

6 Collection of sensitive information

Where a client applies for certain life risk products (such as life insurance, trauma insurance, total and permanent disability insurance) it will be necessary for KYCU FINANCIAL PLANNING PTY LTD and our Authorised Representatives to collect sensitive information about a client's health. This information will only be collected when the client gives their consent by completing the product's application form. The information will be sourced by the Life Insurance company from the client, their medical professional and by other medical professionals where medical tests may have been performed. Due to confidentiality, it is sometimes the case whereby KYCU FINANCIAL PLANNING PTY LTD or the Authorised Representative may not be made fully aware of the medical circumstances by the Life Insurance company.

Unless required by law, the collection of sensitive information should only occur if the client has consented to the collection of the information.

7 Where we operate

KYCU FINANCIAL PLANNING PTY LTD operates in the following countries outside Australia:

- The Philippines.

Clients' personal information may be shared with KYCU FINANCIAL PLANNING PTY LTD employees in that country.

8 Sending personal information overseas

If we send a client's personal information to overseas recipients, we ensure that appropriate data handling and security measures are in place.

Authorised Representatives of KYCU FINANCIAL PLANNING PTY LTD may enter their own outsourcing arrangements and send information to countries other than those listed above. Those arrangements must be disclosed separately by Authorised Representatives to their clients.

9 Privacy Officer

KYCU FINANCIAL PLANNING PTY LTD has nominated a Privacy Officer to handle any queries or issues related to Privacy. This person has been nominated at a senior level.

Name: Erol Adem Doganay
Phone: 1300 788 364
Email: fp.admin@rateone.com.au
+Post: Ground Floor, 700 Springvale Road,
Mulgrave VIC 3170

If a client wishes to make a complaint in relation to a potential breach of the Privacy Act or the APPs, we will address their concerns through our complaints handling process. All complaints will be given fair consideration and will aim to be resolved within 45 days. We encourage clients to submit their complaint to the nominated Privacy Officer (details above) either via email to post. Where it is found that we are unable to finalise the investigation of a client's complaint within 45 days, we will contact the client to request an extension.

If a client believes they did not receive a satisfactory resolution to their concern, they may contact the Office of the Australian Information Commissioner. They are able to do so by:

- Visiting www.oaic.gov.au and submitting an online form;
- Obtaining a hard copy form at www.oaic.gov.au/about-us/contact-us-page;
- Phone: 1300 363 992;
- Fax: 02 9284 9666;
- Email: enquiries@oaic.gov.au

The Office of the Australian Information Commissioner is also available via Social Media outlets. Please refer to the Contact Us page at www.oaic.gov.au/about-us/contact-us-page.

10 Sale of an Authorised Representative's business

In the event that either our Authorised Representative or we propose to sell our business, or if an Authorised Representative is no longer eligible to provide advice, we may disclose some of a client's personal and sensitive information to potential purchasers for the purpose of conducting due diligence investigations. Any such disclosures will be made in the strictest confidence and conditional that no personal information will be used or disclosed by them. In the event of a sale being effected, we or our Authorised Representatives may transfer a client's personal information to the purchaser of the business. In this instance, the client will be provided a notice by mail to their last known mailing address that such a transfer will be taking place. They will then have the opportunity to object to the transfer within 14 days of the date of the notice.

11 Access to personal information

Clients are able to access any personal information that is held by KYCU FINANCIAL PLANNING PTY LTD or our Authorised Representatives subject to limited exceptions or required by law. The following factors will be considered:

- The information is related to a commercially sensitive decision making process;
- Access would be unlawful;
- Denying access is required or authorised by or under law;
- Providing access would be likely to prejudice an investigation of possible unlawful activity.

To access the information, a client will need to contact the Privacy Officer as detailed in this policy.

Clients may be charged a small fee applicable to the collection and provision of their personal information but will be notified of this fee prior to processing their request. The KYCU FINANCIAL PLANNING PTY LTD Privacy Officer will be able to advise the client how long it will take to provide the information. Generally however, clients will receive the requested information within 14 days of the request.

If a client believes that the personal information that KYCU FINANCIAL PLANNING PTY LTD or our Authorised Representatives hold about them is incorrect, they have a right to request their personal information be corrected.

Where KYCU FINANCIAL PLANNING PTY LTD or our Authorised Representatives are unable to provide a client with the information they have requested, the reasons that the information could not be provided should be explained to the client.

9.1 Anonymity and pseudonymity

Clients are entitled to remain anonymous or use a pseudonym when dealing with KYCU FINANCIAL PLANNING PTY LTD or our Authorised Representatives. However, it may not be possible to assist client with requests if they wish to remain anonymous or use a pseudonym.

12 Security

KYCU FINANCIAL PLANNING PTY LTD and our Authorised Representatives strive to ensure the security, integrity and privacy of personally identifiable information. Only those authorised to do so are able to access such information. All client information is kept in a secure location and can only be accessed by authorised personnel.

However, although KYCU FINANCIAL PLANNING PTY LTD and our Authorised Representatives strive to ensure a client's security, no data transmission over the internet can be guaranteed to be completely secure.

A client's personal information is kept for as long as it is required to meet the client's financial product or service needs. For record keeping, it is generally kept for a further period of at least seven years.

KYCU FINANCIAL PLANNING PTY LTD and Authorised Representatives are required to hold personal and sensitive information in as secure a position as possible. This will include but is not limited to:

- Locked offices;
- Locked filing cabinets;
- Limited access by staff;
- Storage via a third party online provider;
- Storage via a third party online platform.

Where the data is held by an online provider, KYCU FINANCIAL PLANNING PTY LTD or the Authorised Representative should ensure that access is limited and the data is held by a provider whose only aim is storage. Those who have access to personal information should have the appropriate training, knowledge, skills and commitment to protect personal information from unauthorised access or misuse.

KYCU FINANCIAL PLANNING PTY LTD and our Authorised Representatives are required to take reasonable steps to destroy or de-identify personal information held once it is no longer needed for any purpose for which it may be used or disclosed.

13 Review

11.1 Review Frequency

This policy will be reviewed every two years by the Compliance Manager or other nominated person to ensure it remains relevant to our business. Should amendments be required either at that time, or in any intervening period, those amendments will be made immediately and staff notified.

11.2 Revision History

Author	Version	Date	Revision Details
Erol Adem Doganay	1.0	3rd March 2021	<ul style="list-style-type: none">Creation of Policy.