



# Privacy Policy

for

Harts Financial Group Pty Ltd  
(ABN 80 128 903 962 / AFSL & ACL 324390)

and

All Corporate Authorised Representatives





Nigel Hart BCom, CFP  
Director and Head  
of Advisory Services

**Success in life often leads to financial complexity. Over time, you become connected to a range of advisers - accountants, stockbrokers, bankers and lawyers - each making vital contributions to your wealth management. However, without a well considered, over-arching plan, these inputs can be uncoordinated, leading to inefficiency, turbulence and risk.**

**Harts Financial Solutions starts with a clear strategy to strengthen, grow and protect your financial position. Once we have developed an effective action plan, we become the single, central collaboration point for all inputs in the service of your wealth management.**

**We stand beside you, actively guiding but not controlling your wealth management strategy. We maximise efficiencies, manage risks and ensure seamless collaboration with your other advisers.**

**We apply a robust science to your personal wealth management, giving you the confidence to concentrate on what started building your wealth in the first place.**

**Let Harts Financial Solutions help you take command.**

**Consider us your Private Wealth Pilot.**

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## Purpose of this Policy

The purpose of this policy is to outline Harts Financial Group Pty Ltd (HFG) and its Corporate Authorised Representative, Harts Financial Solutions Pty Ltd's policy in relation to the collection, storage, use, disclosure and other management of personal information.

## Overview

HFG is required to comply with the Australian Privacy Principles (APP) set out in the Privacy Act 1988 (Cth) (Privacy Act) and has developed a privacy policy, which details HFG's management of personal information that it collects from individuals.

Whenever changes are made to this Privacy Policy, a new version of the Privacy Policy will be available for download from our website <http://www.hartsfinancial.com.au/privacy>. Alternatively, a copy to be posted to you upon request.

## Information We Collect

We must collect personal information and, in some circumstances, sensitive information such as information about your health, in order to provide you with appropriate financial advice and process your investment decisions efficiently. We normally collect personal information directly from you but if you have consented, or would reasonably expect us to, we may collect personal information from a third party as well.

Generally, collection of your personal information will be effected in either face to face interviews, over the telephone, via email or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of these methods.

Examples of information required to be collected include:

- Employment details and employment history
- Details of your financial needs and objectives
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and prior claims, superannuation and estate planning
- Details of your investment preferences and aversion or tolerance to risk
- Information about your circumstances, family commitments and social security eligibility

We do not collect personal information about you if you only browse our websites, but do collect login details of registered users of our websites. In all other circumstances, our websites only use session cookies during a search query of the websites. When you close your browser the session cookie is destroyed and no personal information is kept which might identify you to us in the future.

## How That Information is Used

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial plan
- the provision of financial planning advice to you
- making securities and investment recommendations
- reviewing your financial plan
- reviewing securities and investment recommendations
- lodging or redeeming investments
- structuring your personal and/or business finance and banking facilities



We will not use or disclose personal information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure
- where you have consented to such disclosure
- where the APP's authorise use or disclosure where required or authorised under Australian law or a court/tribunal order, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We may use the personal information collected from you for the purpose of providing you with direct marketing material, however you may, by contacting us by any of the methods detailed below in the Contact Details Section, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

We may use the personal information collected from you for the purpose of providing a referral to one of the related companies within the HFG group or to other professional service providers you have requested. However you may, by contacting us by any of the methods detailed below in the Contact Details Section, request not to permit us to pass on such information and we will give effect to that request.

We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

In order to ensure that you receive a personal and tailored service, your personal information will be made available to other employees of HFG and its Representatives. It is a condition of our agreement with each of our employees that they adopt and adhere to this privacy policy.

Your information will be maintained by any employee of HFG and its Representatives in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below in the Contact Details Section.

## Consequences of Not Providing Information

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you. It may also mean that we cannot provide you with financial services or result in you paying more tax than may otherwise apply.

## Storage of Information

Your personal information is generally held in your client file. Information may also be held in our electronic workflow & software systems called Hplan.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All record movements off premises are recorded in our workflow systems. After hours access to our premises is controlled by security access. All computer-based information is protected through the use of access passwords on each computer. All data is backed up throughout each day and regular backup tape copies are stored securely off site.

In the event that you cease to be a client of HFG or its Representatives, any personal information which we hold about you will be maintained in a secure storage facility, and destroyed after an appropriate period of time that complies with legislative and professional requirements (usually 7-10 years).



## Access To Your Information

You may at any time, by contacting us by any of the methods detailed below in the Contact Details Section, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person
- providing access would have an unreasonable impact on the privacy of others
- the request for access is frivolous or vexatious
- the information related to existing or anticipated legal proceedings between us, and would not be discoverable in those proceedings
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- providing access would be unlawful
- denying access is required, or authorised by or under law
- providing access would be likely to prejudice certain operations by, or on behalf of an enforcement body, or an enforcement body requests that access not be provided on the grounds of national security,
- giving access would reveal evaluative information generated by HFG in connection with a commercially sensitive decision-making process.

We will endeavour to respond to any request for access within 14 to 30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

## Correction of Information

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below in the Contact Details Section and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

## Complaints

Please direct all privacy complaints to our Privacy Officer in the first instance. Privacy complaints will normally need to be made in writing.

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to your personal information. This could include matters such as:

- (a) if you believe <<insert name>> has breached the APP's, a binding registered APP code or any other relevant obligations under the Privacy Act with respect to your personal information;
- (b) how your personal information is collected;
- (c) how your personal information is stored;
- (d) how your personal information is used or disclosed; or
- (e) how access to your personal information is provided.

At all times, privacy complaints will:

- (a) be treated seriously;
- (b) be dealt with promptly;
- (c) be dealt with in a confidential manner; and
- (d) not effect your existing obligations to the commercial arrangements that exist between HFG and you.

The Privacy Officer will commence an investigation into your complaint and will respond to the complaint within a reasonable period of time. You will be informed of the outcome of your complaint following the completion of the investigation. In the event you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

## Internet Sites

Our web sites contain links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

Our web sites may utilise cookies which allow us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our sites. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet Service Provider should be able to assist you to set your preferences.

Please refer to our web site at <http://www.hartsfinancial.com.au/terms> for details of our terms of use and privacy statement relating to the Internet.

## Additional Privacy Information

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

## Contact Details

**Attention:** Privacy Officer  
**Address:** Harts Financial Solutions  
PO Box 1809, SUBIACO, WA, 6904  
**Telephone:** 08 6380 7900  
**Fax:** 08 6380 7950  
**Email:** [compliance@hartsfinancial.com.au](mailto:compliance@hartsfinancial.com.au)





Suite 6, Ground Floor, 388 Hay St, Subiaco WA 6008  
PO Box 1809, Subiaco WA 6904  
T: 08 6380 7900 F: 08 6380 7950  
E: [info@hartsfinancial.com.au](mailto:info@hartsfinancial.com.au) W: [www.hartsfinancial.com.au](http://www.hartsfinancial.com.au)

Harts Financial Solutions Pty Ltd (ABN 36 128 904 521)  
is a Corporate Authorised Representative of  
Harts Financial Group Pty Ltd (ABN 80 128 903 962 AFSL 324390)

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