

# Stratton Business Services' Privacy Policy

At Stratton Business Service we are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information. It also deals with how you can complain about a breach of the privacy laws and how you can access the personal information we hold and how to have that information corrected.

## What information do we collect and how do we use it?

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As a provider of financial services we collect and hold information about you that is both relevant and necessary in order for us to provide those services. The types of information we hold depends on the services provided. We may also collect personal information from our shareholders and as required by law. When we collect your personal information, we will normally tell you why the information is collected, who it will be shared with, and inform you of the consequences if all or part of the information is not provided to us.

Personal information is any information that could identify you or be used to establish your identity. Examples of personal information that may be collected by us include but are not limited to: name, address, marital status, date of birth, type of employment, medical reports including medical history, financial reports, tax returns and previous insurance history. We will only collect personal information that is necessary for the legitimate business functions of providing the services you have requested.

On occasions, we need to collect and use sensitive information, such as when we consider applications for some insurance products.

Sensitive information includes information or an opinion relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, membership of a professional or trade association or trade union, sexual orientation or practices and criminal record. It also includes information about a person's health and medical history.

The Australian Privacy Principles set out restrictions about the way sensitive information can be used.

Unless you give us your consent, or if we are required or permitted by law, we will only use or disclose sensitive information for the purposes for which it was provided.

In order to provide the service/s you have requested, there may be occasions when information about you is obtained from others – for example, in collecting information in order to make a claim under your insurance policy. Under these circumstances, the people providing this information are also regulated by the Privacy Act.

You may choose not to provide personal information about you to us, but this may limit the services we are able to provide to you.

## When do we disclose your information overseas?

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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 could be sent is set out below:

- Stratton Business Services may also use outsourced administrative/paraplanning services where some of the information (including health information) collected by us may be disclosed outside of Australia, including but not limited to the Phillipines, India, United States If America.

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

## How do we hold and protect your information?

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We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you initially in a working file, which when completed will either be archived or electronically imaged and stored. Some of our archived files are sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by protecting it from unauthorised access, modification and disclosure. We maintain physical security over our paper and electronic data and premises, by using locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to computer systems where your information is stored.

## Stratton Business Services and Authorised Representatives Website

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**Anonymous data** – We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our service.

**Cookies** – In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to

discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

**Links to third party sites** – Our website may contain links to other third-party websites. We do not endorse or otherwise accept responsibility for the content or privacy practices of those websites, or any products or services offered on them. We recommend that you check these websites' privacy policies to find out how they may collect and deal with your personal information.

We also use your information to send you requested information and promotional material and to enable us to contact you for provision of services.

We may occasionally notify you about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post. If you would rather not receive this information or do not wish to receive it electronically, email or write to us.

## Who do we share personal information with?

We do not sell, trade, or rent your personal information to others.

From time to time we may share your personal information with other entities outside of Stratton Business Services

The entities that we might share your personal information with could include:

- service providers and specialist advisers we engage to provide us with services such as administrative, financial, insurance or research services, some of whom may contact you on our behalf;
- insurers and credit providers;
- courts, tribunals and the Australian Financial Complaints Authority (AFCA) as our external dispute resolution body in the course of a dispute;
- anyone authorised by you or to 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 we are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service);
- 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.

## Opting out

If we send you any information about services or products, or you do not want us to disclose your personal information to any other organisation (including related bodies corporate) you can opt out by calling us.

## How can you check, update or change the information we are holding?

You may have access to the personal information Stratton Business Services holds on your behalf on request, except in circumstances where access may be denied under the Privacy Act. We reserve the right to determine the manner in which the information is accessed.

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information, please write to our Privacy Officer

Ben Haynes  
Stratton Business Services  
ben@strattonwealth.com.au

We do not charge for receiving a request for access to personal information or for complying with a correction request. Where the information requested is not a straightforward issue and will involve a considerable amount of time then a charge will need to be confirmed for responding to the request for the information.

In some limited cases, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

## What happens if you want to complain?

If you have concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, you may contact our Privacy Officer:

- In writing: PO Box 10, Highbury, SA, 5089
- By telephone: 0415 222 711
- By email: ben@strattonwealth.com.au

We will respond to your query or complaint as soon as possible and will try to resolve any complaint within 14 working days. If this is not possible, we will contact you within that time to let you know how long we estimate that it will take to resolve your complaint. If we cannot satisfactorily resolve your concerns you may contact the Privacy Commissioner online or in writing:

Privacy Commissioner  
Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001  
Tel: 1300 363 992  
Website: [www.oaic.gov.au](http://www.oaic.gov.au)

## Your consent

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By asking us to assist with your financial services needs, you consent to the collection and use of the information you have provided to us for the purposes described above.