

## Complete Financial Balance (CFB) Privacy Policy Statement

*Version 3, effective 3 January 2017*

By using the [cfb.com.au](http://cfb.com.au) website, you agree that we can place cookies on your device as described in this CFB Policy Statement and CFB's Cookie Notice

### Your privacy and the law

CFB is committed to respecting your privacy and protecting your personal information. We are bound by the *Privacy Act 1988* (Cth) and the Australian Privacy Principles, along with any other applicable privacy laws and codes, when collecting, using, disclosing, holding, handling and transferring any personal information. Where practical and legally permissible to do so, you have the option of providing information to us and dealing with us anonymously or by using a pseudonym.

At CFB, we have ongoing practices, procedures and systems in place to ensure that we manage personal information in an open and transparent way. Further information about these practices, procedures and systems are contained in our policy set out below.

### Key Definitions

In this statement, unless otherwise specified, the following definitions will apply:

- |                                    |  |
|------------------------------------|--|
| <b>“Act”</b>                       | means <i>Privacy Act 1988</i> (Cth) or any replacement law.  |
| <b>“APP”</b>                       | means the Australian Privacy Principles contained in Schedule 1 of the Act.  |
| <b>“Authorised Representative”</b> | means a person authorised in accordance with sections 916A and 916B of the <i>Corporations Act 2001</i> (Cth) to provide financial services on behalf of an Australian Financial Services Licence holder (including financial planners). |
| <b>“CFB Website”</b>               | means a website or mobile application owned or operate by CFB (including <a href="http://www.completefinancialbalance.com.au">www.completefinancialbalance.com.au</a> ).   |
| <b>“Privacy Statement”</b>         | means this CFB Policy Statement.   |

## About this Privacy Statement

This Privacy Statement explains how CFB manages your personal information. It provides you with a general overview of:

- Collecting your personal information**
  - the type of information CFB employees may collect and how CFB collect this information from you;
- Using and Disclosing your personal information**
  - the ways and purposes CFB employees may use and disclose your information;
- Cross-Border Disclosures of your personal information**
  - CFB's approach to disclosing your information to third party and overseas recipients;
- Holding and storing your personal information**
  - the ways CFB hold, store and secure your information;
- Accessing and Correcting your personal information**
  - how you may access and change information that CFB hold about you; and
- Resolving your privacy issues**
  - how you may raise any issues with CFB's management of your information in accordance with the APPs.

This Privacy Statement will apply to any personal information CFB may collect directly from you or other sources (where relevant and legally permissible).

CFB may update this Privacy Statement from time to time. Any updates can be accessed via CFB's website or by contacting CFB's office to request a hard copy be sent to you (which will be provided at no cost). We encourage you to periodically review this Privacy Statement so that you will be aware of CFB's privacy practices. This Privacy Statement was last updated on 3 January 2016.

## Collecting your personal information

- What is personal information?**

Personal information is generally considered as information or opinion that allows others to identify you. This includes your name, gender, contact details, as well as your health and risk profile information.
- Why does CFB collect your personal information?**

CFB will generally collect personal information which is reasonably necessary to offer and administer our services and products (including insurance, superannuation, retirement planning, estate planning, salary packaging, corporate superannuation and investment advisory services).

CFB may also collect personal information to develop and identify products and services that may interest you, conduct market or customer satisfaction research or to develop, establish and administer alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services.

**What type of information can CFB collect from you?**

The type of information that CFB employees will collect will depend on the type of product or service you request. Generally, however, we may collect information such as your name, contact details, date of birth, gender, financial and employment details and benefit coverage.

For some of CFB's services, we may also need to collect sensitive information about you. This may include information about your criminal convictions or health information in relation to life, health, professional liability and workers compensation insurance, employee benefit programs, membership of professional or trade associations and sexual preferences. We will generally only collect and hold such sensitive information where reasonably necessary to perform our engagement and with your consent.

**What can happen if you don't provide CFB employees with your information, or provide CFB with incomplete or inaccurate information?**

If you do not provide the information CFB employees request CFB, or those involved with the provision of the service or product, may not be able to provide the appropriate type or level of service or product.

**How does CFB collect this information?**

Unless impracticable or unreasonable to do so, CFB will collect information directly from you. This may occur, for instance, when you make use of CFB's website, speak to a CFB Adviser or when you contact us through telephone, facsimile, email, online or hard copy communication.

Alternatively, CFB may also collect your information from third parties such as our licensee network (Aon), or Aon's Authorised Representatives (in the case of Aon Risk Services Australia Limited, Aon Master Trust, Aon Eligible Rollover Fund, Aon Superannuation Limited and Aon Hewitt Financial Advice Limited) or other third parties such as Administrators, employers, insurance companies, insurance brokers or agents, credit organisations, motor vehicle and driver licensing authorities, financial institutions, medical professionals, third parties who may be arranging insurance cover for a group that you are a part of, law enforcement, dispute resolution, statutory and regulatory bodies, marketing lists and industry databases, publicly available sources etc. Upon your request, we will take reasonable steps to let you know how we have sourced your personal information unless it is obvious from the circumstances that you would know or would reasonably expect us to have the information (such as where we are dealing with your advisors).

**Are there any other ways CFB can collect your personal information?**

CFB may also collect information by online means when you:

- **Visit the CFB Website**

CFB may collect information during your visit to our CFB Website through the use of cookie technology. By using the CFB Website, you agree to the processing of your personal information as explained in



this Privacy Statement, including placing cookies on your device as described in the CFB Cookie Notice.

CFB collects information from the CFB Website to fulfil your request for services and to improve your online experience. CFB strives to limit the amount of information collected to support the intended purpose of the collection.

CFB may ask you for some or all of the following types of information when you register for events, request services, manage accounts, access various content and features or directly visit our website:

- contact information, such as name, e-mail address, postal address, phone number and mobile number;
- user name, password, password reminder questions and password answers;
- communication preferences, such as which newsletters you would like to receive;
- search queries;
- personal preferences pertaining to the event or service;
- contact information about others when you refer a friend to a particular site or service (note: this information is used solely to facilitate requested communications); and
- information posted in community discussions and other interactive online features.

In some instances, CFB automatically collect certain types of information when you visit our website and through e-mails that we may exchange. Automated technologies may include the use of web server logs to collect IP addresses, "cookies" and web beacons. The collection of this information aims to allow us to improve the effectiveness of the CFB website and our marketing activities.

The CFB website may contain links to other sites which are outside our control and are not covered by this Privacy Statement. If you access other sites using the links provided, the operators of these sites may collect information from you which will be used by them in accordance with their privacy statement. We encourage you to read the privacy statements on other websites you visit. CFB is not responsible for the content or privacy practices of linked sites or any use of those sites.

Please be aware that the CFB website may contain links to other financial planning sites maintained by other entities that are not governed by this Statement but by other privacy statements that may differ slightly from this Statement. We encourage you to review the privacy statement of each website you visit.

You may apply for employment with CFB through our websites. Any information submitted for the purposes of applying for employment with CFB will be collected, disclosed and held in accordance with this Privacy Statement. Otherwise, our employee records are exempt from the Act and are not covered by this Privacy Statement.

- **Engagement with CFB through Social Media**

You can engage with us through social media websites or through features such as plug-ins or applications on the CFB website that integrate with social media sites. You may also choose to link your account with us to third party social media sites. When you link your account or engage with us on or through third party social media sites, plug-ins, or applications, you may allow us to have ongoing access to certain information from your social media account (e.g., name, e-mail address, photo, gender, birthday, the posts or the 'likes' you make).

If you post information when you interact with our websites through social media sites, plug-ins or other applications, depending on your privacy settings, this information may become public on the Internet. You can control what information you share through privacy settings available on some social media sites. For more information about how you can customise your privacy settings and how third party social media sites handle your personally identifiable information, please refer to their privacy help guides, privacy statements and terms of use.

- **Access our Websites through Mobile Devices**

If you access our websites on your mobile telephone or mobile device, we may also collect your unique device identifier and mobile device IP address, as well as information about your device's operating system, mobile carrier and your location information.

When you provide us your mobile device phone number as your contact phone number, you consent to the use of your mobile device phone number for the purposes identified in this Statement. If you choose to receive notifications from us on your mobile device (e.g. text notifications), you also consent to the use of your mobile phone number for that purpose.

**How do we notify you and obtain your consent?**

In most cases we will obtain your consent to the purposes for which we intend to collect, use and disclose your personal information either at the time you engage us to provide you with a product or service, or as soon as practicable.

Otherwise, unless we hear from you by one of the means set out in this Privacy Statement, by visiting the CFB Website or by providing us with your information, you agree to your information being managed in accordance with this Privacy Statement.

You may modify or withdraw your consent at any time by contacting the Privacy Policy Officer or your CFB Adviser. If you do not give us consent or subsequently modify or withdraw your consent, we may not be able to provide you with the products or services you want.

If you provide us with information about other individuals (such as employees, dependents etc.) you must obtain their consent for us to use their information in accordance with our Privacy Statement prior to your disclosure to us or otherwise let us know if this is not the case.

**How do we deal with unsolicited information?**

Where we receive information that we have not requested (“unsolicited information”), we will determine whether that information is reasonably necessary for our functions or activities. If it is, we will handle the information in the same way that we handle information we have requested. If not, we will take steps to destroy or de-identify the information.

**Using and disclosing your personal information**

**How can your personal information be used?**

We will generally only use and disclose your personal information for the purpose that it was collected, any related purpose that you would reasonably expect us to use or disclose it for, or as permitted under this Privacy Statement or under law. CFB has a duty to maintain the confidentiality of its client’s information unless disclosure is permitted with your consent or compelled under law.

Your information may be used for the following purposes:

- to provide information, products or services you requested;
- to determine your eligibility and process applications for products and services that you have requested;
- to provide information and services as requested by clients;
- to understand and assess your ongoing needs and offer products and services to meet those needs;
- to carry out client communication, service, billing and administration;
- to administer claims;
- to conduct data analysis;
- to execute monitoring and training;
- to develop new services; and
- to conduct processing necessary to fulfil other contractual obligations for the individual.

We will only use and disclose your sensitive information for the purpose it was collected or for any other directly related purpose that you would reasonably expect us to use it for. With your consent, we may use or disclose your information for additional purposes from time to time.

**Who can access your personal information?**

We may disclose your information to the following third party service providers to assist us in providing, managing and administering our services and products:

- finance products - business partners, debt collection agencies, insurers, reinsurers, and managed fund organisations for financial planning, investment products and trustee or custodial services in which you invest;
- insurance products - business partners, including insurers, reinsurers, other insurance intermediaries, insurance reference bureaus, medical service providers, fraud detection agencies, other advisers such as loss adjusters, lawyers and accountants and others involved in the claim handling process;
- authorised service providers;
- referral sources you have given us permission to contact;

- external IT service providers, infrastructure and other third parties where required by law; and
- entities related to CFB for the purpose of offering you other products and services (provided, you have not elected to opt-out of receiving such information).

**Can your information be used for direct marketing?**

As indicated above, unless you notify us otherwise, we may use your personal information to let you know about products and services from our business partners that we think may be of interest to you. You can choose not to receive this information from us (including product or service offerings from us on behalf of our business partners) or related bodies by contacting our Privacy Officer.

**Cross border disclosures of your personal information**

**What is our approach to disclosing your information to third parties and overseas recipients?**

CFB, as part of its business requirements, may disclose personal information to overseas related body corporates and third parties who we believe are necessary to assist us in providing the relevant services and products to our clients or to enable them to offer their products and services to you. We generally limit, however, the use and disclosure of any personal information provided by us to such third parties for the specific purpose for which it was supplied.

We may also disclose personal information to third parties such as service providers when we outsource certain functions such as recruitment. This may also include third party storage providers whom we may use from time to time to store information electronically. Our recruitment agencies and physical storage facilities are based in Australia.

Disclosure may also be made to government, law enforcement, dispute resolution, statutory or regulatory bodies, or as required by law (including the *Corporations Act* and the *Anti-Money Laundering & Counter-Terrorism Financing Act*)

In these circumstances, CFB will take reasonable steps to ensure we remain compliant with the Act and the Privacy Statement (to the extent applicable). We will also make every effort to ensure that we only have business dealings with third parties that value privacy and information security the same way as us. However, by providing us with your consent to collect, use, disclose and hold your information in accordance with this Privacy Statement, you acknowledge that we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the Act in relation to the handling of your information and we will not be liable to you for any breach of any Australian privacy law by these overseas recipients under the Act or otherwise, and on this basis, you consent to such disclosure.

**Holding and storing your personal information**

**How do we hold your information?**

Your information may be held in physical format, as electronic data, or in our software or systems. In particular, we may store your information in cloud or other types of networked or electronic storage.

**What is our information security policy?**

CFB will take reasonable steps to protect personal information from misuse, interference and loss and implement physical, technical and administrative security standards to secure and protect your personal information from unauthorised access, modification or disclosure.

Steps we take include implementing and imposing:

- confidentiality requirements on our employees and other representatives, as well as third parties;
- security measures for access to our systems;
- only providing access to information once proper identification has been given;
- controlling access to our premises; and
- website protection security measures.

Further information about our data security practices can be provided on request by emailing your request to [admin@cfb.net.au](mailto:admin@cfb.net.au) with the subject line *Request for Data Security Information*. Notwithstanding the above you should be aware that no data protection and security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the Internet. It may also not be practicable to know in which country your information may be held where networked or electronic storage solutions are adopted. Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords, policy details etc.) and you should notify us as soon as possible after you become aware of any security breaches.

**How long do we hold your information for?**

When all of our legal obligations to retain your information have expired or we no longer need your information for a purpose that it was collected, we will take such steps as are reasonable to destroy or de-identify it.

**Accessing and correcting your personal information****How can I access and correct my information?**

CFB takes reasonable steps to ensure your personal information that we collect, hold and disclose is accurate, up to date and complete. However, we also rely on you to let us know of any changes or corrections required to your information. You should contact us at any time to update your personal information or advise us that the information we hold is not accurate, up to date or complete.

You can access or update your personal information, including opting out of receiving any marketing from CFB, in the following ways:

- contact your CFB Advisor or our Privacy Officer (on the contact details at the bottom of this Privacy Statement);
- if you receive electronic communications, such as an e-newsletter, you may unsubscribe at any time by following the instructions included in the communication;
- if you previously chose to receive push notifications on your mobile device, you may manage your preferences either through your device or the application settings. Alternatively, you may uninstall

the application by using the uninstall process available on your mobile device; and

- as described in our Cookie Notice, you may adjust your browser settings to accept or refuse cookies.

If we do not provide you with access or refuse to update your information, we will provide you with the reason for refusal and inform you of any exceptions relied upon.

Your request to provide information will be dealt with in a reasonable time from receipt of your request and we may recover from you our reasonable cost of supplying you with this information.

### **Resolving your privacy issues**

If you have any questions or would like further information about our privacy and information handling practices, please contact us by one of the following means:

Attn: Privacy Officer  
Complete Financial Balance  
Level 3, 17 Bowen Bridge Road  
Herston, QLD 4006  
+61 732573944  
E: [abigail.wanigaratne@cfb.net.au](mailto:abigail.wanigaratne@cfb.net.au)

If you wish to make a complaint about a breach of the Act or this Privacy Statement, you may:

- complete and submit the Personal Information Request Form to your CFB advisor; or
- contact our Privacy Officer directly on the contact details below.

**Post:** Attn: Privacy Officer  
Complete Financial Balance  
Level 3, 17 Bowen Bridge Road  
Herston, QLD 4006

**Email:** [abigail.wanigaratne@cfb.net.au](mailto:abigail.wanigaratne@cfb.net.au)

**Phone:** +61 732573944

We are committed to respecting your privacy and we will respond to you as soon as reasonably possible. If, however, you feel that your complaint has not been resolved, then you may contact the Office of the Australian Information Commissioner on the details below:

**Post:** GPO Box 5218  
SYDNEY NSW 2001

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Phone:** 1300 363 992

**Online:** <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>