

## PRIVACY POLICY

Belay Advisory Pty Ltd, Belay Wealth Pty Ltd and Belay Advice Pty Ltd (Belay Advisory) is committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

In this Privacy Policy, 'Belay Advisory', 'we', 'us' and 'our' refers to any entity owned or controlled by a Belay Holdings Pty Ltd and/or Belay Advice Pty Ltd.

### What personal information do we collect and hold?

We collect personal information from you in a variety of ways, including when you interact with us electronically or in person. This includes, but is not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference(s), respond to surveys and/or promotions, provide financial or credit card information, or communicate with us.

Sometimes you may provide us with someone else's personal information, e.g. other members of your family group. You must not do this unless you have their consent to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

We may also collect your information from third parties such as your bank, super fund or investment provider, legal professional, mortgage broker and/or other professional advisers.

The information we collect can include a broad range of information from your name, address, contact details and age to information about your personal affairs including assets and liabilities, employment information, tax file numbers and passport or driver's licence.

We only collect sensitive information such as information about health with your agreement and it is necessary for us to do so to provide our services effectively.

### How do we use your information?

Belay Advisory and our associated entities will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as business, tax and/or wealth management services. We may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), monitoring and improving our website, keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

From time to time we will use your contact details to send you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. We may also send you regular updates by email or by post. We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

We are entitled to use your Personal Information for any purpose which is related to the purpose for which it was originally provided.

### **What if you don't provide information to us?**

If you do not provide us with some or all the information that we ask for, we may not be able to provide our services comprehensively and to the standard which you may expect. In most cases our services won't be finalised until the required information is obtained.

### **Web and mobile data**

We may use technology such as cookies, beacons, tags, scripts and tracking pixels to collect, store and use anonymous data about how you use our website / mobile technology. This includes your server address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data is used to increase functionality and can also enable us to display information and content that is tailored to our understanding of your interests. This information alone cannot be used to discover your identity.

### **How do we store and protect your personal information?**

We strive to maintain the relevance, accuracy and completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal reporting or document retention requirements.

We will store your personal information in files within secure office premises, as well as electronically on secure servers and within our software. We have security and privacy measures in place to ensure the integrity of your personal information and to protect it from misuses, interference and loss, and from unauthorised access, modification or disclosure.

Where we hold information that we no longer require for any purpose and it is not required to be maintained by Australian law, we will take reasonable steps to destroy the information or ensure that the information is deidentified.

### **Will we disclose your personal information to anyone?**

We do not sell, trade, or rent your personal information to others. We may disclose your information to the following parties:

- Internal staff members
- External compliance contractors for the purposes of auditing our advice
- Product issuers with whom we are engaging on your behalf
- Solicitors and other professionals to whom you consent to disclose your information for the purpose of providing services to you related to our engagement

We may provide your information to others if we are required to do so by law or under some other unusual circumstances which the Privacy Act permits.

Belay Advisory may transfer or store your personal information outside Australia if we engage with, or are required to send personal information to, an overseas entity to fulfil the purpose for which the personal information was collected (or a related or ancillary purpose).

If we do disclose personal information to an overseas recipient without your consent, we will take reasonable steps to ensure that this recipient does not breach the Australian Privacy Principles or a similar applicable law in relation to that information.

### **How can you check, update or change the information we are holding?**

You may ask us for access to your personal information and to correct it at any time.

Upon receipt of enough information to allow us to identify the information, we will tell you what personal information we hold about you. We will also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

To access or correct your personal information, please write to [hello@belay.com.au](mailto:hello@belay.com.au). We may charge a reasonable fee to cover our costs.

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

### **What happens if you want to complain?**

We welcome your questions and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to us at [hello@belay.com.au](mailto:hello@belay.com.au).

We will consider your complaint through our internal complaints resolution process and we will try to respond with a decision within a reasonable timeframe.

### **Your consent**

By asking us to assist with your affairs you consent to the collection and use of the information you have provided to us for the purposes described above.

### **Updating this policy**

This Privacy Policy was prepared on 1 July 2020. We may update it at any time. The new version will be published on our website.