



Walshs Holdco Pty Ltd (ACN 697 835 984) and its related bodies corporate, including:

- Walshs Wealth Management Pty Ltd ABN 31 683 066 015
- Walshs Financial Planning Pty Ltd ABN 82 122 293 912 AFSL 432636
- Walshs Finance Pty Ltd ABN 11 168 809 523
- Walshs Accounting & Taxation Pty Ltd ABN 68 616 083 204
- Walshs Management Pty Ltd ABN 39 686 164 376, and
- Creek Street Asset Management ABN 26 631 745 698;

collectively referred to as 'Walshs', 'we', 'our', 'us', are bound by the Privacy Act 1988 (Cth) ('the Privacy Act'), including the Australian Privacy Principles ('APPs'), as amended from time to time, and recognise the importance of ensuring the confidentiality and security of your personal information

What is the purpose of this policy?

This policy provides you with information about:

- The personal information that Walshs collects about you
- How we handle your information, including how we use, disclose and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information.

As a business operating in Australia, we are required to adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), which regulate the collection, storage, use, and disclosure of personal and sensitive information. In addition, they also give individuals the right to access and correct any personal information that we have collected about them.

In this Privacy Policy:

- Credit eligibility information means credit reporting information disclosed by a credit reporting body (CRB) to us relating to your dealings with credit providers, and information we derive from the disclosed information.
- Credit information means personal information about you that relates to your credit history, including (but not limited to) information which relates to your repayment history, consumer credit liabilities, default information, court proceedings and insolvency information.
- Credit reporting information means credit information or information derived by a CRB from credit information about you held by the CRB that has a bearing on your credit worthiness and can be used to establish your eligibility for consumer credit.
- Disclosure of information means providing information to persons at Walshs, and outside of Walshs.
- Personal information means information or an opinion relating to an individual, which can be used to identify that individual.
- Privacy Officer means our contact person for your questions or complaints regarding our handling of personal information.
- Sensitive information is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and includes health information.
- Use of information means use of information within Walshs.

What information do we collect and hold?

To provide services personalised to meet your needs, Walshs will ask you a range of personal, financial and lifestyle questions. You have the right not to divulge information about your individual objectives, financial situation and needs; however, your adviser will warn you that this may mean the advice you receive is not appropriate for your needs.

The type of information we may require includes

- name
- date of birth
- residential and postal addresses
- phone numbers
- email addresses
- residency status
- dependents
- employment, occupation and/or company officeholder information
- marital status
- banking or credit card details required for processing payment
- property title, ownership and transfer details
- details about your driver's licence and other identification documents
- financial information, including details of:
 - credit information
 - credit reporting information
 - credit eligibility information
 - shareholdings
 - financial history
 - your investments
 - your other assets
 - your loans and other liabilities
 - your cashflows, income and expenses
 - insurance information
 - taxation information
 - superannuation information
- details of your financial needs and objectives
- details of your current financial circumstances
- assets, liabilities, income and expenditure
- insurance cover and superannuation
- information about your Centrelink eligibility
- details about your health or your family health which may impact upon our recommendations
- information you provide when registering for or using Walshs digital platforms or mobile applications, including your level of professional or medical training

Wealth Health Foundations app

When you register for the Wealth Health Foundations app, we collect the information you provide during registration, including your name, email address, mobile number and level of professional or medical training. The app is an informational and educational platform and does not collect your financial, taxation, credit or health information. Content made available through the Wealth Health Foundations app is general and informational in nature and is not personalised using financial, taxation, credit or health information held about you elsewhere within the Walshs group.

How do we collect your personal information?

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 information to us. Where we have not been provided with the information or do not have access to obtain this directly, we generally collect personal information directly from you. This may take place in several ways, such as when you:

- request the provision of financial services from us and we collect information in the course of providing those services to you.
- subscribe to our newsletters or other updates
- complete a contact form on our website
- comment or interact with our social media accounts
- provide us with requested documents
- provide us with payment details
- do business with us
- provide us with feedback or submit a complaint
- apply for a job with us, or

- call us or send us correspondence
- register for or use a Walshs mobile application or other digital platform

Where you use the Wealth Health Foundations app, the personal information associated with your account is provided directly by you through the app. Walshs does not populate the app with personal, financial, taxation or other client information held elsewhere within the Walshs group.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately. For example, we will be unable to arrange finance for you if you do not provide accurate and complete information to enable us to undertake our responsible lending assessment.

Third Party Suppliers

We may also collect personal information about you from a third party, including your broker, referrers, marketing agencies, electronic identity verification providers, document verification providers, sanctions and politically exposed person (PEP) screening providers, and other service providers engaged to assist us in complying with our legal and regulatory obligations. Our clients may also provide us with your personal information. For example, borrowers may provide us with contact details of their accountant or solicitor. We may also source publicly available information from third parties including real estate listing portals, government departments or agencies, local councils and authorities. All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by us must abide by this Privacy Policy and Collection Statement (Privacy Policy). We make this Privacy Policy available free of charge at <https://walshs.com.au/privacy-policy/>

We may also engage technology providers to operate and support our websites, mobile applications and other digital platforms, including providers of hosting, infrastructure, software, communications and push-notification services. These providers may process limited personal information on our behalf where reasonably necessary to provide those services.

Sensitive Information

We will not collect sensitive information about you without your explicit consent, unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

Use of Pseudonyms

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.

Unsolicited Personal Information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information, we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

Why do we collect and hold personal information?

We may use and disclose the information we collect about you for the following purposes:

- provide clients with our services
- set up and update your user profile on our website
- verify your identity and undertake customer due diligence
- obtain your credit report from a CRB
- undertake ongoing customer due diligence, including document verification, beneficial ownership verification, sanctions and PEP screening where required
- review and meet your ongoing needs
- provide you with information we believe may be relevant or of interest to you
- let you know about other products or services offered by us or our commercial partners, send you information about special offers or invite you to events. You may opt out of receiving direct

marketing communications from us at any time by contacting us or by using the unsubscribe facility provided in our electronic communications.

- enable our commercial partners to contact you about their products or services
- consider any concerns or complaints you may have
- comply with applicable laws, regulations, licence conditions and other legal obligations, including our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).
- help us improve the products and services offered to our customers and enhance our overall business.
- create and manage accounts for our mobile applications and other digital platforms
- provide informational and educational content through those platforms
- communicate with app users and respond to their enquiries
- administer, maintain and improve our mobile applications and other digital platforms, and,
- send service-related communications and, where you have consented, marketing or promotional communications

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act. Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

Walshs is required to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and associated Rules. To meet these obligations we may collect, verify and update information about you before providing certain services and throughout our relationship with you. This may include verifying your identity (including through electronic identity verification technologies where appropriate), collecting information about beneficial ownership or control, undertaking ongoing customer due diligence and requesting updated documentation from time to time. Information collected for these purposes may be disclosed where permitted or required by law.

What will you do with that information you have on file?

We will not use or disclose personal information collected for any purpose other than for which it was provided or where you have consented to disclose information on your behalf. Where we are obliged to disclose information by law, for example, under Court Orders or Statutory Notices we will do so.

In the normal course of providing you with financial services, advice, and assistance your information may be provided to:

- support staff
superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us
- to the trustees or managers of Master Trusts and Wrap Accounts who services we may recommend
- to organisations to whom we may outsource certain functions from time to time
- to another Walshs financial planner during periods when your original financial planner is unavailable so that you can be assured of receiving a continued service
- other Walshs entities or members of the Walshs corporate group where reasonably necessary to provide integrated services requested by you, administer your relationship with us, or where otherwise permitted or required by law.
- anybody who represents you, such as financial consultants, accountants, lawyers, finance brokers and advisers
- referrers who introduce you to us
- lenders, including (where necessary) related bodies corporate and service providers of lenders
- brokers, solicitors, accountants or other service providers that are (or may be) involved in arranging and securing finance for our clients
- a CRB or credit provider to obtain your credit report
- an associate, agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisers
- our customer relationship management (CRM) software provider, and add-on applications that

are used with this software

- 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, or
- other persons or bodies as 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 may also disclose personal information where you have expressly authorised the disclosure. For example, if you consent to us disclosing your personal information to our commercial partners so they can let you know about their products and services.

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 if you do not wish to receive marketing material, please notify our office. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. Your personal information is treated as confidential.

If you enable notifications, we may send you push notifications through our mobile applications. We may use third-party technology providers to deliver these notifications, which may require limited device and notification information to be processed by those providers. You can manage or disable push notifications through the app or your device settings. Where notifications contain marketing or promotional material, we will comply with applicable consent and opt-out requirements.

Will my information be disclosed overseas?

We may use service providers located outside Australia, or service providers that store, process or access personal information from locations outside Australia.

Where we disclose personal information to an overseas recipient, we will take such steps as are reasonable in the circumstances to ensure that the recipient handles the information in a manner consistent with the Australian Privacy Principles, except where an exception under the Privacy Act applies.

Some of the entities we use to provide services, technology, administration, research and other business functions may be located in, or have operations or data storage facilities in, other countries. The countries in which our service providers may store, process or access your personal information currently include:

- Administration, technology, application hosting, communications, research and other financial services and specialist advice: Canada, India, Singapore, Malaysia, the Philippines and the United States of America.
- Sending or receiving superannuation benefits overseas: United Kingdom and New Zealand.

The Wealth Health Foundations app uses third-party technology providers to support its operation and communications. Information associated with app notifications may be processed or stored in the United States of America.

Any overseas disclosure does not affect our commitment to safeguarding the personal information we collect. We will take reasonable steps to protect personal information disclosed overseas in accordance with our obligations under the Privacy Act and the Australian Privacy Principles.

Management of Personal Information

We recognise the importance of securing the personal information of our clients and other people whose personal information we hold. We maintain high data security standards to reduce the risk of unauthorised access to your information. In the event of an eligible data breach, we will comply with our obligations under the Notifiable Data Breaches scheme established under the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner where required.

Walshs retains personal information only for as long as reasonably necessary to fulfil the purposes for which it was collected, to comply with legal, regulatory and professional obligations, resolve disputes and enforce our

agreements. When personal information is no longer required, we take reasonable steps to securely destroy or permanently de-identify it, unless we are required by law to retain it.

Your personal information is stored in our computer database, including our cloud storage databases. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- strong passwords are required to access the system via a secure password portal
- data ownership is clearly defined
- employees and contractors are required to comply with our standard operating procedures and policies for securing personal information and to attend regular training on data protection
- employees and contractors have restricted access to certain sections of the system
- the system automatically logs and reviews all unauthorised access attempts
- all computers which contain personal information are secured both physically and electronically, and are subject to vigorous cyber protection protocols
- data is encrypted during transmission over the network, and
- printing of documents containing personal information is limited

Artificial Intelligence

Walshs may use artificial intelligence and other automated technologies to assist in providing services, improving operational efficiency and supporting administrative functions. Personal information will only be processed using these technologies where appropriate safeguards are in place and in accordance with applicable privacy laws, our information security requirements and our internal governance policies. Artificial intelligence is used to support our personnel and does not replace professional judgement in the provision of advice or services. Walshs does not use artificial intelligence to make automated decisions that have a legal or similarly significant effect on individuals without appropriate human oversight.

How do we keep personal information accurate and up to date?

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up to date. Please note that if we have collected your personal information as part of the loan application process (for example, in a loan application form), we rely on you to ensure that this information is accurate.

We encourage you to contact us to correct or update any personal information we hold about you, including by updating your account information on our website or contacting us directly if any information provided during the loan application process has changed. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information. If we do not agree with your corrections, we may refuse to update the personal information, in which case we will provide you with a written explanation as to why.

The Privacy Act allows you to seek access to your personal information. To request access, please contact:

Walshs Privacy Officer:

Annabelle Clare

(P) 07 3221 5677

(E) annabelle@walshs.com.au

There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

Making a complaint

We have an effective complaint handling process in place to manage privacy risks and issues. To find out more please view our complaints policy via our website by [clicking here](#). Should you be unsatisfied with the resolution provided by our office, you may contact the Office of the Australian Information Commissioner by submitting a complaint through their [online form](#).