



# **Privacy Policy**

Balance Aged Care Specialists Pty Ltd
ABN 84 613 041 704

Effective Date: 1st January 2024

This document outlines Balance's policy on handling the personal information that we collect about individuals including customers, potential customers and shareholders.

We are committed to protecting your privacy. When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with. At all times, we comply with the terms of this privacy policy when handling your personal information. This policy answers the following questions about privacy at Balance Retirement & Aged Care Specialists:

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About this policy

#### Why do we need your personal information?

Understanding and meeting our customers' financial needs over the course of their lifetime in retirement and aged care is a central part of our business. We do this by providing services to enable our clients to make informed & effective decisions. To do this effectively, we need to collect certain personal information.

In this policy, personal information is any information that could identify you or be used to establish your identity. We collect, hold, use and disclose customers' personal information so we can establish, manage and administer the services provided by us, and comply with legal and regulatory obligations. We may also use and disclose your information for purposes related to those mentioned above, such as:

- Assisting with your questions and complaints.
- Arranging for services provided by a third party.
- Enhancing our customer service and product options (see the section 'Will my personal information be used for direct marketing?').
- Internal operations, such as record keeping, data analytics, auditing and/or training.

#### Will my personal information be used for direct marketing?

We use and disclose your personal information to keep you informed about the range of services offered by us and to send newsletters regarding the changes to Centrelink or Department of Veterans Affairs (DVA) Pensions & Aged Care Fees. You can opt out of receiving direct marketing information from us at any time (for more information, see the section 'How can you contact us about privacy?').

# What happens if I do not provide information that has been requested?

It's your choice whether to provide your personal information. If you decide not to provide personal information, we might be unable to fulfil your request for a specific service or be unable to identify you to protect you against fraud.

#### What types of personal information do we collect?

We may ask for a range of personal information to assist us in providing you with relevant services. The information we may request can include, but not limited to:

- Name
- Resident and Postal Address
- Date of Birth
- Contact details

- Income, Assets and Liabilities
- Account Balances
- Tax and Financial statements
- Health Information
- Employment details
- Domicile and Citizenship Status.

#### Will we collect sensitive information?

Sometimes we need to collect and use sensitive personal information such as health information when we consider the appropriateness of the aged care strategy, to your estate planning, tax situation, financial situation, so that can warn you of our concerns about potential conflicts that may arise.

If we need to obtain, use and disclose this type of information, we will ask for your consent, except where disclosure is permitted by law.

#### How do we collect personal information?

Most of the personal information we collect will be directly from you. We gather this information through communication with you, whether in person, by telephone, via email, completion of forms or by correspondence. We collate and record this information to create a file and keep it stored. We can also gather through other forms of communication such as CCTV footage.

In some cases we might collect your personal information from external sources. Examples of the people or organisations that may provide us with information are:

- employers, when a new employee joins their superannuation or insurance plan.
- children or guardians in respect of parents, or relatives or others who they may be acting on their behalf
- persons authorised by you (such as lawyers or accountants)
- third-party brokers (such as insurance and mortgage brokers)

We only collect your information from external sources if it is impractical to collect it directly from you, or when we are permitted to do so.

# Can you remain anonymous or use a pseudonym when dealing with us?

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However, in many cases it will not be possible

for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

#### How do we protect your personal information?

Whether your personal information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet or other methods, we take steps to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats. We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff and aged care consultants who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

When we don't need your personal information anymore, we will delete, destroy or de-identify it.

#### Who do we share personal information with?

Balance may share your personal information with other entities both within and outside of the Balance Group of Companies. The entities that we might share your personal information with vary according to the service involved, but could include:

- other areas and organisations within the Balance group that provide financial and other services, for reasonable business purposes
- financial advisers, brokers and other parties authorised or accredited by Balance
- service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance or research services, some of whom may contact you on our behalf
- courts, tribunals and other dispute resolution bodies in the course of a dispute
- credit reporting or reference agencies or insurance investigators
- government or semi Government instrumentalities (eg Centrelink/ DVA, ATO, Dept. of Health
- anyone authorised by you or to whom you have provided your consent (either expressly
  or impliedly), including but not limited to other financial services providers that we may
  need to deal with on your behalf
- anyone to whom we, or our service providers, are required or authorised by law to
  disclose your personal information (for example, law enforcement agencies, and national
  and international government and regulatory authorities including but not limited to the
  Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian
  Securities and Investments Commission, the Australian Transaction Reports and Analysis
  Centre and the United States Internal Revenue Service)
- other financial services institutions in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

## Do we send personal information to overseas recipients?

No, we do not.

#### How do we update your personal information?

We will update your personal information if you contact us. In most cases you can update your personal information over the phone or via our website. We may update your personal information if we believe the personal information we hold is incomplete, incorrect or out of date, we could seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

#### How can you contact us about privacy?

You can contact us via:

- Telephone on 1300 556 287
- Email to info@bfs.net.au
- Mail to the following address:

Balance Retirement & Aged Care Specialists. Suite 309/5 Celebration Drive BELLA VISTA NSW 2153

You can talk to our staff any of the following in relation to privacy:

- seek more information about anything contained in this policy, or to request a printed copy of this policy.
- update or correct your personal information.
- opt out of receiving direct marketing material.
- ask about accessing or correcting the personal information we hold about you.
- make a privacy related complaint.

### How do you find out about your personal information we hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us (see 'How you can contact us about privacy'). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time. There are some situations where we are allowed to refuse or limit your access to information, for example when the information is commercially sensitive. If that happens, we'll write to you and let you know why.

There is no charge for making a request to access your personal information. In some

circumstances there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed before completing this task.

#### How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed at the start of this section. We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. In most cases, we'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

#### How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated. This can be done by sending correspondence addressed to the following:

The Principal
Balance Retirement & Aged Care Specialists
Suite 309/5 Celebration Drive
BELLA VISTA NSW 2153
AUSTRALIA

or by email to <u>info@bfs.net.au</u>, addressed to The Principal. Alternatively, you can contact an external body.

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner by calling 1300 363 992 or find them online at <a href="http://oaic.gov.au/">http://oaic.gov.au/</a>
- If your complaint is about the products and services we provide you can contact
   Australian Financial Complaints Authority (ACFA) on 1800 931 678 or find them online at
   <a href="http://acfa.org.au/">http://acfa.org.au/</a>

# What about privacy and the internet?

This statement is specific to the Balance (<a href="http://balanceacs.net.au/">http://balanceacs.net.au/</a>) website.

#### What are cookies and how do we use them?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our website, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website. Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

#### Links to third-party websites

Our websites have links to external third-party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to Balance's privacy standards and procedures.

### Website analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from our websites, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites. You cannot be identified personally from this information and no personal information is stored about you.

#### About this policy

This policy is effective as of 1st January 2024. We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy or contact us for a printed copy.

This policy incorporates the relevant provisions of the Privacy Act and the Australian Privacy Principles.