

Reference Documents
Privacy Act 1988 (Cth)
Privacy and Other Legislation Amendment Act 2024 (Cth)
Australian Privacy Principles
Corporations Act 2001 (Cth)
Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)

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1.0	July 2025	New policy created

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1 About this policy

At Advice Links Pty Ltd (**Licensee**), protecting your personal information is fundamental to how we operate. This Privacy Policy explains our commitment to safeguarding your privacy under Australian law, specifically the Privacy Act 1988 and the Australian Privacy Principles.

We recognise that trust is the cornerstone of our client relationships. This policy outlines our approach to collecting, managing, using and protecting your personal information throughout our professional relationship. We also detail your privacy rights and how you can exercise them.

Our business centres on helping clients navigate complex financial decisions and build wealth for their future. To deliver tailored advice that genuinely serves your interests, we need to understand your unique financial circumstances, goals and personal situation. This necessitates collecting and using various types of personal information about you.

Beyond our primary advisory services, we may also process your information for operational purposes including:

- client service delivery and support;
- business administration and record keeping;
- · regulatory compliance and reporting;
- staff training and quality assurance;
- complaint resolution and dispute management.

This policy is subject to regular review to ensure it remains current with legislative changes and evolving business practices. Updates will be made as needed to reflect new requirements or operational changes.

2 What information do we handle

We work with different types of client data to provide professional services. Under Australian legislation, personal information encompasses details and opinions relating to people who can be identified or are capable of being identified, irrespective of accuracy or documentation format.

The personal information we typically collect and manage may include:

Information Category	Date
Identity Information	Full name, date of birth, place of birth, identification documents
Contact Details	Residential and postal addresses, email addresses, telephone numbers
Government Identifiers	Tax File Number, Medicare number
Financial Information	Income, expenses, assets, liabilities, investment holdings
Employment Details	Occupation, employer information, employment history
Family Information	Marital status, dependents, beneficiaries, estate planning details

Medical details provided by you, along with health records and assessments accessed for insurance purposes.
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We may also collect sensitive information where necessary for specific services, such as health information for insurance advice or recommendations. Such collection only occurs with your explicit consent and where legally permitted.

3 Information sources and collection

3.1 Where your information comes from

Client data reaches us via several pathways as part of delivering our advisory services. Most commonly, you provide details directly during meetings, through completed forms, or via phone and email correspondence. This direct approach ensures accuracy and allows for immediate clarification of any questions.

External sources may also provide relevant details when authorised or legally required, such as:

- Financial institutions: Banks, super funds, investment platforms, insurance companies
- Professional advisers: Accountants, solicitors, other financial advisers
- Government agencies: Australian Taxation Office, Centrelink, regulatory bodies
- **Family members:** Spouse, adult children or other relatives (with appropriate authority)
- **Employers:** For employment verification and superannuation details

We maintain strict protocols around third party data collection, ensuring proper authorisation exists before accessing information from external sources. All data gathering activities align with privacy legislation and professional standards.

3.2 Unsolicited information handling

Occasionally, we may receive client details without our request or initiation. Upon receipt of such material, we conduct an immediate assessment to determine whether we possess legitimate grounds for retaining this data under privacy legislation.

Where no valid collection basis exists, we implement secure deletion or deidentification procedures promptly, subject to legal constraints and practical considerations.

3.3 Informing you about collection

Transparency is central to our privacy practices. We ensure you understand how and why we collect your information by providing clear notices that explain:

- who we are and our contact details
- what specific details we're requesting and why
- legal requirements driving our data needs
- how this information supports our service delivery

- potential impacts if certain details aren't provided
- third parties who might receive this information
- your options for accessing and updating records
- how to raise concerns about our practices
- any sharing of your information with overseas recipients.

This ensures you can make informed decisions about sharing information with us.

3.4 Anonymous Dealings

We understand some clients prefer maintaining anonymity, though this creates significant barriers to delivering our core services. Financial advice inherently requires understanding individual circumstances, goals and risk profiles.

Legal obligations also mandate client identification and verification processes under anti-money laundering legislation. These requirements make anonymous service delivery impractical for most advisory relationships.

While we can provide general information and educational materials without identification, personalised advice and implementation services require full client disclosure to ensure compliance and appropriateness.

3.5 Consequences of Limited Information

Providing complete and accurate information enables us to deliver comprehensive, tailored advice that serves your best interests. If you choose not to provide certain information, this may impact our ability to:

- assess your financial needs and circumstances accurately;
- recommend appropriate strategies and products;
- comply with legal obligations regarding client assessment;
- provide ongoing monitoring and review services;
- assist with insurance claims or benefit applications.

We will always explain the implications of not providing specific information so you can make informed decisions about your privacy preferences.

4 Information uses and disclosure

We use personal information primarily to deliver financial advisory services and support your financial objectives. Information use and disclosure is limited to purposes that are directly related to our services or required by law.

Primary uses include:

- conducting financial needs analysis and goal setting;
- developing and presenting strategic recommendations;
- implementing agreed strategies and monitoring progress;

- facilitating product applications and account establishment;
- providing ongoing advice and portfolio reviews;
- meeting regulatory reporting and compliance obligations.

4.1 Marketing and promotional activities

We may contact you about products, services, market insights and educational opportunities that align with your interests and financial objectives.

All marketing communications include clear opt-out instructions, and you can withdraw consent for marketing contact at any time by contacting us.

4.2 International sharing of information

We may share your personal information with external service providers who support our operations. These may include providers of financial products, software platforms and administrative and paraplanning services. In some cases, these service providers may be located overseas, specifically in the Philippines, where they assist with tasks such as administration and preparing advice documents. We take reasonable steps to ensure that any overseas recipients handle your personal information in accordance with Australian privacy laws, including the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

5 Your rights and responsibilities

5.1 Maintaining information quality

Accurate, current and complete information is essential for effective financial advice. We have established procedures to ensure information quality including regular data validation, client confirmation processes and systematic reviews of stored information.

You can help maintain information accuracy by promptly notifying us of any changes to your circumstances and reviewing information we provide for verification. We will correct any errors identified and can notify third parties of corrections where appropriate.

5.2 Security and protection measures

Protecting your information from unauthorised access, loss or misuse is a critical responsibility. Our security framework incorporates multiple protective measures:

Technical Safeguards:

- Encryption for data storage and transmission;
- Multi-factor authentication and access controls;
- Secure backup and disaster recovery systems;
- Network intrusion detection.

Administrative Safeguards:

- Staff privacy and security training;
- Incident response and breach management procedures.

5.3 Access and correction rights

You have the right to request access to personal information we hold about you and to seek correction of any inaccuracies. We aim to respond to access requests promptly and comprehensively.

5.4 Incident response and breach management

Despite our protective measures, security incidents can occur. A privacy incident involves unauthorised access, loss or misuse of client information. This could include stolen devices, system intrusions or accidental disclosure to wrong recipients. We assess all suspected incidents within 30 days to determine if they constitute reportable breaches under privacy legislation. Where serious harm is likely despite our remedial actions, we notify affected clients and the Office of the Australian Information Commissioner as required by law.

Our response focuses on containing the incident, preventing further harm and implementing improvements to reduce future risks.

6 Contact us

We are committed to addressing your privacy concerns promptly and effectively. You may contact us regarding:

- · questions about our privacy practices;
- requests to access or correct your information;
- · privacy complaints or concerns;
- opting out of marketing communications;
- general inquiries about this policy.

Contact Information:

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