

At Advance your privacy is important to us. This privacy policy explains how we collect personal information and how we maintain, use and disclose that information. It also provides some detail about your privacy rights along with our general rights and obligations and our policy in relation to the personal information we keep on record.

## **Other privacy statements**

When you apply for a new product or service, the application includes notices about privacy and requests for consent. Those privacy notices (called privacy statements) specify in more detail how any information about you may be used and disclosed in relation to the particular product or service.

If you're an investor, when you apply for or use one of our products or services, you consent to us collecting, maintaining, using and disclosing personal information about you (provided by you or by another person) in accordance with the privacy statement in the application and this policy.

If you're an adviser, by recommending our products or services, you consent to us collecting, maintaining, using and disclosing personal information about you (provided by you or by another person) in accordance with the privacy statement included with the application and this policy.

This privacy policy does not apply to parties that may be linked or associated with our website, [advance.com.au](http://advance.com.au). Those website owners are responsible for the privacy of the information they collect and should be contacted directly for details of their privacy policies.

## **What information does Advance hold?**

The types of information we keep on record will depend on the type of product or service requested by an investor or recommended by an adviser.

Generally, we keep a record of one or more of the following types of information about you.

### **For investors**

- If you apply for a superannuation or other investment product or service, information about your employment, beneficiaries, bank accounts for funds to be transferred to or from and, in some cases, health information about you.
- Transaction information relating to the product or service acquired by you, such as details of payments of contributions, units on issue and capital and income distributions for investment products.
- If you apply for insurance, information about what is being insured, including health information about you, your income and occupation, information about your beneficiaries and information about your claims history.

- If you have a financial adviser, information in connection with your relationship with your adviser.

#### **For advisers**

- Information about products or services provided by any member of the Westpac Banking Corporation (Westpac) Group of companies or our preferred providers acquired by your clients through you or about which we have sent you information in your business capacity.
- Information in connection with your relationship with your clients.

#### **For investors and advisers**

- Information that identifies you, such as your name and address and other information provided by you and people nominated by you.

All information sought is required for our business purposes, which are detailed generally in this privacy policy and more specifically in our application forms or on the web pages which allow you to contact us.

We don't actively seek to collect sensitive information (for example health information or information about any criminal record), unless it's necessary for our business purposes. If we do need to collect sensitive information, we'll only collect, use and disclose it in accordance with privacy laws. Sometimes we act as an agent for others when collecting information about you, such as for our preferred insurance companies. We'll tell you when we do this.

#### **How Advance collects information from its website**

We collect and hold information about you when you:

- complete an online application or other type of form
- provide us with your email address
- access and use our services through our website.

We also collect some statistical information about visitors, from our website (for example, the number of visitors, pages viewed, types of transactions conducted, time online and documents downloaded). Some of this statistical information is collected by using cookies. A cookie is a small data file or simple piece of text, websites use to write to your hard drive when you visit them. It can't be used as a virus and can't access your hard drive. A cookie file can contain information such as a user ID which a website will use to track the pages you visit, but the only personal information a cookie can contain is information which you supply yourself. We use this information to evaluate our website performance (including identifying potential performance problems) and continually improve our services. None of the statistical information we prepare from information using cookies identifies individual visitors to our website.

Other than statistical information, we don't collect any information about you through our website unless you provide the information to us.

### **How Advance generally collects your information**

Generally, we only collect personal information about you from you, unless it is not reasonable or practical for us to do so, or you consent. For example, you may authorise us to collect information from a third party, like your accountant, adviser or client, or you may be named as a beneficiary in another application for one of our products or services. We may also collect information about you from other members of the Westpac Group or from publicly available sources such as company registers or land title registries.

### **How may Advance use your personal information?**

We use personal information about investors and advisers in the following ways.

- To help us process investors' applications for our products or services and subsequent investment directions (including processing any commissions payable to the adviser).
- To assist with investors' financial planning needs.
- To effectively manage and administer all products and services we provide to investors (including keeping records required under superannuation laws and the Corporations Act).
- To assess, process and investigate claims made under any insurance products investors obtain through us.
- To help us form views about how we can improve our relationship with you.
- To ensure our internal business operations are running smoothly which may include fulfilling legal requirements and conducting confidential systems maintenance and testing.

When we request your information, we may give more specific details about the way we use your information.

### **What rights does Advance have to disclose personal information?**

Generally, we must obtain your consent before we tell anyone about you, or your investments. You can give us your consent expressly (by telephone or writing to us) or it may be implied by your conduct.

Sometimes the law requires or allows us to give out information about you. For example, we must tell the Australian Tax Office how much interest we pay you. Another example is giving your account details to a court if we're ordered to do so under a subpoena.

Depending on our relationship with you, if it's necessary we may also disclose your personal information under the following circumstances.

- If you're an investor, to anyone who holds amounts on your behalf which will be transferred to or from us.
- If you're an adviser, to your dealer group.
- To our external service providers (which may be located overseas) that provide services to us. This is on a confidential basis and includes organisations which provide us with advisory and administration services, such as investment managers, and mailing houses and back office services.
- To anyone who provides an investor with insurance obtained through us.
- To anyone acting on your behalf, for example solicitors, accountants, and for investors, your financial advisers (including their dealer group) and any information service accessed by the financial adviser.
- To any party acquiring an interest in any business.
- To anyone who holds amounts on your behalf which will be transferred to or from us.
- To any complaints body to whom a complaint relating to a product or service is referred.
- Where the law requires us or permits us to do so.
- If you consent.

We may at other times give you more details about our disclosure practices in relation to specific products or services – for example on the forms we use to collect personal information about you.

### **How the Westpac Group may use your personal information**

Your personal information may also be used by us or other members of the Westpac Group to help assess your total relationship and product holding within the Westpac Group, analyse products and services, evaluate the needs of our customers, develop new products and to provide us with administrative and advisory services.

Unless you inform us or have previously told us not to, we may also provide access to your personal information (excluding health information) to members of the Westpac Group or use that information ourselves to inform you of products and services offered by any member of the Westpac Group or preferred organisations which we think may be of interest or value to you.

### **How Advance protects the security of your information**

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure.

We have physical, electronic and procedural safeguards to protect your information which is held by us. For example, your personal information is stored in secured office premises, in electronic

databases requiring logins and passwords for access and/or at one of our secured warehouses. Access to information stored electronically is restricted to staff whose job purpose requires access. We require all staff to maintain the confidentiality of customer information.

We use secure methods to destroy or de-identify any personal information as soon as the law permits, provided the information is no longer needed by us for any purpose. Ordinarily, for information about a particular account, we destroy the information seven years from the date you close the account.

### **Changes to our privacy policy**

We may amend this policy from time to time. Not all changes to our privacy policy will require your consent, for example where office security procedures are changed.

We'll notify you of any change to our information handling policy that requires your consent before being implemented.

### **What are your rights?**

Unless required by law (for example to comply with a legal duty of disclosure when applying for an insurance policy) you don't need to give us any of the personal information about you or any other person which may be requested in our communications with you. However, without that information, we may not be able to process an application, fulfil your request or provide you with an appropriate level of service.

### **Marketing opt-out**

If you don't want the benefit of receiving information, special offers or exclusive opportunities about products and services (which may be supplied by us or any member of the Westpac Group or preferred suppliers) which we think may be of interest or value to you, then please tell us. You can do this at any time by writing to us or telephoning us at the contact details listed on the Contact us page of [advance.com.au](http://advance.com.au).

### **Access to your information**

You can request access at any time to personal information we hold about you. We'll process your request within a reasonable time, usually 14 days. More time may be needed, depending on the nature of the request.

There's no fee for requesting access to your information, however we may charge you the reasonable cost of processing your request.

Sometimes we're not required to provide you with access. If we refuse you access to your personal information, we'll tell you the reason why. If we're not required to provide you with access to the information requested, we'll consider, if reasonable, whether the use of a mutually agreed intermediary would allow sufficient access to meet your needs and ours.

## **Correction of information**

We try to ensure that all information we hold about you, which we collect, use or disclose is accurate, complete and up-to-date. You must promptly notify us if there are any changes to your personal information.

You may ask us at any time to correct personal information held by us about you, which you believe is incorrect or out-of- date. We'll deal with your request within a reasonable time.

If we disagree about the accuracy of the information, you may request we make an appropriate notation in relation to that information, noting that you consider it isn't accurate, complete or up-to-date.

If there's anything you'd like to discuss, please call our Contact Centre on 1800 819 935.

If you have any questions, concerns or complaints about our privacy policy or practices, or would like more information about the privacy policy of any other member of the Westpac Group, please contact us in writing, by telephone or by email.

We'll try to answer any questions you may have, correct any error on our part or resolve any complaint about our information handling practices. If we don't resolve a complaint to your satisfaction, you also have the right to complain to the Privacy Commissioner. We will provide you with the Privacy Commissioner's contact details if required.