



DBC Advisory Pty Ltd

Privacy Policy

Last Updated: January 2019

PRIVACY POLICY

DBC Advisory Pty Ltd (DBC Advisory) is an independent firm located in Sydney. In this Privacy Policy, 'we', 'us' and 'our' refers to DBC Advisory.

At DBC Advisory, we recognise the importance of protecting and maintaining your personal information. We appreciate that you may have concerns about your privacy and about the security, accuracy and confidentiality of personal information. DBC Advisory is committed to providing you with the highest quality professional service whilst also protecting your privacy. DBC Advisory abides by the Australian Privacy Principles established under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and the *Privacy Act 1988 (Cth) (Privacy Act)*.

This Privacy Policy sets out how DBC Advisory handles personal information that is covered by the Privacy Act. This Privacy Policy is not intended to cover categories of personal information that are not covered by the Privacy Act.

Management of Personal Information

DBC Advisory manages personal information in compliance with the Australian Privacy Principles. If you have any queries or complaints about DBC Advisory's compliance with the Australian Privacy Principles, please contact the Privacy Officer using the 'How to Contact Us' information shown below.

If you believe that DBC Advisory has breached the Australian Privacy Principles, please contact the Privacy Officer in writing. We will respond to you within a reasonable time and in accordance with the requirements of the Privacy Act. If you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner.

Quality of Personal Information

Our goal is to ensure that, at all times, the personal information we collect, hold, use or disclose is up to date, accurate and complete. We will take reasonable steps to correct personal information. If you become aware, or believe, that any personal information we hold is inaccurate, incomplete or out of date, please contact DBC Advisory as soon as you do become aware.

Collection of Solicited Personal Information

Our ability to provide you with a comprehensive service is dependent on us obtaining certain personal information. This may include:

- name and contact details
- date of birth and gender
- bank account details
- employment details and employment history
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, investments, insurance cover and superannuation
- documentation used for identification and verification purposes

Some personal information is considered to be 'sensitive information'. It may be necessary in some instances for DBC Advisory to collect sensitive information about you, for example, your Tax File Number.

DBC Advisory will collect information that is reasonably necessary for the primary purpose of providing a professional service to you and also for complying with our legal obligations. If this information is considered sensitive, then unless the law provides otherwise, DBC Advisory will also require your

consent to the collection of this sensitive information. We will only collect sensitive information if it is necessary to provide our services to you.

DBC Advisory will collect personal information in a fair and lawful manner. In most instances, we will collect personal information from you unless it is unreasonable and impracticable to do so. DBC Advisory will not adopt, use or disclose government agency identifiers, for example, Tax File Numbers, as our primary means of identifying you unless it is required or authorised by or under an Australian law or a court/tribunal order, or as required to identify you with the Australian Taxation Office.

Notification of the Collection of Personal Information

DBC Advisory will endeavour to collect personal information directly from you, however, at times DBC Advisory may need to collect personal information from a third party and when this occurs, we will inform you. We will also be clear about the purpose of the collection, who we might disclose this information to, whether the personal information is required under an Australian law or a court/tribunal order and the main consequences of not collecting this information.

Use or Disclosure of Personal Information

DBC Advisory will not use or disclose personal information collected by us for any purpose other than the primary purpose for which it is collected, unless you would reasonably expect us to use or disclose the information for a secondary purpose or your consent has been obtained to use the information for additional purposes. Exceptions to this include where disclosure is:

- required by superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to the provision of services and recommendations made by us
- required by law or for inspection to ensure compliance with mandatory professional standards
- reasonably necessary to assist a law enforcement agency
- external service providers for the purposes of audit, peer reviews, legal advice, consultancy, issuing statements or handling mail
- required by reporting entities for the purpose of complying with the Anti-Money Laundering and Counter-Terrorism Financing legislation
- permitted under the Australian Privacy Principles

Dealing with Unsolicited Personal Information

If DBC Advisory receives unsolicited personal information that we know could have been collected from you, we will afford it the same privacy protection as if we had solicited this personal information. If the information is not reasonably necessary for one or more of DBC Advisory's functions or activities or we know that we could not normally have collected the personal information, we will destroy or de-identify the information as soon as practicable, unless it is unlawful or unreasonable to do so.

Direct Marketing

DBC Advisory may use or disclose the personal information we hold about you for the purpose of direct marketing, such as articles that may be of interest to you, if there is a reasonable expectation that your personal information will be used for this purpose and you have not opted out of receiving direct marketing communications from us, or where you have provided your consent.

Third Party Services

In some circumstances, DBC Advisory uses third party service providers to carry out part of the services we provide to you. These services providers are typically located in Australia, and are also located in

India. DBC Advisory will be required to take reasonable steps to ensure that the Australian Privacy Principles are complied with by the overseas recipients of your personal information.

Effect of Policy

DBC Advisory operates in a dynamic business environment and we aim to review this policy annually to keep it current. We may update this privacy policy at any time by publishing an updated version on this website.

The amended policy will apply between us whether or not we have given you specific notice of any change.

How to Contact Us

All privacy complaints, requests for access to personal information, queries in relation to this Privacy Policy, or any other privacy related matter, should be directed to the Privacy Officer at DBC Advisory as follows:

Attn: The Privacy Officer
DBC Advisory Pty Ltd
Suite 1904, Level 19
Chifley Tower
2 Chifley Square
SYDNEY NSW 2000
E: admin@dbcadvisory.com.au

We will respond to your request within a reasonable time and in accordance with the requirements of the Privacy Act.