

Privacy Policy

March 2021

About Us

WiZTEC Pty Ltd ACN 623 252 504, the operator of www.wizdomcentral.com.au (**the Website**), and our related entities recognise the importance of privacy protection and to the extent required comply with the Australian Privacy Principles (as amended or replaced from time to time) set out in the Privacy Act 1988 (Cth) (**Act**).

As we are an Australian company, you are protected by Australian privacy laws. Further information on the same can be found from the Australian Information Commissioner through the following website - www.oaic.gov.au

Overview

Protecting our clients' privacy is very important to us. To ensure our compliance with the Privacy Act and as part of our commitment to ensuring the safety of your private and confidential information, we have established and implemented this Policy.

Introduction

Some of the information you provide us as part of your dealings with us may be "personal information" under the Act. This Privacy Policy sets out how we collect, use, and disclose your personal information and applies to you unless you give us explicit consent to act otherwise. The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles (APPs), which regulate the collection, use, correction, disclosure, and transfer of personal information about individuals by organisations like us in the private sector.

Policy Statement

The Policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the APPs.

Definitions and key concept

Australian law

means an Act of the Commonwealth or of a State or Territory or regulations, or any other instrument, made under such an Act.

Australian Privacy Principle or APP

means the Australian Privacy Principles set out in Schedule 1 of the Privacy Act.

Breach	means an act or practice which is contrary to or inconsistent with the Privacy Act, including an APP.
Collect	means to collect personal information, usually for inclusion in a record.
Consent	means express consent or implied consent.
GDPR	means the General Data Protection Regulation (EU) 2016/679.
Health information	means personal information about the health of an individual, an individual's expressed wishes about the future provision of health services to the individual, or a health service to be provided to an individual.
Holds	means possession or control of a record that contains personal information.
Individual	means a natural person.
Know Your Customer or KYC	means the process of verifying a customer's identity (as required by the <i>Anti-Money Laundering and Counter-Terrorism Financing Act 2006</i> (Cth)) by using reliable and independent documents and information.
Notifiable Data Breaches Scheme	means the scheme under Part IIIC of the Privacy Act which requires that, in the event personal information is involved in a data breach that is likely to result in serious harm, we must notify each affected individual and the Australian Information Commissioner.
Overseas recipient	means a person who receives personal information who is not in Australia or an external Territory, not us or a subsidiary or associate of us, and not the individual to whom the personal information relates.

Personal information	<p>means information or an opinion about an identified individual, or an individual who is reasonably identifiable:</p> <p>(a) whether the information or opinion is true or not; and</p> <p>(b) whether the information or opinion is recorded in a material form or not.</p>
Policy	means this Privacy Policy.
Privacy Act	means the <i>Privacy Act 1988</i> (Cth).
Privacy Officer	<p>means the IOOF privacy officer, responsible for managing the business impacts of privacy laws and policies across the</p> <p>IOOF group of companies. Refer to section 5 of this Policy for contact details.</p>
Reasonable Steps	means the actions or efforts we undertake to comply with the Privacy Act and the APPs, which must be objectively reasonable in the circumstances.
Sensitive information	<p>means personal information about an individual's:</p> <ul style="list-style-type: none"> • racial or ethnic origin • political, philosophical, or religious beliefs or opinions • memberships or affiliations • sexual preferences or practices • criminal record • health or genetic information • biometric information.
Solicit	means to request personal information, or anything that includes personal information, from someone other than the individual.
Tax file number or TFN	means a tax file number as defined in Part VA of the <i>Income Tax Assessment Act 1936</i> (Cth).

Use

means to handle, manage, or undertake an activity with personal information in our effective control.

What types of personal information do we collect?

We will only collect information about you that is reasonably necessary for us to perform our functions and activities. We will collect your name and email address so that we can register you to use the Website. Other personal information we collect from you will depend on what information you choose to disclose to us and how you use the services provided through the Website. Other personal information we may collect from you at your discretion includes your postal address, telephone number/s, Website account passwords, credit card number, bank account details, personal legal or other documents (such as bank statements and loan facilities), and specific information required for a Third-Party Provider to supply you with information, products, or services you wish to receive. We will not use any government related identifiers to identify you in our records although information we hold about you may include government related identifiers (such as tax file number) entered by you in using our services.

How do we use your personal information?

We will use your personal information for the purpose disclosed at the time of collection, or otherwise as set out in this Privacy Policy. Except as specifically set out in this Privacy Policy, we will not sell or disclose your personal information to any person located in Australia or overseas or use your personal information for any other purpose without your prior consent, unless authorised or required by or under Australian law or a court/tribunal order. Generally, we will only use and disclose your personal information for the following purposes:

- to provide you with information you request about us or the products or services we offer through the Website.
- to provide information to persons expressly authorised by you.
- to manage the Website (including your User Account).
- to provide products or services you request from time to time.
- to access or directly link to Third Party Websites.
- to understand your needs and Website usage to help us improve the Website, our marketing, or the way we do business.
- if necessary, in legal proceedings or in connection with confidential alternative dispute resolution; and

We may also disclose your personal information to Third Party Providers from which you wish to receive information, products, or services (including financial products or services) to:

- facilitate communications between you and those Third-Party Providers; and
- provide those Third-Party Providers with the information necessary for them to supply you with the information, products, or services you wish to receive.

A Third-Party Provider may include a service provider with whom we have a business arrangement to offer you access to the Website. The Third-Party providers with whom we have a business arrangement are WiZDOM Loans, WiZDOM Accounting and WiZDOM Advisory all within the WiZDOM Group and Investor Pacific Structures (IPS) and Pacific Law. In that case, you agree that the Third-Party Provider may upload materials to your User Account and will have full access (including editing capability) to all materials you upload to the Website or the Referring Provider uploads on your behalf.

We will only disclose your personal information to Third Party Providers you choose to deal with. You acknowledge and agree that Third Party Providers may be unable to provide you with the information, products, or services you wish to receive if we do not disclose your personal information to them.

From time to time, we may also ask you to participate in surveys or questionnaires. These help us to improve our levels of service and to maximise the opportunities and benefits you can enjoy.

We may also send you other electronic messages updating you about products, services, offers and special offers. We will only send you such electronic messages if you have consented to receive them or it can be inferred from your existing business or other relationship with us, that there is a reasonable expectation of receiving those electronic messages. All electronic messages will identify us.

We do not collect or store your bank account information for direct debit purposes.

How do we use information that is not personal information?

From time to time, we may sell or disclose information you provide us that is not personal information or does not disclose your identity to any person for any purpose at our sole discretion, including to people or companies located outside of Australia. For example, we may sell, disclose, or use information you provide us that is not personal information to determine what advertising, promotional materials, products, or services are likely to be of most interest to you and to assist merchants and other third parties to monitor general consumer trends in various areas.

How do we collect your personal information?

We collect your personal information from information you provide directly to us when you set up a User Account and register to use the Website, contact us, participate in surveys or questionnaires and from information you upload to the Website from time to time. Except as provided below, we will only collect personal information about you from you directly unless it is unreasonable or impracticable for us to obtain the information in this manner. On occasion, your WiZDOM Loans Finance Strategist, WiZDOM Accounting Accountant, WiZDOM Advisory Financial Adviser, IPS Representative or Pacific Law Solicitor or staff members of any of the abovenamed businesses may add information about you

What happens if you do not provide us with the information we require?

If you do not provide us with certain information, we may be unable to provide you the information, products, or services you wish to buy or receive.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However, in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym given the nature of the facilities and services we offer.

Personal information security

We will take reasonable steps to ensure your personal information is protected from risks such as loss, interference, unauthorised access or use, destruction, modification, or disclosure. Aside from the disclosure or transfer of your personal information as specified in the "Where your information is stored" section below, we

will only permit our authorised personnel and other personnel authorised by you to access your personal information. The Internet is not a secure method of transmitting information. Accordingly, we cannot accept responsibility for the security of information you send to or receive from us over the Internet or for any unauthorised access, use or modification of that information. The Website may provide links or references to other 3rd party websites and resources. These websites and resources are not subject to this Privacy Policy. You should review the privacy policy of each 3rd party website and resource accessed via links from our Website and assess whether the policy of each website and resource is satisfactory to you before you use the website or resource. You acknowledge and agree that we are not responsible for any personal information you choose to disclose, or permit us to disclose, to a Third-Party Provider or to a 3rd party through a 3rd party website referred to by or linked to our Website and that such Third-Party Providers and 3rd parties may store your personal information in any location in accordance with their own security standards.

We will comply with the notification and other requirements of the Act where your personal information held by us has been inadvertently lost or disclosed or improperly accessed and that loss, disclosure or access may result in serious harm to you.

Using 3rd parties to process your information

We may occasionally use third party companies (third party service providers) to manage information that you provide. When we use third party service providers, to the extent practicable, we keep the amount of personal information they hold to a minimum, have contracts in place to stop them using your information except on our behalf and obviously use reasonable efforts to make sure they are as careful with your information as we are.

Where your information is stored

Subject to the below, personal information we collect from you is stored securely on servers in Australia.

For us to provide you with the services offered through the Website we may be required from time to time to: (a) use your Materials to access or directly link to Third Party Websites (b) disclose your Materials to Third Party Providers; (c) retrieve information from Third Party Websites about you; We currently engage AWS (Amazon Web Services) Head Office location 410 Terry Avenue North, Seattle, WA 98109-5210, to provide us with the resources necessary for us to perform the above actions. We will disclose your personal information to AWS to the extent necessary for it to provide the resources and assistance we need to perform the above actions and that you need to use the Website and the products and services offered via the Website. Servers in which your information (including personal information) is stored by AWS are currently located in Sydney although additional or other locations may be used by AWS in the future. If AWS, or any other third party we may engage from time to time to provide similar or equivalent services to AWS (**Similar Provider**), stores your personal information outside Australia, the Act requires us to ensure that they comply with applicable Australian privacy laws unless you agree otherwise. By providing us with information (including personal information), registering to use the Website, using the Website, uploading any Materials or information to the Website or obtaining any products or services provided via the Website, you: (i) consent to us disclosing and transferring your information (including personal information) to AWS and any Similar Provider; (ii) consent to AWS and any Similar Provider storing your information (including personal information) on servers located outside of Australia; and (iii) agree that the requirement under the Act for us to ensure that AWS and our Similar Providers comply with applicable Australian privacy laws in respect of your information (including personal information) does not apply if AWS or our Similar Provider stores personal information outside of Australia.

We suggest that you visit our Website regularly to keep up to date with any changes.

Your rights of access and correction

You have the right to access personal information which we have collected from you within the requirements of the Act. We will respond to any access request within a reasonable period.

If you wish to access your personal information or believe that any of the personal information, we hold about you is inaccurate, incomplete, irrelevant, out-of-date, or misleading, please contact us at the email address shown at the bottom of this Privacy Policy. If reasonable and practicable to do so, we will provide access in the form requested by you. We will take reasonable steps to correct any inaccurate, incomplete, out-of-date, irrelevant, or misleading personal information if you request us to do so, where required by law. If we decline to make the requested amendment for reasons permitted by the Act, if you ask us to do so, we will include a note with that personal information in your file that you have requested it to be amended.

We may withhold or refuse you access to your personal information if we are legally authorised to do so or where its disclosure to you is restricted by law, is the subject of legal action, or may compromise the privacy of another person. We will give you written reasons explaining why we have refused access, or refused access in the form you have requested, unless it would be unreasonable to do so, having regard to the reasons for our refusal.

We may charge you a reasonable fee to access your information as permitted by applicable law.

How do we protect the security of your information?

We have security systems, practices, and procedures in place to safeguard your privacy. We may use cloud storage or third-party servers to store the personal information we hold about you. These services are subject to regular audit and the people who handle your personal information have the training, knowledge, skills, and commitment to protect it from unauthorised access, disclosure, or misuse.

When you use this service, we will verify your identity by your username and password. Once verified, you will have access to secured content. You are responsible for maintaining the secrecy of your login details.

Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact your aligned finance professional if you would prefer to not use WIZDOM Central

Cookies

"Cookies" are small data files sent by a website and stored on your computer's hard drive when you visit the website. A cookie can contain certain information that the website uses to track the pages you have visited. The only personal information a cookie can contain is information you personally supply. A cookie cannot read data off your hard disk or read cookie files created by other websites. Our Website uses cookies to assist with managing your User Account and to identify you on return visits. Most Internet browsers automatically accept cookies, but you can usually change your browser to notify you when you receive a cookie or to reject cookies. However, while most of the content of our Website can be viewed without accepting cookies, full functionality for the Website requires the use of cookies.

European Union General Data Protection Regulation (GDPR)

If you reside in a country that is a member of the European Economic Area (the EU and Norway, Lichtenstein, and Iceland), in addition to the protection you receive under the Privacy Act, you are entitled to other protections provided by the GDPR, including, in certain circumstances, the right to:

- have your personal information erased
- access your personal information in an electronic and portable format
- restrict or object to the processing of your personal information.

Roles and Responsibilities

WiZTEC Pty Ltd is ultimately responsible for overseeing the Policy.

The Privacy Officer is responsible for updating this Policy and for managing the business impacts of privacy laws across WiZTEC Pty Ltd.

Complaints and breaches

If you believe that we have breached the APPs by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are below.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a Privacy Complaint with the Australian Information Commissioner. For more information, please visit the Australian Information Commissioner's website.

If you have a complaint about a breach of the GDPR, you may contact the local regulator in your European Economic Area.

We are committed to helping you have control of your personal information and so it is our practice to take reasonable steps to notify you if we are aware that we have breached your privacy.

In accordance with the Notifiable Data Breaches Scheme, if your personal information is involved in a data breach that is likely to result in serious harm to you, we will notify you and the Australian Information Commissioner.

Contacting the Privacy Officer

You can contact the Privacy Officer by mail or email:

Privacy Officer
WiZTEC Pty Ltd
PO Box 285 Maitland NSW 2322

wizdomcentral@wizdom.com.au

Changes to this Privacy Policy

We may amend this Privacy Policy from time to time by posting the amended version on our Website at XXXXXXXX
We suggest that you visit our Website regularly to keep up to date with any changes.

Contacting us

If you would like more information about this Privacy Policy or if you have any queries, please contact us by email at wizdomcentral@wizdom.com.au and we will take reasonable steps try to respond to you as quickly as practicable.

Last updated: 23 March 2021