliant with s 13B of the Privacy Act.

- **Disclosure of Personal Information to Third Parties**

We may disclose your information to third parties who assist us in providing, managing and administering our goods and services. We will also disclose your personal information where such disclosure is required or authorised by Australian law.

We disclose your personal information to third parties that:

- Manage and enhance our customer database;
- Process information;
- Assess your interest in our products or services;
- Conduct customer research or satisfaction surveys;
- Send marketing information to you on our behalf;
- Other organisations listed as trade references in a credit application including; and
- Other purposes related to the above.

We do not sell or license your information to third parties.

- **Sending Information Overseas**

Personal information is sent overseas in limited circumstances. We send personal information to:

- Overseas recipients located in the European Union, New Zealand, and the Philippines, who have access to the information you provide to enable their role in providing administrative support as well as assisting in delivering various services; and/ or
- External service providers that assist our organisation such as with internal operations, market research and the distribution of newsletters, standards and other publications.

We take all steps reasonable in the circumstances to ensure that those we disclose personal information to overseas protect your information. This includes the use

of contractual arrangements to control how third parties use and handle personal information overseas.

While we may store information overseas, we retain exclusive access to that information, and it will not be further accessed or disclosed except in accordance with this Policy.

- **Disclosure of Credit Information to Third Parties**

We do not disclose your credit information to any credit reporting bodies.

4. How do we store and secure the information we collect?

We store your personal information as files on our electronic database system with appropriate back up and security systems.

- **Security and Management of Personal Information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and authorized access, modification or disclosure. We do this by:

- putting in place electronic and procedural safeguards in line with industry standards;
- requiring any third party providers to have acceptable security measures to keep personal information secure;
- limiting access to the information we collect about you;
- imposing confidentiality obligations on our employees;
- providing privacy training (including on the appropriate use of systems) to those who are responsible for handling your personal information;
- only providing access to personal information once proper identification has been given; and
- using encryptions or 2FA (Two-Factor Authentication) to ensure the security of stored data

While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you in accordance with our obligations under the Privacy Act.

If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

5. How to access and control your information?

- **Accessing the Information We Hold About You**

Under the APPs you may be able to:

- obtain a copy of the personal information that we hold about you; and
- identify where we have obtained your Personal Information from, if we have used or disclosed that Personal Information for direct marketing purposes.

To make a request to access this information please contact us in writing. We will require you to verify your identity and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

If we accept your request for access, we may charge a fee to cover the costs of retrieving, reviewing and copying any material requested. However, we will never charge you for making a request to access information itself.

We will provide written reasons if your request (or any part of it) is rejected, as well as providing details for making a complaint about the refusal if necessary.

- **Updating Your Personal Information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact our Privacy Officer if you believe that the information we hold about you requires correction or is out of date.

We endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to credit information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

- **Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Officer with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#)

6. Queries & Other Information

Additional queries should be directed to compliance@aegp.com.au.

Key Information

Prepared by:	AFSL Compliance
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Person responsible for review:	Compliance Officer

References:

Statutory.

Privacy Act 1988 (Cth)

Anti-Money Laundering and Counter Terrorism Financing Act 2006