

Privacy Policy

The i2 Advisory Group privacy policy is based on an openness and transparency about how we use and protect your information. The i2 Advisory Group is committed to treating the personal information we collect in accordance with the Australian Privacy Principles (APP) in the Privacy Act 1988 (Cth) (Privacy Act). This policy sets out how the i2 Advisory Group handles personal information.

The i2 Advisory Group consists of the entities as detailed in Appendix A.

The i2 Advisory Group privacy policy is available by the link on the website. The privacy policy will be reviewed regularly to take account of changes in legislation, technology, and our operations and practices. We aim to ensure the policy is appropriate to your and our changing environment. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.

On request we are able to provide you with a copy of the policy in an alternate format. If you have any enquiries or would like to make a request for a copy of the policy, please contact our Privacy Officer (refer to contact details below).

Purposes for which the i2 Advisory Group collects, holds, uses and discloses personal information:

We only collect, hold, use and disclose personal information which is reasonably necessary to ensure that we are able to provide you with the products and services that are appropriate to your needs. We will outline to you when you engage our services the purposes for which we will collect, hold, use and disclose your personal information.

Kinds of personal information the i2 Advisory Group collects:

Due to the nature of the products and services we provide, and the requirements of legislation and regulations, we ask for a range of personal information from our customers.

The types of personal information we may collect can include details such as:

- Names, employment titles, contact details;
- Date of birth and gender;
- Information in identification documents (e.g. passport, driver's licence);
- Tax file numbers and other government related identifiers;
- Assets and liabilities;
- Educational qualifications and employment history ;

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- Personal income;
 - Visa and work permit status;
 - Bank account details;
 - Shareholdings and details of investments;
 - Superannuation details;
 - Tax and financial statements;
 - Information regarding insurance;
 - Personal information about your spouse and dependants.

It may be necessary in some circumstances for the i2 Advisory Group to collect sensitive information about you in order to provide specific services. The types of sensitive information we may collect include:

- Health status;
- Ethnic origin;
- Details of any membership/s to professional associations;
- Criminal record.

You have a right to refuse to provide us with your personal information or to anonymity or the use of a pseudonym. However, if you do refuse to provide such information, or request the use of anonymity or a pseudonym we may be unable to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

Collection, holding, using and disclosing of personal information:

(a) Collection – General:

When we collect, hold, use and disclose personal or sensitive information it must be done through lawful and fair means. Consent must be obtained to collect, hold, use and disclose personal information. We are not required to obtain your consent to collect, hold, use or disclose your personal or sensitive information if the collection is required or authorised by or under an Australian law or a court/tribunal order. There are other exceptions to the requirement of obtaining your consent in accordance with the Australian Privacy Principles. If you would like more information on these requirements, please contact our Privacy Officer.

(b) Methods of collection:

The i2 Advisory Group uses a variety of formats for the collection of personal and sensitive information. These include:

- Requiring clients to complete a Client Profile or other forms;
- Receipt of emails, letters and other correspondence;
- Telephone calls;
- Appointments in person;
- Publicly available records;
- Through a customer's personal representative;

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- Through use of our website, such as via contact mailboxes or online enquiry forms, or through the registration process (see more information about 'web analytics' in Clause 2).

In every circumstance we will attempt to obtain such personal and sensitive information directly from you. If that is unreasonable or impracticable, we will attempt to obtain such information from other sources in accordance with Clause (a) above.

(c) Collection of someone else's personal information:

You should only provide us with someone else's personal information where you have their express consent to do so and it is for the purpose of us providing services to you. Matters in this policy should be communicated to any person whose information you collect and provide to us. In providing such information you agree that you have obtained the relevant consent and this is authorised to do so.

(d) Generally, we use your Personal Information for the following:

- To provide services to you during the course of our business activities;
- To perform due diligence and conflict checks before providing services to you;
- Analyse, review and improve the services we provide;
- For compliance and regulatory purposes;
- Other purposes related to the provision of services as provided by the i2 Advisory Group e.g. invitation to client events, distribute articles/publications

You have a right not to provide information that can identify you. If, however, you withhold your personal information, it may not be possible for us to provide you with our products and services, or alternatively, may affect the adequacy or appropriateness of advice or services provided.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases.

(e) Disclosure of your Personal Information:

In providing our services we may need to disclose personal information to a third party. This will be done to the extent that it is permitted by law and set out in this Policy.

- Any member within the i2 Advisory Group to assist in providing services to you;
- To our service providers, e.g. IT consultants, recruitment and human resource consultants for the purpose of providing services to you,
- To government agencies as required by law, e.g. Australian Taxation Office (ATO), Australian Securities and Investments Commission (ASIC)
- To any person you consent

In addition, where you have requested the services of another member of the i2 Advisory Group, your personal information will be passed to another member in the i2 Advisory Group to provide the services requested by you.

(f) Unsolicited personal information:

There may be circumstances where we are provided with personal information which we did not actively seek. An example may be misdirected mail, or an excess of documents provided to us by clients.

In such situations, our Privacy Officer will make a determination on whether we could have obtained the information lawfully in accordance with the APPs. If the information was not lawfully obtained it will be destroyed or de-identified. We will try to notify the relevant person, whose information has been mistakenly received, if this situation arises.

Security of personal information

Safeguarding the privacy of your information is important to us. We hold personal information in a combination of secure computer storage facilities and paper-based files and take steps to protect the personal information we hold from misuse, loss, interference, unauthorised access, modification or disclosure both physically and digitally.

The i2 Advisory Group trains its employees carefully on handling personal information and confidentiality of such information.

Once we have no purpose for holding your personal information, we will take all reasonable steps to destroy or de-identify the information.

Disclosure of personal information overseas and sharing personal information amongst and within the i2 Advisory Group

(a) Disclosure amongst and within the i2 Advisory Group:

The i2 Advisory Group is based in South Australia. To meet the purposes for which your personal information has been collected we may disclose your information to other members in the i2 Advisory Group.

Where Wealth Advisory services are provided to you, we are required under the Code of Professional Practice of the Financial Planning Association of Australia, to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. The Corporations Act has also provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you. This may involve the disclosure of your personal information.

Where you engage us to attend to your tax affairs we will assume (unless you advise otherwise) that you have specifically authorised us to deal directly with the Australian Tax

Office (the “ATO”) and the New Zealand Inland Revenue regarding day to day type matters. If, in the course of our dealings with these bodies, they request information regarding you that we believe is outside of such matters, e.g. Tax Office audit, we will request your specific authority before complying with their request.

If we are required by law to disclose information about you or your organisation, we must cooperate fully. However, where possible we will advise you of this fact.

(b) Disclosure overseas:

The i2 Advisory Group does not utilise service providers overseas to process data and help deliver services to you. When required, your personal information will only be disclosed to an overseas person or business in the following circumstances:

- Where the overseas recipient has signed a contract with us which creates legal obligations to comply with Australian Privacy Law (i.e. the APPs);
- If the recipient is subject to similar privacy law as Australian privacy law, and you are able to personally access avenues to enforce the protection of those laws;
- If you provide written consent for i2 Advisory Group to disclose the information after we provide you with full information; or
- If the disclosure is required or authorised by or under an Australian law or a court/tribunal order.

On collection of your personal information, we will inform you whether it is likely we will disclose the information to an overseas recipient and, if so, where those recipients are likely to be located.

(c) Disclosure to third party service providers.

The i2 Advisory Group utilises third party providers (such as IT providers and market researchers) for its business and to deliver services to you. It may be necessary for us to disclose non-sensitive personal information to these providers from time to time. Such disclosure will be in accordance with this Privacy Policy and the APPs.

Privacy on our websites

The i2 Advisory Group website uses Google Analytics or other third party software to analyse aggregate user behaviour. Google Analytics and such other software uses first party cookies, which are text files placed on your computer for the purpose of anonymously identifying your session.

These cookies are not used to grant the i2 Advisory Group access to your personally identifiable information. Non-identifiable information (such as the pages you visit) may be tracked. By directing your browser to delete your cookies, this data will be erased. For more information about Google Analytics, please follow the links provided on our website.

The information is collected using first party cookies, meaning that only the i2 Advisory Group is able to access your information. Your information may be aggregated with information from other users for the purpose of improving our website and offerings. We will not associate any data gathered from our website with any personally identifiable information, unless you explicitly submit that information (e.g. your email address) via our online information form.

Any links to third party websites on the i2 Advisory Group website are not covered by our privacy policy.

Direct marketing

The i2 Advisory Group may engage in direct marketing to you from time to time.

When required, your personal information will only be used or disclosed for direct marketing where the information is not sensitive information, is collected directly from you and there is an easy means to opt out of such marketing (and such an opt out request has not been made) in the following circumstances:

- Where you would expect i2 Advisory Group to use or disclose the information for direct marketing purposes; or
- You have consented to the use or disclosure of the information for direct marketing purposes.

If you do not wish to receive these materials, please contact our privacy officer.

Access to personal information

You have the right to access any personal information regarding you that the i2 Advisory Group holds. This is subject to some limited exceptions, which the Privacy Officer can provide further information on.

Such requests should be made in writing to the Privacy Officer. We will acknowledge your request within 14 days and respond to it within a reasonable time.

The i2 Advisory Group may charge a fee only to cover the cost of locating, retrieving, reviewing and copying any material requested. We will not charge any fee to make the request or to for us to give effect to the request.

Responding to your request:

If your request is approved, we will provide you with access to the information in the manner requested if it is reasonable and practicable to do so.

Correction of personal information

The i2 Advisory Group endeavours to ensure that the personal information it holds is accurate and up-to-date.

You are able to make a request to correct the information by contacting our Privacy Officer, or by telephoning or emailing us with your corrected information. In some limited circumstances your request may be refused or partially refused.

Procedure if your request to access or correct is refused

There may be limited circumstances where your request is refused or partially refused. If this occurs we will give you a written notice that sets out:

- The reasons for the refusal, including the reasons why access cannot be granted in an alternative way (except where it would be unreasonable to provide those reasons);
- How to make a complaint about the refusal;
- Any other matter as prescribed by the regulations.

If your request to correct is refused you have the option of submitting a statement associated with your personal information. For more information contact the Privacy Officer.

How to make a complaint

If you consider that any action of the i2 Advisory Group breaches this policy or the Australian Privacy Principles, you are able to make a complaint. Once we have received your complaint, it will be assessed and acted upon within a reasonable time.

To make a complaint please contact our Privacy Officer:

- Craig Madden
- 38 Sydenham Road Norwood, SA, 5067
- (08) 8132 6400
- admin@i2advisory.com.au

If you are not satisfied with our response to your complaint, you may contact the Office of the Australian Information Commissioner (OAIC) on 1300 363 992 or visit www.oaic.gov.au.

Appendix A – Service providers in the i2 Advisory Group

i2 Advisory - (ABN: 79 150 085 349)

- Craig Madden
- 38 Sydenham Road Norwood, SA, 5067
- (08) 8132 6400
- admin@i2advisory.com.au

i2 Advisory Financial Services Pty Ltd – (ABN: 46 607 999 477)

- Craig Madden
- 38 Sydenham Road Norwood, SA, 5067
- (08) 8132 6400
- admin@i2advisory.com.au

i2 Wealth Financial Planning – (ABN: 31 781 128 373)

- Don Sampson
- 38 Sydenham Road Norwood, SA, 5067
- (08) 8132 6400
- admin@i2advisory.com.au

i2 Advisory Wealth Pty Ltd – (ABN: 24 638 493 384)

- Craig Madden
- 38 Sydenham Road Norwood, SA, 5067
- (08) 8132 6400
- admin@i2advisory.com.au