

Group Privacy Policy

1. Purpose

We are committed to protecting privacy and confidentiality in accordance with the Australian Privacy Principles ('APPs'), Credit Reporting Privacy Code and Privacy Act 1988 (Cth) ('Privacy Act'), and it is one of our prime responsibilities, that any personal or sensitive information provided to us is not used for any other purpose than that of which is intended and expected.

This policy explains how we will use and manage your personal information. It also describes in general terms, how personal information is collected, the sorts of personal information held as well as the purposes for which it may be used and disclosed.

We will review and update this policy from time to time to make sure it remains appropriate should there be a material change to our business operations or law. We reserve the right to notify you by posting an updated version of the policy on our website. We will be governed by the most current Group Privacy Policy regardless of whether or not we have given you specific notice of any change.

2. Scope

This Privacy Policy applies to First Financial Pty Ltd trading as Whittle & Skok. In this Privacy Policy, 'we', 'us', or 'our' have the same meaning and refers to First Financial Pty Ltd trading as Whittle & Skok.

3. The kinds of personal information that we collect

As a financial planning organisation, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you.

We may collect the following types of personal information:

- Name;
- Email address, mailing or street address and other contact details;
- Date of birth;
- Driver's licence number details;
- Tax file number;
- Bank account details to enable payment of distributions or redemptions;
- 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 superannuation;
- Information about other products or services that you may use or hold
- Details of your investment preferences and aversion or tolerance to risk;

We are required to collect your name, address, date of birth and other verification information under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

We are authorised to collect tax file numbers under tax laws and the Privacy Act.

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request and it may also affect our ability to properly analyse your personal circumstances and provide appropriate advice to you.

As we are required pursuant to the Corporations Act and Rules of Professional Conduct of the Financial Advice Association of Australia to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients, if you elect not to provide us with the personal information referred to above, we be unable to provide you with additional advice or terminate our ongoing advice relationship with you if we believe we are unable to provide you with a complete service.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

4. How we will collect personal information

Generally, collection of your personal information will be directly from you, effected in either face to face interviews, over the telephone 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 those methods.

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

- Persons authorised by you (such as accountants or lawyers)
- Third-party brokers (such as insurance and mortgage brokers)
- Employers and superannuation funds (as authorised by you)

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

We may also collect personal information about you from a third party, such as electronic verification services, referrers, and marketing agencies. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

Website collection

We collect personal information when we receive completed online generated forms from our website whittleskok.com.au or other third-party providers. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. You can view and access our Website Privacy Policy by clicking on the privacy button on our website.

To use our website, you must consent to our use of cookies. Please note that if you set your browser to refuse cookies, you may not be able to use all the features of our website.

Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information. Cookies are small text files which are transferred to your

computer's hard drive through your web browser that enables our website to recognise your browser and capture and remember certain information.

We use cookies to understand how users interact with our website, to compile aggregate data about our website traffic, including where our website visitors are located, and interaction so that we can offer better user experiences.

We also use analytics on the site. We do not pass any personally identifiable information through this function, however, the data we collect may be combined with other information which may be identifiable to you.

Artificial Intelligence (AI)

We may use AI tools as part of the services we provide to you. Where this is the case, we take reasonable steps to ensure we safeguard your privacy, security, and comply with the APPs and Privacy Act.

Generally, the AI tools we use do not hold or store your information permanently, and instead your information may be accessed temporarily and held in secure, approved environments while being processed. When using commercially available AI products, we ensure that the privacy obligations apply to any personal information input into an AI tool, as well as the output data generated by AI where it contains personal information.

Due diligence is conducted on all AI tools to ensure they are suitable for the intended uses, including considering potential privacy and security risks, and who will have access to personal information.

We will not enter your personal information into publicly available AI tools.

5. The purposes for which we collect personal information

We are required by law to collect information to identify and verify you. We therefore may make enquiries as to your identity and other personal details as required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006.

Other than as required by law, 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 as requested by you or from time to time as we believe appropriate;
- Making securities and investment recommendations;
- Reviewing your financial plan;
- Reviewing securities and investment recommendations;
- Provide you with information we believe may be relevant or of interest to you;
- Let you know about other products or services we offer, send you information about special offers or invite you to events;
- The potential dissemination of information to a new Financial Services Licence in the event a representative changes to a new licence in accordance to terms of their employment.

6. Dealing with personal information

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; or
- Where you have consented to such disclosure; or
- Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may disclose personal information to:

- a related entity;
- an agent, contractor or service provider involved in providing the financial advice you have requested, which may include ongoing service, such as financial product issuers and paraplanners.
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting insurance, research, legal, debt collectors, administrative and back-office support, other advisers, IT or other business services;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers;
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

Generally, we use systems and services located within Australia. From time to time, we may send your information to recipients located overseas, including to related parties and service providers or other third parties who operate or hold data outside Australia. We may also send information overseas to complete a particular transaction or matter where this is required by the laws and regulations of Australia or another country.

Where your information is sent overseas, it is likely to be one of the following countries:

- Philippines
- Vietnam
- United States

- Indonesia
- Malaysia

It is not practical to list all the countries in which personal information is likely to be disclosed, however, when we send your personal information to overseas recipients, we make sure :

- we have taken reasonable steps to ensure that the recipient does not breach Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- appropriate data handling and security arrangements are in place.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the Australian Privacy Principles, 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.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us, request not to receive such information and we will give effect to that request. Please use the contact details at the end of this policy if you wish to opt-out of receiving marketing communications from us.

Please note that, if we are currently providing you with services or products, we will still need to send you essential information about your account, the relevant services or products and other information as required by law.

To ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or representatives who will be your primary point of contact within the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

If we propose to sell our business or merge with another business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence, and it will be a condition of that disclosure that no personal information will be used or disclosed by them. If a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

7. How we keep personal information secure and current

Your personal information is generally held in your client file and in a computer database.

We will always 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. Any paper files are stored in secure areas and access to our premises is controlled. All computer-based information is protected using access passwords on each computer and screen saver passwords. We also use security procedures such as firewalls and anti-virus technology to prevent unauthorised access. Data is backed up each evening and stored securely off site.

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 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.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure storage facility for a period of at least 7 years to comply with legislative and professional requirements.

8. Accessing your personal information

You may at any time, by contacting us, request access to your personal information and we will reasonably 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. If the information sought after is extensive we may charge a fee to cover cost.

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 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.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

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

9. 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.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of

their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

10. Anonymity

We do not give you the option of dealing with us anonymously, or under a pseudonym. This is because it is impractical, and, in some circumstances, illegal for us to deal with individuals who are not identified.

11. Privacy enquiries and complaints

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Compliance Manager. We request that complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint. Your complaint will be considered within 7 days and responded to. We will inform you whether we will conduct an investigation, the name, title, and contact details of the investigating officer and the estimated completion date for the investigation process. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

First Financial Pty Ltd trading as Whittle & Skok – Contact Details

First Financial Pty Ltd – Compliance Manager

Postal Address: GPO Box 528, Melbourne, VIC 3001

Telephone: 03 9909 5800

Email: contactus@firstfinancial.com.au

Office of the Victorian Privacy Commissioner

Director of Complaints, Office of the Australian Information Commissioner

Post: GPO Box 5288, Sydney NSW 2001

Telephone: 1300 363 992

Facsimile: 02 6123 5145

Website: <https://www.oaic.gov.au>

Online submission: <https://webform.oaic.gov.au/prod?entitytype=Enquiry&layoutcode=EnquiryWF>