

EASTWOODS GROUP LIMITED PRIVACY POLICY

1. Our Commitment

The protection of our clients' privacy and maintaining confidentiality of our clients' personal information is considered to be of the utmost importance and we take very seriously the ongoing trust that clients place in us to protect their personal information.

In handling clients' personal information, we are bound by and committed to complying with the Privacy Act 1988 (Commonwealth), the National Privacy Principles set out in the Act, applicable Codes of Practice and any other laws and codes regulating the collection, use, storage or disclosure of our clients' personal information. We have a general duty to keep confidential all personal information we hold about our clients, including clients' names, addresses, age, investment details and transactions, income, expenditure, and other personal details.

Our Privacy Policy explains how we protect clients' privacy, including:

- how we collect personal information, and why we collect it;
- how we use personal information;
- the need for us to provide personal information to selected third parties to enable us to provide our clients with the products and/or services that they request;
- the steps we take to protect and keep secure the personal information we hold; and
- how our clients may access the personal information that we hold about them and the steps they may take if they believe that the personal information is not accurate.

2. Privacy Act

The national privacy scheme is a legislatively based framework of privacy laws for the Australian private sector. It is designed to give appropriate privacy protection to individuals when private sector organisations seek to collect, hold, use, disclose, correct or transfer personal information.

The legislative framework for the Scheme comprises three tiers:

- New provisions in the *Privacy Act 1988 (Commonwealth)* introduced by the *Privacy Amendment (Private Sector) Act 2000*. These **have the force of law**.
- The National Privacy Principles contained in Schedule 3 of the *Privacy Act 1988 (Commonwealth)*. These **have the force of law**, however, they are **worded in general terms**.
- The federal Privacy Commissioner has powers under section 27(1)(e) of the *Privacy Act 1988 (Commonwealth)* to make guidelines to help organisations avoid breaching the *Privacy Act 1988 (Commonwealth)*. Guidelines made under this power are **advisory and so are not directly legally binding**.

3. How we collect personal information, and why we collect it

We collect most personal information about our clients directly from the clients themselves. For example, we may collect personal information via a Client Questionnaire before a first client interview, when a client deals with us over the telephone, sends us a letter, visits our website, or has contact with us in person.

There may be occasions when we need to obtain personal information about one of our clients from a third party – an example would be collecting personal information from our related entities, a superannuation fund manager, tax agent, or Centrelink.

Initially, we collect personal information to enable us to supply, and administer, the products and services a client requires from us.

EASTWOODS GROUP LIMITED PRIVACY POLICY

We also collect it so that we can provide them with information about our products and services (marketing information), unless they tell us that they do not wish to receive it (refer section 7 below).

The personal information that we collect is only that which is necessary to enable us to provide our clients with the products or services that they have requested. The types of personal information collected may include a client's:

- name and contact details;
- current residential address;
- age;
- employment and income details;
- investment and superannuation details;
- expense and cash needs; and
- risk insurance and estate planning details.

In certain circumstances we may also need to collect sensitive information such as health details. For example, if a client's health affects their long-term investment objectives.

4. We will use clients' personal information for the primary purpose for which it was collected and for related secondary purposes

At or before the time we collect personal information we will advise our clients of the primary purpose for which we will use it.

We will also give our clients general advice as to related secondary purposes for which we may use the information, which may include:

- internal accounting and administration;
- regulatory reporting and compliance;
- servicing our relationship with each client; and
- protecting our clients and us from error and fraud.

The Eastwoods Group Ltd (Eastwoods) is a wholly owned subsidiary of Community CPS Australia Ltd. Eastwoods operates under the names Eastwoods Wealth Management Pty Ltd, Eastwoods Accounting and Taxation Pty Ltd, and Eastwoods Finance Brokers Pty Ltd. Information may be shared with Community CPS Australia Ltd and Eastwoods Group entities if they are providing a service to a client that the client has requested.

5. Providing personal information to third parties

Sometimes we may need to give some personal information about our clients to other organisations who provide services that assist us in supplying, or in administering, the products and services our clients require, or assist us in giving clients the information that they are entitled to as clients. Examples of such organisations are:

- our related entities;
- investment/superannuation providers;
- insurance providers;
- Centrelink;
- printing and mailing houses;
- legal advisors; and
- conveyancers.

These organisations may only use the information to the extent necessary to provide the services we require.

Whilst we abide by our general duty of confidentiality, we may disclose our clients' personal information if that disclosure is:

EASTWOODS GROUP LIMITED PRIVACY POLICY

Required to comply with our legal obligations

This includes disclosure to various government departments and agencies (e.g. the Australian Taxation Office, APRA, ASIC and AUSTRAC); disclosure to the Courts under subpoena; and disclosure to our auditors and legal advisors.

In the public interest

Where a crime, fraud, or misdeed is committed or is suspected, disclosure may be justified.

In Eastwoods' interest

This may include disclosure to a Court in the event of legal action to which we are a party.

We will not sell any personal information about our clients to any other organisation, and we will not disclose names and addresses to third parties for the purpose of allowing them to direct market their products and services to clients.

6. Use of identifiers

We will not use our clients' Tax File Numbers, pension numbers, Medicare numbers, Government Super scheme numbers or any other Commonwealth agency identifiers as an identification record.

We will only use and disclose these numbers for the purposes required by law, such as disclosing clients' Tax File Numbers to the Australian Taxation Office.

7. Consent for us to obtain and/or disclose personal information

We will only use a client's personal information for a purpose other than the primary purpose for which it was collected, or a related secondary purpose, with the client's consent.

In some circumstances a client's consent will be express. For example, when a client completes an investment application the client is invited to give their express consent for us to obtain financial data from the rollover fund. Express consent is often given in writing, but it may be given orally.

In some circumstances a client's consent may be implied from the client's conduct. For example, a client may be invited to contact us if the client does not wish us to use personal information for a particular purpose, and the client's consent to that use may be implied if the client does not contact us.

We are also required, pursuant to the Corporations Act, certain regulations issued by the Australian Securities and Investment Commission and the Rules of Professional Conduct of the Financial Planning Association and the Tax Practitioners Board, of which this organisation is a member, to collect information about a client for the purpose of providing the services requested.

If a client does not consent to certain uses of personal information, then unfortunately we may not be able to provide the client with some of our products and/or services.

8. Marketing Information

We may use our clients' personal information, such as their name and address, to give them with information about the other products and services that are available from us, from our related entities, and from other businesses with which we or our related entities have relationships. We may also use clients' personal information to invite them to participate in research that will assist Eastwoods in offering products and services that suit our clients' financial needs.

In any direct marketing material that we send to our clients we will advise them that they can opt out of receiving any more direct marketing material. We will not send any direct marketing material to a client who has notified us that they do not wish to receive such material.

EASTWOODS GROUP LIMITED PRIVACY POLICY

9. Keeping clients' personal information accurate, complete, and up-to-date

Our ability to provide clients with the best possible level of service is dependent on us having accurate personal information about them.

We will take all reasonable steps to ensure that our clients' personal information is accurate, complete, and up-to-date whenever we collect or use it or are required to disclose it.

If we become aware that the personal information we hold in our records is inaccurate or incomplete, either because the client has contacted us or otherwise, we will correct it as soon as practicable. If a client disagrees with us about whether the personal information is accurate, complete or up-to-date, the client has the right to request that a statement be attached to their personal information claiming that the information is inaccurate, incomplete or out-of-date.

10. Storage of clients' personal information

We will take reasonable measures to protect all personal information that we hold from misuse and loss and from unauthorised access, modifications or disclosure.

Only authorised users may access clients' personal information, and access is only for approved purposes.

Our clients' personal information may be stored in hardcopy documents or as electronic data.

We maintain physical security over our paper and electronic data stores by using locks and security systems and other measures deemed appropriate. We also maintain computer and network security, which includes such measures as firewalls (Internet security measures), and passwords to control access to computer systems.

We have a documented data risk management system to help maintain the security and integrity of both client and corporate information.

We also maintain a records retention policy which requires that information no longer required be destroyed in a confidential manner. We use a specialist third party document storage organisation to securely store certain hard copy documents until their retention date expires, after which they are confidentially destroyed.

In addition, all employees sign a confidentiality agreement as a condition of their employment.

11. Web site security and privacy

The use of the Internet allows us to provide financial services information that our clients can access whenever it is convenient to them from wherever they have internet access.

We appreciate that clients may have concerns about the confidentiality and security of the personal information that we may collect about them online. In recognition of our clients' possible concerns, we have implemented systems to ensure that our online dealings with our clients are as secure and confidential as our clients' dealings with us in person, or on the telephone.

The Community CPS Australia Ltd web site uses cookies to identify visitors to the site. If a person becomes a client of Community CPS web site by joining 'my CPS ' and customising their home page, we will also use cookies to recognise and greet them when they return to the site. We also use cookies to analyse the way they use the site. By researching how our web site clients use the site, we are able to make continual improvements to web site features.

By joining 'my CPS ' the person agrees that they are happy for us to use cookies to greet them personally at their home page and to research the web site regularly to ensure it suits the needs of our clients.

EASTWOODS GROUP LIMITED PRIVACY POLICY

12. Clients' access rights and how to contact us

We will, upon request, provide our client with access to the personal information we hold about the client, except to the extent that:

- (a) in the case of personal information other than health information—providing access would pose a serious and imminent threat to the life or health of any individual; or
- (b) in the case of health information—providing access would pose a serious threat to the life or health of any individual; or
- (c) providing access would have an unreasonable impact upon the privacy of other individuals; or
- (d) the request for access is frivolous or vexatious; or
- (e) the information relates to existing or anticipated legal proceedings between us and the client, and the information would not be accessible by the process of discovery in those proceedings; or
- (f) providing access would reveal our intentions in relation to negotiations with the client in such a way as to prejudice those negotiations; or
- (g) providing access would be unlawful; or
- (h) denying access is required or authorised by or under law; or
- (i) providing access would be likely to prejudice an investigation of possible unlawful activity; or
- (j) providing access would be likely to prejudice:
 - (i) the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law; or
 - (ii) the enforcement of laws relating to the confiscation of the proceeds of crime; or
 - (iii) the protection of the public revenue; or
 - (iv) the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
 - (v) the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders; by or on behalf of an enforcement body; or
- (k) an enforcement body performing a lawful security function asks us not to provide access to the information on the basis that providing access would be likely to cause damage to the security of Australia.

If we are not required to provide a client with access to the client's personal information, we will:

- (a) if reasonable, consider whether the use of a mutually agreed intermediary is appropriate; and
- (b) advise the client of the reasons for denial of access.

We may recover from a client its reasonable costs of supplying the client with access to the client's personal information.

To facilitate the provision of information, we will request clients to identify, as clearly as possible, the information they require.

We will respond to clients' requests as soon as is reasonably practicable, taking into account the age, nature and amount of information requested.

To contact us about privacy issues, please speak to the Privacy Officer at Eastwoods, telephone 08 8132 9288, or email wealthmanagement@eastwoods.com.au

If clients' prefer to write to us they can post a letter addressed to:

The Privacy Officer, Eastwoods Group Ltd, 62 The Parade, NORWOOD SA 5067