

## PRIVACY POLICY

**Dated 2 December 2023**

Steps Financial, together with Tanya Oddo and Antoinette Mullins (referred to as *Steps, we, our, us*) is bound by the *Privacy Act 1988 (Privacy Act)*, including the Australian Privacy Principles (*APPs*) and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by Steps must abide by this Privacy Policy and Collection Statement (**Privacy Policy**). Steps makes this Privacy Policy available free of charge and can be downloaded from its website [www.stepsfinancial.com.au](http://www.stepsfinancial.com.au).

### WHAT TYPES OF PERSONAL INFORMATION ABOUT ME DOES STEPS FINANCIAL COLLECT AND HOLD?

We collect and hold personal information about you that is both relevant and necessary in order for us to provide you with financial advice and services.

We may collect and hold a range of personal information about you, to enable us to provide you with our services and may include the following information:

- name; address; phone numbers; email addresses;
- occupation; bank account details;
- driver's license details;
- financial information, including details of:
  - your investments;
  - your insurance policies;
  - estate planning strategies;
  - taxation information;
- health information; and
- lifestyle information

### HOW DOES STEPS FINANCIAL COLLECT PERSONAL INFORMATION?

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms, and other interactions with you in the course of providing you with our products and services, including when you visit our website, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, marketing agencies, or credit providers. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

We do not give you the option of dealing with us anonymously, or under a pseudonym. This is because it is impractical, and, in some circumstances, illegal for Steps to deal with individuals who are not identified.

### UNSOLICITED PERSONAL INFORMATION

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

### WHO DO WE COLLECT PERSONAL INFORMATION ABOUT?

The personal information we may collect, and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

### WEBSITE COLLECTION

We collect personal information from our website [www.stepsfinancial.com.au](http://www.stepsfinancial.com.au) when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. You can view and access our Privacy Policy by clicking on the privacy button on our website.

### WHY DO WE COLLECT AND HOLD PERSONAL INFORMATION?

We may use and disclose the information we collect about you for the following purposes:

- provide you with our products and services, (including financial planning, wealth management, and insurance services);

- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business;
- to assist in providing wealth management, financial planning, personal risk and stockbroking services.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

## WHO MIGHT STEPS FINANCIAL DISCLOSE MY PERSONAL INFORMATION TO?

We may disclose personal information to:

- a related entity of Steps Financial or Spark Advisors;
- to another financial adviser within Spark Advisors;
- to another Australian Financial Services Licensee;
- an agent, contractor, or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, platform providers, storage and emailing services debt collectors or other advisers;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers and credit providers; and
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

If we need to appoint another financial adviser to manage your financial needs and services, you will be advised of any change to your financial adviser in writing.

## HOW DOES STEPS FINANCIAL MANAGE MY PERSONAL INFORMATION?

We recognise the importance of securing the personal information of our customers.

We take reasonable steps to protect your information from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. We will hold your personal information for 7 years after you stop using our services and will then take reasonable steps to securely destroy the information, or to ensure the information is de-identified.

## SENDING INFORMATION OVERSEAS

We may engage service providers located in countries outside Australia including but not limited to the Philippines, to assist in providing products or services. Disclosure of personal information to overseas providers may be required and will not be used for marketing purposes. We do not sell client details and we will not disclose your details to an external third party without your consent.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

## MANAGEMENT OF PERSONAL INFORMATION

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification, or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked;
- data ownership is clearly defined;
- the system automatically logs and reviews all unauthorised access attempts;
- all computers which contain personal information are secured both physically and electronically; and
- print reporting of data containing personal information is limited.

Where we work remotely or from home, we implement the following additional security measures:

- password complexity is enforced, and employees are required to change their password at regular intervals;
- we ensure that employees only have access to personal information which is directly relevant to their duties; and
- employees may not disclose an individual's personal information to colleagues or third parties, via personal chat groups.

## DIRECT MARKETING

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

If you would like to "opt out" of having your information used for direct marketing purposes, please email us with the subject "Unsubscribe" and include the following information: name of company you received the communication from, full name and email address.

## IDENTIFIERS

We do not adopt identifiers assigned by the Government (such as drivers' license numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

## HOW DO WE KEEP YOUR PERSONAL INFORMATION ACCURATE AND UP TO DATE?

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction.

Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

## HOW DO I GET ACCESS TO THE PERSONAL INFORMATION STEPS FINANCIAL HOLDS ABOUT ME?

You may request access to the information we hold about you by contacting your authorised representative or Spark Advisors directly. Upon receipt of your request we will endeavour to service your request as quickly as possible within 30 days.

We will require identity verification and specification of what information is required. In some circumstances access to your information or parts thereof may not be possible. If this is the case we will inform you as to why and, where practicable, make alternative arrangements. Depending on the requirements an administrative fee for search and photocopying costs may be charged to service requests.

## UPDATES TO THE PRIVACY POLICY

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

Please also read the Privacy Policy of our Licensee, Spark Advisors Pty Ltd which is located on their website: <https://www.sparkfg.com.au/privacy-policy/>

## REPORTING YOUR CONCERNS

We have an effective complaint handling process in place to manage privacy risks and issues.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business.

### Step 1 – Contact your Adviser

Please discuss the issue with your adviser and make them aware of your complaint.

They should address the issue at hand within 5 business days.

### Step 2 – Escalate complaint to Licensee

If your adviser has not handled the complaint to your satisfaction within 5 business days, please contact our Licensee, using the following details:

Level 2, 181 Bay Street, Brighton VIC 3186

Ph: 1300 974 947

Email: [compliance@sparkfg.com.au](mailto:compliance@sparkfg.com.au)

Website: [www.sparkfg.com.au](http://www.sparkfg.com.au)

### Step 3 – External dispute resolution

If the complaint cannot be resolved to your satisfaction within 30 days, you have the right to refer the matter to the Australian Financial Complaints Authority (AFCA). AFCA provides a fair and independent financial services complaint resolution that is free to consumers.

Australian Financial Complaints Authority

GPO Box 3

Melbourne VIC 3001

P: 1800 931 678

E: [info@afca.org.au](mailto:info@afca.org.au)

W: [www.afca.org.au](http://www.afca.org.au)

## CONTRACTUAL ARRANGEMENTS WITH THIRD PARTIES

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act.

These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

## YOUR RIGHTS

This Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information;
- you may ask us to provide an alternative means of identity verification for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);
- you may complain about a breach of the Privacy Act, including the APPs; and
- we will deal with a privacy complaint.