

Pivotal Privacy Policy

This privacy policy sets out the information handling practices of Pivotal Financial Advisers Limited (Pivotal).

Pivotal is a professional provider of financial planning advice and implementation services. We may be contacted at 80 Alfred Street, Milsons Point, NSW, 2061 or by telephone on (02) 9954 0325.

1. Why have a privacy policy?

The purpose of this policy is to communicate the way in which Pivotal handles personal information. This policy is intended to give you an understanding of the sort of personal information we collect, hold and disclose and how we handle that information. Pivotal considers it important to protect your personal information in accordance with privacy legislation, including the National Privacy Principles within the Privacy Act 1988 (Cth). This policy is technology neutral and applies to all forms of communication.

2. What is personal information and what is sensitive information?

Personal information is information or opinion that allows others to identify you. It includes your name, age, gender, contact details, as well as your health and financial information. We collect personal information to provide you with the financial advisory services you request as well as information on other products and services offered by or through us. The law also requires us to collect personal information in a number of circumstances such as to process applications and to provide superannuation and insurance services.

Sensitive information includes information or opinion about an individual's health information, genetic information and sexual preferences and practices. For some of the services offered by Pivotal, such as arranging life, trauma and income protection, this information may be required.

3. Why and how does Pivotal collect and use personal information?

Personal information may be collected, used and disclosed to Pivotal for the following purposes:

- to comply with our legal obligations;
- to establish and administer our customer relationships;
- to provide customers with the products and services they request;
- to assist customers with queries;
- to monitor and evaluate products and services;
- unless they tell us otherwise, to provide information on products and services offered by Pivotal, affiliated product and service providers, and external product and service providers with whom we have a business arrangement. If you have provided us with your email or mobile phone details, we may provide information to you electronically with respect to those products and services;
- to gather and aggregate information for statistical, prudential, actuarial and research purposes; and
- to take measures to detect and prevent fraud.

In most instances, we collect your personal information from you when you fill out a Data Collection form, an application form or personal statement, but we may also collect information from you which you provide to us over the telephone or internet. In some situations, we may also collect your personal information from a third party, such as your employer or employer's adviser for corporate members, your health professional or accountant, or any other party with which we have an arrangement for the promotion and sale of products and services offered or distributed by us.

When we have collected your personal information, we use it to provide you with a product appropriate to your needs. For example, your health information is used to assess the risk in providing you with a product, and the pricing of that product. Your financial information is used to determine the insurance cover appropriate to you and your circumstances and the extent to which Pivotal can assist.



4. What personal information do we collect?

Personal information collected by Pivotal generally comprises the following:

- name,
- address,
- date of birth,
- gender,
- marital status,
- occupation, and
- contact details (including telephone, facsimile and e-mail).

Sometimes we collect a few personal details unlikely to be known to other people to help us identify you over the telephone. We may monitor and record telephone calls for training and security purposes.

Depending on the product or service offered by Pivotal we may collect the following:

- the number and ages of your dependants,
- the length of time at your current address,
- your employer's name and contact details,
- the length of your employment,
- proof of earnings,
- if you have changed employer in the last few years, details of your previous employment,
- financial information including your financial needs, objectives & current financial details,
- transaction information relating to any investment product or service we provide to you, such as details of contributions and distributions; and
- retirement plans.

If you are applying for life, trauma, or income protection insurance we may also collect the following:

- medical information that relates to the insurance
- lifestyle information that relates to the insurance

This information may include your sexual activity and is collected so we may assess whether to accept your insurance proposal and, if so, on what terms.

5. When does Pivotal disclose personal information?

Depending on the product or service you have, Pivotal may also disclose some of your personal information to other parties such as the following:

- For corporate members, your employer or employer's adviser;
- For members of superannuation funds to the trustee or administrator of the superannuation fund;
- Affiliated product and service providers;
- Auditors we appoint to ensure the integrity of our operations;
- Any person acting on your behalf, including your solicitor, accountant, executor, administrator, trustee, guardian or attorney;
- If required or authorised to do so, regulatory bodies and government agencies;
- Claims assessors and investigators, claims managers and reinsurers (so that your claim can be assessed and managed);
- Medical practitioners (to verify or clarify, if necessary, any health information you may provide); and
- Other organisations which in conjunction with us provide products and services (so that they may provide their products and services to you).

Like other financial service companies, there are situations where Pivotal may also disclose your personal information in circumstances where it is:

- Required by law (such as to the Australian Taxation Office); and
- Authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests).

We also use the information we hold to help detect and prevent illegal activity. We co-operate with police and other enforcement bodies as required or allowed by law.

Where we hold your personal information in conjunction with that of another individual or individuals (e.g. where you jointly hold a policy), we will allow each individual access to their own personal information and to the joint information (e.g. premium payments and status of policy) but not to the personal information of the other individual(s).



We disclose personal information when we outsource certain functions, including bulk mailing, direct marketing, debt recovery and information technology support. In all circumstances where personal information may become known to our contractors, agents and outsourced service providers, there are strict confidentiality arrangements in place. Contractors, agents and outsourced service providers are not permitted to use or disclose personal information for any unauthorised purposes.

6. Access

Under current privacy legislation, you are generally entitled to access the personal information we hold about you. If you wish to access your personal information, we ask that you put this request in writing. This process will assist us in identifying you and will also assist us by identifying your policy number/s and the type of information to which you are requesting access.

We will respond to your Request for Access request as soon as possible and aim to comply with your request within 30 days. The time we require to process your request will depend upon the type of information you have requested. In certain circumstances, you may not be entitled to access the personal information we hold about you. For example, you may not be able to access the personal information held about you if providing you with access would unreasonably interfere with the privacy of others. If this happens, we will give you reasons as to why we are unable to provide you access. An access charge may apply, but not to the request itself.

7. Identification

We are required by law to identify you in some circumstances, such as prior to giving advice to you. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non photographic documents) in order to meet the standards set under those laws.

We may take steps to verify the information we collect; for example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in a claim for income protection is accurate.

8. Changes to your personal information

Our goal is to ensure that the personal information we hold is accurate, complete and up-to-date. Please contact us if any of the details you have provided change. Please also contact us if you believe that the information we have about you is not accurate, complete or up-to-date.

9. Withdrawing consent

Having provided consent for the collection, use and disclosure of your personal information, you are able to withdraw it at any time. To withdraw consent, please contact us and note that withdrawing your consent may lead to Pivotal no longer being able to provide you with our services.

10. Personal information security

We are committed to keeping secure the personal information you provide to us. We take all reasonable precautions to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure. We have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them. Our security measures include, but are not limited to:

- educating our staff as to their obligations with regard to your personal information;
- requiring our staff to use passwords when accessing our systems;
- encrypting data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks;
- employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- providing secure storage for physical records; and
- employing physical and electronic means such as alarms and cameras (as required) to protect against unauthorised access to buildings.



11. Marketing

Personal information is shared between Pivotal and other companies with which it has a business relationship. They may provide you with information on their products and services which we consider may be of interest to you.

Pivotal discloses your personal information to a number of its related bodies corporate which assist us in providing you with products or services. Pivotal may disclose some of your personal information to external organisations who assist us in administering the provision of the products or services to you. For example, mailing houses, which send you your annual statement or other organisations with which we have an arrangement for the promotion and sale of products or services offered by us. If you do not want your personal information to be used in this way, please let us know.

We may also use personal information held about you to keep you informed of new products or special arrangements offered or distributed by us, or other organisations with which we have a business relationship, or to conduct marketing activities, and may disclose information about you to our service providers for this purpose.

To opt-out of receiving marketing information altogether, please contact us.

12. Complaints Process

Pivotal has a formal complaint handling policy. If you wish to make a complaint about a possible breach of privacy, you should contact our privacy officer:

Pivotal Financial Advisers Limited
Att: Privacy Officer
PO Box 142,
Milsons Point NSW 1565
Telephone: (02) 9954 0325

13. More information and questions

Information about the privacy rights of individuals and privacy obligations imposed on organisations is available on the website of the Federal Privacy Commissioner at www.privacy.gov.au

If you have any questions or would like further information on Pivotal privacy and information handling practices, please contact us.

14. Cookies

A 'cookie' is a packet of information that allows the server (the computer that houses the web site) to identify and interact more effectively with your computer. When you use one of our web sites, we send you a cookie that gives you a unique identification number. A different identification number is sent each time you use one of our web sites. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider (ISP). You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our web sites. To evaluate the effectiveness of our web site advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions.

15. Links to other websites

Our web sites may contain links to web sites that are not owned or controlled by Pivotal. Whilst such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours.

16. Changes to this Privacy Policy

We reserve the right to review and amend this Privacy Policy from time to time, particularly to take into account any changes to legislative or regulatory requirements. Updated versions will be made available on our website or are available on request.

