

Financial Services & Credit Guide and Privacy Policy



A guide to our relationship with you

Grove Securities Pty Ltd

ABN 82 086 637 372

AFSL 233713

Australian Credit Licence 233713

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Purpose of this guide

This Financial Services Guide (**FSG**) and Credit Guide is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service. It is also intended that the information will assist you in determining whether or not to use any of the services that we offer.

This FSG contains important information about the financial services that we offer, our fees and remuneration, advisers who may be appointed to assist you, our privacy policy, who we act for when providing services, associations or relationships that we hold with other service providers, and what you can do if you have a complaint about our services.

If you choose to obtain personal advice from us we will provide our initial advice and any significant subsequent advice to you in writing. The initial advice will be contained in a written report called a Statement of Advice (**SoA**) which will set out the initial personal advice, and will include the basis of our advice, our fees and/or commissions, and information about any associations or relationships that could affect it.

It is important to note that we can only provide personal financial advice after making enquiries, and after giving consideration to your current circumstances and future needs.

You may also receive from us a Product Disclosure Statement (**PDS**), or a Record of Advice (**RoA**) if further advice is provided or if no financial product has been recommended. A PDS contains information about the particular product we have recommended and will assist you in making an informed decision about whether or not to acquire that product.

A RoA will contain a record of the further advice (if any) and you can request a copy of this for up to seven years from the date the further advice was provided. You may make this request in writing, by email, in person, or by telephone.

Grove Securities Pty Ltd ABN 82 086 637 372 (**Grove**) holds an Australian Financial Services Licence as well as an Australian Credit Licence so that we can assist you with credit or debt related advice when providing more holistic personal advice.

Before you get our advice

Who is my adviser?

As an employee of Grove, your adviser is a part of a highly competent team dedicated to providing the very best personal service. All of our advisers have met stringent educational standards and continue to meet strict ongoing training requirements. Upon request, we would be delighted to provide further detail about your adviser's qualifications and experience.

Although your adviser will be your primary contact, various members of our professional team may attend to your needs in various capacities in order to ensure that an effective and efficient level of service is delivered. Again, we would be delighted to introduce you to other members of our team.

If you do not wish to obtain advice from us you may still have us deal on your behalf by carrying out your instructions. If you do not obtain advice, you face the risk that the financial products you select will not fully take into account your objectives, financial situation or needs.

Who will be responsible for the financial services provided?

Your adviser will be acting on behalf of Grove. Grove is therefore legally responsible for any financial services provided by your adviser, including the distribution of this FSG. Grove can be contacted at the following addresses.

Albany

49 Serpentine Rd
Albany WA 6330
Ph: (08) 6819 7500

Claremont

1A Freshwater Parade
Claremont WA 6010
Ph: (08) 6819 7555

Who is Grove Securities?

Grove holds an Australian Financial Services Licence and is a privately owned business free of any pecuniary interests of larger financial service institutions. Grove is also a registered Tax Agent (Agent Number 26671004 with AFSL Condition).

We are committed to providing you with personal service and a professional relationship. We strive to be your adviser of choice by continually delivering on our service commitments and by helping you to achieve your financial goals in a transparent and well thought out manner. You can rely on us for appropriate advice and for the long-term management of your individual financial assets and objectives.

Choosing an appropriate financial adviser is an important decision. It is our aim to ensure that you feel completely confident in your choice of financial adviser and we welcome any requests for further information about our firm or our advisers.

What advisory services are available to me?

Our financial services licence and credit licence authorise us to deal and advise in deposit and payment products, derivatives, government debentures, stocks and bonds, life products, managed investment products, retirement savings account products, annuities, margin lending, securities (including shares), superannuation and credit activities (other than as a credit provider).

Your adviser may therefore offer a variety of integrated financial planning services including one or more of the following:

- Wealth creation
- High net worth strategies
- Centrelink assessments
- Cash & fixed interest investments
- Salary packaging
- Debentures, stocks, bonds
- Retirement planning
- Superannuation
- Derivatives
- Credit assistance
- Comprehensive financial planning
- Self managed superannuation fund (SMSF) advice
- SMSF administration (including IAS and BAS)
- Investment reviews
- Redundancy advice
- Life, income and personal risk insurances
- Investment portfolio management
- Estate planning (but not legal advice)
- Margin lending and gearing
- Aged care advice
- Budgeting and cashflow management

Grove has access to an extensive range of financial products available in the industry, and has established relationships with a wide range of institutions to enable implementation of a full spectrum of advice needs where relevant.

We do not provide financial services in relation to foreign exchange or general insurance products, except to the extent that we may recommend and assist with the implementation of foreign investments such as shares or foreign currency cash.

Our advisers are also limited to recommending products that are listed on our Approved Products List, which is continually reviewed, researched and updated so that our advisers are able to select the best and most appropriate products for a range of client needs. If you do not enter into an ongoing service agreement with us after receiving our initial advice then we will not update you on changes to our Approved Products List, even if one of your investments is removed on the basis of concerns such as elevated risk of complete loss of capital (unless we have agreed in writing with you to the contrary).

Grove has also engaged market participants to provide share trading execution and settlement facilities in support of the services Grove may provide to you. We will provide you with a separate FSG and Privacy Policy from each such market participant where the use of their services is being contemplated.

Who do you act for when you provide a financial service to me?

We act for you and in your best interests in all of our dealings. We are not owned by and do not represent, any product issuer. For life and income insurances we act as a broker, again representing you and putting your interest first.

We are under an obligation to act in your best interests in relation to the personal financial product provided to you (if any), and generally we must ensure within the subject matter of the advice provided to you:

- the scope of the advice includes all the issues for the advice to meet your objectives, financial situation and needs (including your tolerance for financial risk);
- that if the scope of the advice changes, the change is consistent with your objectives, financial situation and needs;
- that we consider whether or not to provide advice that recommends a specific product or whether you should dispose of a product or do nothing.

How will I pay for the service?

We offer a range of payment options, which will be agreed between you and your adviser prior to the commencement of any work. In all circumstances fees and other benefits, if any, will be disclosed in written format. Payment options can be dependent on the type of service that is provided but will include one or more of the following.

All of our fees quoted are inclusive of GST.

Professional fee for service - You can pay us a fee, based on the complexity of the advice, the anticipated experience and expertise required when formulating and documenting the strategies, and the anticipated time involved. We can provide you with a fixed cost quote, or simply invoice you for the actual hours worked at the relevant hourly rate.

This type of fee is generally most suitable for clients that are dealing with us for the first time, or where they have not retained us pursuant to a management or ongoing service agreement. Where a SoA has been prepared for a fixed fee, implementation of the recommendations is likely to give rise to further fees which would be dependent on the product, scope and complexity of any ongoing service agreed.

Whilst any ongoing service provided under a management or ongoing service agreement will generally include all relevant advice and administration needs, there may be occasions where the complexity and scope of advice gives rise to a need for additional project based fees. Project fees will be quoted and agreed prior to the commencement of work.

Asset based fee - You can also choose to pay us a fee which may include a percentage of the funds under management. Our standard annual fee of up to 1.10% may vary depending on the value of the portfolio, the type of service and the complexity. This fee may also be subject to a minimum fixed annual amount. These fees are generally all encompassing of advice and administration and charged on a quarterly basis. Any ongoing service fee will be agreed upon and outlined to you in detail in a SoA, RoA or ongoing service agreement.

Share Brokerage - For clients with whom we have a management agreement, share brokerage is charged at 0.55%, with a minimum of \$55. In all other cases, share brokerage is charged at 0.55% for no advice trades or 1.10% for trades with advice, both with a minimum of \$55. An account opening fee of \$55 per account will also be charged.

Online brokerage, where you execute the trade without our advice, is charged at the greater of \$29.95 or 0.33% or as otherwise advertised on our web-site.

Whilst Grove has set these brokerage rates, these are charged by the relevant market participant in accordance with a commercial contract. Grove will receive a portion of the total brokerage, which will be disclosed to you at the time and this will be dependent on the market participant, the value of the trade, and the type of service we have agreed.

Commission - In some instances we may receive commissions from life companies and other financial institutions that you invest in, or contract with. This may be in the form of an initial commission and/or an ongoing service fee. Generally any commission will be based on the value of funds involved or value of premium written and will vary from product to product.

Where an alternative method of payment has been agreed, we would generally rebate all or some of our commission back to you, usually in the form of a reduced insurance premium.

Where a life insurance company risk product has been recommended, any commission paid by the issuer of the product to us will vary depending on the issuer, product, and what we have agreed with you. The range is normally 0% to 80% of the premium in the first year, and/or between 0% and 33% per annum of the premium for subsequent years so long as you continue to hold that product (less stamp duty, policy fees and GST).

What remuneration or other benefits do you receive?

Grove's total benefits may include fees that we charge you or commissions or brokerages paid by product providers or a combination of these as outlined above. We do not receive any volume rebates, other financial incentives, or material soft dollar benefits from platform providers or third party institutions.

The advisory and non-advisory staff are salaried and may, in addition to their salaries, receive bonuses paid partly on the basis of company revenue and profitability. Your adviser may also be a shareholder, entitling him/her to associated benefits such as dividends; or be entitled to a proportion of the earnings they generate for Grove. As this will vary from adviser to adviser you may wish to ask your adviser for the exact details and they will happily provide them.

All benefits will be disclosed to you with the exact amount and/or method of calculation contained in your SOA, ROA or other document where possible.

If you were referred to us by another party, we may pay that party a referral fee. The amount of that fee, if any, will be disclosed in the SoA.

From time to time, we and your adviser may also receive other benefits from product issuers, such as technical advice, training, movie tickets or a bottle of wine. We maintain an Alternative Remuneration Register which outlines alternative forms of remuneration that we and your adviser receive and you can review this if you wish.

Do any relationships or associations exist which might influence you in providing me with the financial services?

No. We are a privately-owned company and do not have any relationships or associates that could in any way compromise our ability to deliver appropriate advice and product recommendations to you.

When you get our advice

Do I get detailed information about actual commissions and other benefits my adviser gets from making recommendations?

Yes. You have the right to know about the details of commissions and other benefits your adviser receives for recommending investments. We will provide this information when we provide you with our advice.

Will you give me the advice that is suitable to my needs, objectives and financial circumstances?

To deliver personalised advice to you, we need to find out what your financial situation is, and what your current and future objectives are.

You have the right to withhold private information from us, but this may compromise the effectiveness and suitability of any advice that we provide. In that case, we are required to warn you about the possible consequences of us not having your full personal information, which include the risk that the advice may not be appropriate.

You should read any warnings contained in the SoA or RoA carefully before making any decisions relating to financial products as these will be important.

While general advice can be provided instead of personal advice, the best results are achieved when the financial plan is tailored to meet your specific needs and objectives.

What should I know about any risks of the investments or investment strategies you recommend to me?

We will explain any significant risk involved in investments or strategies that we recommend to you. This explanation may be provided during the course of a meeting with your adviser or in a written SoA or RoA. You should ask us to explain these risks if we do not do so, or if you do not fully understand our explanation you should tell us and ask for further clarification.

What information do you maintain in my file, and can I access it?

We maintain a record of your personal profile that includes details about your circumstances and objectives, and we are committed to protecting this information and your privacy. We also maintain a record of any recommendations made to you.

If we provide you with further advice, after having previously provided you with a SoA, you may request a copy of that advice if you have not already been provided with a record of that advice. You may request a record of the advice by telephone, in writing, or in any other commonly used form of communication.

If you wish to examine the personal information contained on your file, you should ask us and we will make arrangements for you to do so.

Can I tell you how I wish to instruct you to buy or sell my investments?

Yes. You may specify how you would like to give us instructions (for example, in person, by telephone, fax or other means).

If we accept execution related telephone instructions this will be subject to prior agreement with your adviser. If telephone advice is given, you may request a record of the advice within 90 days of that advice being provided. We will then comply with that request as soon as possible.

We may request that you provide written instructions and may not act until those written instructions are received.

If you have any complaints

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms for our clients.

If you have any complaint about the service provided to you, you should take the following steps:

1. Contact your adviser and explain your complaint.
2. If your complaint is not satisfactorily resolved within 3 business days, please put your complaint in writing and send it to us at: C/- Compliance Manager, Grove Securities Pty Ltd, PO Box 738 Claremont WA 6910. We will try to resolve your complaint quickly and fairly. Complaints will be dealt with as a matter of priority and we will respond within 28 days of receipt by our Compliance Manager.
3. If you still do not get a satisfactory outcome you can contact the Australian Securities and Investments Commission (ASIC) at their free call info line on 1300 300 630 to find out which industry complaints scheme may be able to assist you in settling your complaint. Grove is a member of the Australian Financial Complaints Authority (AFCA) which can be contacted toll free on 1800 931 678. Alternatively, you can write to AFCA at info@afca.org.au or GPO Box 3, Melbourne VIC 3001. The AFCA website address is www.afca.org.au

What compensation arrangements does Grove Securities have in place?

We have taken, and will continue to take, all reasonable steps to ensure that we hold Professional Indemnity insurance cover that we believe meets the requirements of the Corporations Act (section 912B) and the National Credit Act to compensate persons who successfully claim for loss or damage suffered because of any breach by us or our representatives of our licence obligations.

Should you wish to sight our Professional Indemnity insurance policy, please ask us.

Privacy Policy

We are committed to ensuring the confidentiality and security of your personal information. We are also bound by the Privacy Act and the Australian Privacy Principles (**APP's**), which help govern how we collect, hold, use and disclose your personal information.

A summary of the APP's can be obtained from your local Grove office.

Our privacy Policy is intended to assist you in better understanding how your personal details are used and protected.

What is personal information?

As holders of an Australian Financial Services Licence, we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you (that is, 'personal information'). Our ability to provide you with a comprehensive financial planning and advice service is also dependent on us obtaining certain personal information about you. For example, this includes:

- Employment details, including remuneration and entitlements, and employment history;
- Details of your financial needs and objectives;
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
- Details of your investment preferences and aversion or tolerance to risk;
- Information about your family commitments and social security eligibility;
- Your Tax File Number; and
- Certain details in relation to estate planning, such as your family relationships, your estate planning goals, and existing arrangements.

What is sensitive information?

'Sensitive Information' is a particular type of personal information and includes such details as your personal health status, information about personal attributes (such as ethnic or racial origin), membership of organisations (such as trade unions) and any religious or political affiliations.

How and why we collect your personal information.

We are required, pursuant to the Corporations Act to collect sufficient information to ensure that appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information referred to above, it may expose you to higher risk in relation to the recommendations made to you, and may affect the adequacy or appropriateness of the advice we give to you.

We are also required to verify your identity and ensure compliance with *Anti-Money Laundering and Counter-Terrorism Financing Act*. This may require taking a copy of identification documents such as your driver's licence and/or passport, copies of relevant trust deeds, and constitutions.

In the course of acting as an insurance broker, we may also collect and retain personal information, including sensitive information, about you in order to assist in arranging personal risk insurance cover.

We will not collect any personal information about you except when you have knowingly provided that information to us, or authorised a third party to provide that information to us, and where we believe the information is reasonably necessary for, or directly related to, one or more functions or activities that we are expecting to perform.

We will not collect sensitive information about an individual unless that individual has consented to the collection and the information is reasonably necessary for, or directly related to, one or more functions or activities we are expecting to perform.

Generally, collection of your personal information will be effected in either face-to-face interview, over the telephone, by way of an online or paper form, email, or with third parties where your consent has been expressly given or implied by your conduct. From time to time, additional and/or updated personal information may be collected through one or more of these methods.

We collect, maintain and use personal information about you where it is necessary for us to adequately provide you the services you have requested, including:

- The preparation of your financial plan
- The provision of financial planning advice to you
- The provision of estate planning advice to you
- Making securities and investment recommendations
- Arranging loans or making recommendations about loans for you
- Reviewing all or parts of your financial plan
- Reviewing securities and investment recommendations
- Arranging life, income protection and other personal insurances
- Managing your, or your superannuation funds', financial affairs

From time to time, we may also collect your personal information through customer surveys or questionnaires for the purpose of obtaining your feedback on our services, providing further information to you about products or services that we provide, and the development of future product and service offers. In such cases, the completion of the survey or questionnaire is entirely your choice, and will only occur with your consent.

Any website that we operate must use 'cookies' which allow identification of your browser while you are using the site. 'Cookies' do not identify you, but simply allow us to track usage patterns so that we can measure the level of interest in various areas of the site. All browsers allow you to be notified when you receive a 'cookie' and elect to either accept it or not. Your Internet Service Provider should be able to assist you in setting your preferences.

Protection, storage and security of your personal information.

Your personal information is stored in both paper based and electronic form (including on software such as XPLAN which is owned and hosted by IRESS Ltd and data held with Microsoft 365), and we take all reasonable steps to ensure your personal information is safeguarded from misuse, loss, unauthorised access, alteration or disclosure. Under no circumstances will we sell your personal information.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

In the event that you cease to be a client of Grove, any personal information that we hold about you will be maintained in a secure storage facility for a period of 7 years (or other such period specified by law) in order to comply with legislative and professional requirements. At the end of that time, the information may be destroyed if permitted by law.

If we receive personal information about you and did not solicit the information, and we determine that it would not have been lawful to collect this information and this information is not contained in a Commonwealth record, then we will either destroy the information or ensure that the information is de-identified unless this is unlawful.

How we use your personal information.

We will not use or disclose personal information collected by us for any purpose other than in the circumstances outlined below:

- the purpose for which it was provided, or secondary related purposes in circumstances where you would reasonably expect such disclosure;
- where you have consented to such as disclosure, including consent implied by your conduct;
- where the APPs authorise use or disclosure where required or authorized under law, or in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We may be required by professional associations that we are member of to make certain information available for inspection on request, to ensure on-going compliance with mandatory professional standards. This may involve disclosure of your personal information.

We are also obliged, pursuant to the Corporations Act, to maintain certain transaction records and make these records available for inspection by the Australian Securities and Investments Commission (ASIC). Our records are usually also subject to annual external audit.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, newsletters, and invitations to client seminars or promotions. You may, however, request not to receive such information, and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your personal information to superannuation fund trustees, insurance providers and product issuers for the purpose of actioning your financial plan and recommendations made by us.

In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. You can be assured that all of our representatives will maintain your information in accordance with this policy. If you have any concerns in this regard, you should contact us.

We may disclose your personal information to certain contractors or third parties in order to assist or to facilitate giving effect to the delivery, administration or management of the financial plan or recommendations made by us. We may also permit access to your personal information when dealing with third party service providers, when this is necessary for the operation of our business and maintenance of services to you. Examples of the types of organisations to which we may disclose your personal information include:

- accountants for the purpose of specific taxation advice
- lawyers for the purpose of specific legal advice (such as estate planning)
- doctors or other medical service providers for the purpose of assessing any application for life insurance products
- organisations undertaking compliance reviews or reviews of the accuracy and completeness of our information
- organisations maintaining, reviewing or developing our business systems, infrastructure, procedures or computer systems

- organisations involved in printing our standard documents and correspondence and posting services
- organisations providing analysis and research
- organisations involved in issuing, payment of and recording of, client invoices

We will make all reasonable endeavours to ensure that your information will be securely maintained by any contractor or third party to whom it is disclosed in accordance with this Privacy Policy and the APPs. Many of these third parties will also hold Privacy Policies, which can be accessed from the providers' website, or will otherwise be available upon request to them. If you have any concerns in this regard, you should contact us.

In the event that we propose to sell all or part of the assets or business of Grove Securities, we may disclose your personal information to potential purchasers for the purpose of allowing them to conduct diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client, you will be advised of any such transfer.

Any website that we operate may contain links to other websites whose operations may or may not adhere to a privacy policy or be governed by the APPs.

We will not adopt a government related identifier, such as your tax file number or Medicare number, as our own identifier for you.

How you can access your personal information

You may, at any time, contact us to request access to your personal information. We will (subject to the following exceptions) provide you with access to that information – either by providing you with copies of the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to your personal information if:

- providing access would be unlawful
- denying access is required or authorised by or under law
- providing access would pose a serious threat to the life or health of a person
- providing access would have unreasonable impact on the privacy of others
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- the request for access is frivolous or vexatious
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body, or an enforcement body requested that access not be provided on the grounds of national security

In the event that we refuse you access to your personal information, we will provide you with an explanation of that refusal.

We will endeavour to respond to any request for access within 30 days, depending on the complexity of the information and/or request. If your request is urgent, please make this clear to us.

Updating and correcting your personal information

We will endeavour to ensure that, at all times, the personal information we hold about you is kept up to date and accurate. In the event that you become aware of, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us and provide us with evidence of the inaccuracy or

incompleteness. If we agree that the information requires correcting, we will take all reasonable steps to correct that information.

If we do not agree that your personal information requires correcting, we must, if you request, take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are not satisfied as to the accuracy or completeness of that information.

Privacy complaints

If you wish to complain about any breach, or potential breach, of this Privacy Policy or the APPs, you should contact us and request that your complaint be directed to the Compliance Manager. Your complaint will normally be considered within 7 days but it may take up to 28 days to be responded to. It is our intention to make every reasonable effort to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further. The contact details of the Privacy Commissioner are:

Privacy Commissioner
GPO Box 5218
Sydney NSW 2001
Phone: 1300 363 992

Will we disclose personal information to overseas recipients?

We are unlikely to disclose your personal information to overseas recipients. However, circumstances such as those listed below may give rise to such disclosure.

- If you open an account with an overseas business. For example, if opening an account to buy and sell direct shares on foreign exchanges, we may assist you in this process by providing your relevant personal details. We would expect you to be aware of this and to approve disclosure before it was made.
- Where we use contractors or third parties in order to assist or to facilitate giving effect to the delivery, administration or management of the financial plan or recommendations made by us, or where we use third party service providers in the operation of our business and for maintenance of services to you, and they in turn have operations or deal with other third parties located overseas. Many of these third parties will also hold Privacy Policies, which can be accessed from the providers' website, or will otherwise be available upon request to them.

We will make all reasonable endeavours to ensure that your information will be securely maintained by any contractor or third party to whom it is disclosed in accordance with this Privacy Policy and the APPs.