

PRIVACY POLICY

At Grove Securities, we are committed to ensuring the confidentiality and security of your personal information. We are bound by the Privacy Act and National Privacy Principles (NPP's) regulated by the Federal Privacy Commissioner.

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

We would like to explain our Privacy Policy to you so you can better understand how your personal details are used and protected.

What is personal information?

As holders of an Australian Financial Services 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"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you. This includes:

- employment details, circumstances 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
- some details in relation to estate planning.

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 and Rules of Professional Conduct of the Financial Planning Association of Australia Limited, 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 risks in relation to the recommendations made to you, and may affect the adequacy or appropriateness of the advice we give to you.

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.

Generally, collection of your personal information will be effected in either face-to-face interviews, over the telephone, or may be by way of an online Engagement Form. 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 to you the services you have requested, including:

- a) the preparation of your financial plan;
- b) the provision of financial planning advice to you;
- c) the provision of estate planning advice to you;
- d) making securities and investment recommendations;
- e) arranging loans for you;
- f) reviewing all or parts of your financial plan;
- g) reviewing securities and investment recommendations;
- h) arranging life, income protection and other personal insurances;
- i) 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" that allow identification of your browser while you are using the site. "Cookies" do not identify you: they 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 generally held in your Client File. Information may also be held in a computer database.

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorized access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All paper files are stored in lockable cabinets or rooms that are kept locked out of hours. All record movements off-premises are recorded in a central register. Access to our premises is controlled. All computer-based information is protected through the use of passwords on each computer. Data is backed-up each evening, and stored securely off-site.

In the event that you cease to be a client of Grove Securities, any personal information that we hold about you will be maintained in a secure storage facility for a period of 7 years in order to comply with legislative and professional requirements. At the end of that time, the information may be destroyed.

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.

- a) the purpose for which it was provided, or secondary related purposes in circumstances where you would reasonably expect such a disclosure; or
- b) where you have consented to such a disclosure; or
- c) where the National Privacy Principles authorize use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required, under the Rules of Professional Conduct of the Financial Planning Association of Australia Limited, to make certain information available for inspection by the Association 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 those records available for inspection by the Australian Securities and Investments Commission (ASIC). Our records are also subject to 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 the 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 authorised representatives who will be your primary point of contact with the organization. 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 representatives of Grove Securities 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. 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 seek to make it a condition of our agreement with each of our external contractors or third parties that they adopt and adhere to this Privacy Policy. We will make all reasonable endeavours to ensure that your information will be maintained by any contractor or third party to whom it is disclosed in accordance with this Privacy Policy and the National Privacy Principles. 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 due 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 effected, 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 operators may or may not adhere to a privacy policy or be governed by the National Privacy Principles.

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 an 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 requests 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 14 to 30 days, depending on the complexity of the information and/or request. If your request is urgent, please indicate this clearly.

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 National Privacy Principles, you should contact us and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and 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 details are below.

Privacy Commissioner
133 Castlereagh Street,
Sydney N.S.W. 2000
Phone: 1300 363 992