



PRIVACY POLICY

TAXATION AND ADVISORY SERVICES

SUMMERHILL FINANCIAL MANAGEMENT PTY LTD
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Privacy Policy

We understand how important it is to protect the privacy of your personal information. Accordingly, this document sets out our privacy policy commitment in respect of personal information that you may provide to us.

Our privacy policy outlines how we manage your personal information, including how and what information we collect from you, how we hold your personal information, how we use and disclose personal information and how you can access and/or update your personal information.

Summerhill Financial Management abides by the National Privacy Principles established under the Privacy Amendment (Private Sector) Act, 2001.

Your personal information

Your personal information will be collected and held by Summerhill Financial Management to provide you with advisory services that you have requested and in managing our relationship with you.

To enable us to provide you with the services that you have requested we need to obtain and hold certain personal information about you. Our ability to provide you with a comprehensive advice service depends on us obtaining certain personal information about you, including:

- your name, address and date of birth;
- details of your financial needs and objectives; and
- any other information we consider necessary.

How we collect your personal information

We only collect personal information about you when you have knowingly provided that information to us, or authorised a third party to provide that information to us.

Generally, your personal information will be collected from you in meetings with your adviser, over the telephone, via facsimile or e-mail, or any other written material that you provide.

The use and disclosure of your personal information

Your personal information may be disclosed for purposes related to providing advice that you have requested. The types of service providers that may be given your personal information include:

- your advisers/service providers such as your lawyer, financial adviser, stockbroker or bank, on your written authorisation;
- organisations that assist in operating a tax accounting business such as those that provide administrative, financial, insurance, research, legal, computer or other business services;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

If we disclose your personal information to any third party service provider, we will do so on a confidential basis, including by seeking to ensure that the personal information is held, used or disclosed consistently with the National Privacy Principles.

Your personal information may be used to:

- enable Summerhill to provide advice, products or services that you have requested;
- conduct identity verification and customer due diligence;
- comply with the anti-money-laundering and terrorist financing obligations; and
- comply with the law.

Safety and security of your personal information

We will take reasonable steps to protect your personal information. All personal information collected by us will be stored in a secure environment to protect against unauthorised access, misuse, loss, modification or unauthorised disclosure.

Accessing your personal information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

We will not provide you with access to your personal information if:

- 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 us and would not be discoverable in those proceedings;
- providing access would reveal our 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 or an enforcement body requests that access not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

Update personal information

Summerhill Financial Management takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up to date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

Spam Act

Spam is a generic term used to describe electronic 'junk mail' – unwanted messages sent to a person's e-mail account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'. 'Electronic messages' covers e-mail, instant messaging, SMS and other mobile phone messaging, but does not cover normal voice-to-voice communication by telephone.

Summerhill Financial Management complies with the provision of the Spam Act when sending commercial electronic messages.

Equally importantly, we make sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients' contact details.

Internal procedure for dealing with complaints

The three steps Summerhill Financial Management follows:

- Consent: only commercial electronic messages are sent with the addressee's consent, either express or inferred consent.
- Identify: electronic messages will include clear and accurate information about the person and that Summerhill Financial Management is responsible for sending the commercial electronic message.
- Unsubscribe: we ensure that you can unsubscribe from any e-mail sent to you.

Consent to communications

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is acceptable to send the message, or messages of that nature, or inferred consent based on our business or other relationship with you and your conduct.

Contact Details

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