

# **Privacy Policy**

This document outlines the policy of Crystal Wealth Partners Ltd (Crystal Wealth, we, us) on handling the personal information it collects about individuals including clients and prospective clients.

We respect the confidentiality of your information and take your privacy seriously, therefore Crystal Wealth abides by the Australian Privacy Principles established under the Privacy Act 1988 as amended from time to time.

By using our website, services or products offered by Crystal Wealth, or by providing any personal information to us, you consent to the collection, storage, use and disclosure of your personal information in accordance with this Privacy Policy.

## Type of Personal Information Collected

Crystal Wealth may ask for a range of personal information to assist in providing you with relevant financial products and services. Personal information has the meaning given in the Privacy Act and the personal information we may request includes your name, address, date of birth, and contact details (including your phone number and email address). We may (depending upon the advice you seek) also collect information about your income, assets and liabilities, account balances, tax and financial statements, employment details and citizenship status.

Please note that any information collected which does not disclose your identity or enable your identity to be ascertained will not be classified as personal information and therefore will not be subject to this privacy policy.

#### **Sensitive Information**

We sometimes need to collect and use sensitive information. This includes information or an opinion relating to person's health and medical history and personal relationships for insurance and estate planning purposes

The Australian Privacy Principles set out restrictions about the way the sensitive information can be used. We will only collect your sensitive information if you give us your consent and if the information is necessary or related to the services we provide you, and we will only use or disclose sensitive information for the purposes for which it was provided.

What happens if you do not provide information that has been requested?

It is your choice whether to provide your information. However, if you don't, we may be unable to fulfil your request for a specific product or service. Where you are seeking financial planning services, it may also affect our ability to properly analyse your personal circumstances.

#### Collection, Use and Disclosure

Crystal Wealth collects personal information about you to provide you with the range of services and products that you request. In most instances, we collect your personal information when you fill out a Crystal Wealth client profile or client risk profile or an application form, but we may also collect information from you which you provide to us over the telephone, meetings or email. In some situations, we may collect your personal information from a third party such as your accountant, solicitor, adviser, agent, fund manager, insurer, administrator or another organisation (e.g. government agency) with your authorisation. We may also have an arrangement with other third parties from which we collect your information for the distribution of products and services offered or arranged by us.

The type of product or service you request from us will determine the type of personal information we collect. When we have collected your personal information, we use it to provide you with a product or service appropriate to your needs. Crystal Wealth may disclose some of your personal information to external organisations who assist us in administering, arranging or delivering the provision of the relevant products or services to you (for example, an accountant involved in the provision of relevant taxation advice to you).

Similar to other financial services organisations, there are also situations where Crystal Wealth may disclose your personal information where it is:

- required by law (such as to the Australian Tax Office or other agency); or
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests).

Who does Crystal Wealth share personal information with?

From time to time we may share your personal information with other entities or persons both within and outside of Crystal Wealth. The entities or other persons that we might share your personal information with vary according to the product or service involved, but could include:

- other financial planners, brokers and other parties authorised or accredited by us;
- service providers and specialists we engage to provide us with services such administrative financial, insurance or research services, some of whom may contact you on our behalf;
- courts, tribunals and other dispute resolution bodies in the course of dispute;
- anyone authorised by you or whom you have provided your consent either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf;
- anyone to whom you are required or authorised by law to disclose your personal information: and
- other financial services institutions in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

# Overseas disclosure of personal information

Some of the entities we share information with may be located in, or have operations in other countries. The current list of countries to which your personal information will be sent is set out below:

Execution and settlement of securities	Canada, France, Germany, Japan, Switzerland, United States, United Kingdom
Administration, research and other financial services	Canada, India, Malaysia, Hong Kong
Sending and receiving superannuation benefits	United Kingdom, New Zealand
overseas	

We require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles.

#### Will my personal information be used for direct marketing?

We may also use your personal information to keep you informed of new services or special arrangements offered or distributed by us that we believe may be appropriate or of interest to you. When conducting any of our marketing activities, we may disclose some of that information to other service providers.

You can opt out of receiving direct marketing information from us at any time by contacting our Privacy Officer.

# Can you remain anonymous or use pseudonym when dealing with Crystal Wealth?

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our services.

However, in many cases it will be impracticable for us to assist you if you wish to remain anonymous or use a pseudonym. The provision of many financial services is highly personalised, with quality and a scope of financial advice heavily dependent on the individual circumstances of each customer. Because of this, if you choose not to identify yourself or wish to use pseudonym, we may be unable to provide you with a specific product or service you want. It may also affect our ability to properly analyse your personal circumstances so our recommendations may not be completely appropriate or suitable for you.

# **Cookies**

A 'cookie' is a small text file placed on a computer by a web server. A cookie allows information to be retrieved from the computer by a web page server. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including

security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your web browser.

Our website uses 'cookies' which enable us to identify your browser while you are using our site. Cookies do not identify you. They simply allow us to track usage patterns so that we can measure the level of interest in various areas of our website. Many browsers allow you to be notified when you receive a cookie and elect to either accept it or not. If you do not wish to accept a cookie this may impact the effectiveness of our website. Your internet service provider should be able to assist you with the appropriate setup of your browsing preferences.

# **Storage and Security**

Your personal information is held in a combination of secure computer storage facilities, paper-based files and other formats. Information may also be held in one or more computer databases and regular backups of all files.

Crystal Wealth will at all times seek to ensure that the personal information collected and held by it is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information will be treated as confidential and any sensitive information is treated as highly confidential.

In the event you cease to be a client of Crystal Wealth, we may still be legally required to maintain and store your records for a significant period of time, generally 7 years. However once we believe the information is no longer needed we may remove any identifying details or destroy the records entirely.

## **Correction of Information**

Crystal Wealth relies on the accuracy of the information that you provide to us to fulfil your needs and protect your information. We will endeavour to ensure that, at all times, the personal information about you which it holds 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 out-of-date, please contact us by any of the methods detailed below.

## **Access to Information**

Under the Australian Privacy Principles, you are generally entitled to access your personal information that is held in our records. You may at any time contact us by one of the methods detailed below and request access to your personal information as outlined below. In such cases, we will (subject to the following exceptions) provide you with access to that information either by providing copies of the information requested, allowing you to inspect the information requested or by providing you with an accurate summary of the information held by us.

Crystal Wealth will, prior to providing access in accordance with this policy, require you to provide evidence of your identity. Crystal Wealth is permitted to refuse access to personal information in certain situations. Examples include where:

providing access would pose a serious threat to the life or health of a person;

- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information relates to existing or anticipated legal proceedings between Crystal Wealth and you and would not be discoverable in those proceedings;
- providing access would reveal Crystal Wealth's intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body;
- providing access would reveal evaluative information generated within Crystal Wealth in connection with a commercially sensitive decision-making process.

In the event Crystal Wealth refuses you access to your personal information, we will provide you with an explanation outlining the reasons for that refusal.

Crystal Wealth will endeavour to respond to any request for access within 7 days depending on the complexity of the information and/or the request. If the request is urgent you should indicate this clearly in any request. We reserve the right to charge for the costs associated in providing the information to you.

# **Crystal Wealth Website and Links to Other Websites**

Crystal Wealth's website may contain links to third-party websites. Crystal Wealth is not responsible for the conduct, content or privacy practices of these websites, including any third-party website which is linked on the Crystal Wealth website.

#### **Privacy Policy Contact**

# You can contact us to:

- seek more information about anything contained in this policy , or to request a copy of this policy in a different format
- update or correct your personal information
- opt out of receiving direct marketing materials
- ask about accessing or correcting the personal information we hold about you; or
- make a privacy related complaint

# in one of the following ways:

• by telephone: (02) 8599 1790

• by email : <a href="mailto:help@crystalwealth.com.au">help@crystalwealth.com.au</a>

• in writing: Crystal Wealth Partners Limited

GPO BOX 2621 Sydney NSW 2001

# **Complaints Process**

Should you wish to make a complaint which relates to your privacy in any way, we encourage you to contact our Privacy Officer directly on (02) 8599 1790. If your privacy complaint cannot be resolved over the telephone, we may ask you to lodge a written complaint. If this happens, or if you prefer to put your complaint in writing initially, please address it to:

The Privacy Officer
c/- Crystal Wealth Partners Limited
GPO BOX 2621
Sydney NSW 2001

Facsimile: (02) 8599 1799

Alternatively your concerns can be emailed to: <a href="mailto:help@crystalwealth.com.au">help@crystalwealth.com.au</a>

If you still have concerns further assistance may be available from:

**Australian Financial Complaints Authority** 

Phone: 1800 931 678
Website: www.afca.org.au
Email: info@afca.org.au

Or

The Office of the Australian Information Commissioner

Phone: 1300 363 992
Website: <a href="mailto:www.oaic.gov.au">www.oaic.gov.au</a>
Email: <a href="mailto:enquires@oaic.com.au">enquires@oaic.com.au</a>

## **Changes to this Privacy Policy**

We reserve the right to review and amend our Privacy Policy from time to time.