



LIFESTYLE ASSET MANAGEMENT



Privacy Policy



Privacy Policy

Our Commitment

Lifestyle Asset Management Pty Limited ("LAM") and its representatives understand the importance of your privacy and are committed to protecting it. LAM abides by the Australian Privacy Principles (APPs) administered by the Office of the Australian Information Commissioner (OAIC) under the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

The purpose of this statement is to inform you how the personal information that you provide to LAM or its representatives is collected, held, used, corrected and disclosed. You may request more information about the way we manage your personal information by contacting LAM as set out in the last section of this policy. A summary of the APPs is available by contacting LAM or your adviser.

Collection

As a financial planning organisation, we collect personal information from clients and, with their authority, from third parties during the course of our activities and record it to facilitate financial planning activities, insurance policies or related services.

In addition to the privacy legislation described above, we are subject to legislative and regulatory requirements under the Corporations Law and the Code of Ethics established by Financial Adviser Standards and Ethics Authority (FASEA), which require that we obtain sufficient information to ensure that appropriate advice can be given. Our ability to provide appropriate financial planning advice is dependent upon us obtaining complete and accurate personal information.



Personal Information comprises information that allows you to be identified. It includes your name, age, gender, contact details and also the following details:

- financial needs and objectives;
- current financial circumstances, including your assets and liabilities (actual and potential), income, expenditure, etc;
- investment preferences and aversion to, or tolerance of risk;
- employment history, employment circumstances;
- family structure, commitments and social security eligibility, and
- any other relevant information including medical history or reports.

LAM and its representatives will only collect, maintain and use personal information about you that is necessary to provide the services that you have requested.

Circumstances in which this may be necessary include:

- preparation of a strategy document or a statement of advice;
- provision of financial planning advice;
- making securities and investment recommendations;
- reviewing your financial plan;
- reviewing securities and investment recommendations; and
- renewing or advising on new risk insurance requirements.

Personal information will generally be collected in face to face interviews, over the telephone or from a secure client portal. From time to time additional and/or updated personal information may be requested to ensure that our records are accurate and current. Where reasonable and practicable, we will only collect personal information about you from you or from third parties with your written authorisation.



Use and disclosure

We will not use or disclose personal information collected by us for any purpose other than:

- 1.the purposes for which it was provided, or secondary related purposes in circumstances where you would reasonably expect such use or disclosure;
- 2.where you have consented to such disclosure;
- 3.where the Australian Privacy Principles authorise use or disclosure in circumstances relating to public health and safety, and in connection with certain operations by or on behalf of an enforcement body;
- 4.where we are 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.

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 any representative will maintain your personal information in accordance with this policy. If you have any concerns in this regard, you should contact LAM by any of the methods detailed at the end of this policy.

Data Quality

We are required, pursuant to the Corporations Act 2001, Code of Ethics and Standards, to collect sufficient information to ensure appropriate advice can be given to our clients. If you elect not to provide us with personal information relevant to the advice, you may be exposed to higher risks in respect of our recommendations and this may affect the adequacy or appropriateness of advice given to you.



Data Security

Your personal information is generally held in your client file, which may be held in an electronic database. We will at all times seek to ensure that personal information collected by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and sensitive information is treated as highly confidential. Access to our premises is restricted and information stored electronically is protected by long strong passwords and multi factor authentication. Data is backed up regularly and stored securely.

If you cease to be a client of this organisation, personal information which we hold will be maintained in secure storage for a period of 7 years, in accordance with legislative and professional requirements. After a period of 7 years, the information will be destroyed.

Openness

We are committed to being open about how we use personal information. When we ask for personal information, we will generally state the purposes for its use and to whom we may disclose it.

Access and correction

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



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

1. Providing access would pose a serious threat to the life or the health of a person;
2. Providing access would have an unreasonable impact on the privacy of others;
3. The request for access is vexatious or frivolous;
4. The information relating to existing or anticipated legal proceedings between us would not be discoverable in those proceedings;
5. Providing access would reveal our intentions in relation to negotiations with you in such a way to prejudice those negotiations;
6. Providing access would be unlawful;
7. Denying access is required or authorised by or under law;
8. Providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that information not be provided on the grounds of national security.

In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal. We will endeavour to respond to any request for access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

We will endeavour to ensure that at all times, the personal information about you that we hold is up to date and accurate. In the event that you become aware, or believe, that any of the information that we hold about you is inaccurate, incomplete, or out dated, you may contact us and provide evidence of the inaccuracy or the incompleteness or out datedness. We will take all reasonable steps to correct the information if we agree that the information requires correcting.



Identifiers

We will not use as our means of identifying you any identifiers that you provide to us, such as Tax File Numbers, Medicare numbers etc. The Anti-Money Laundering and Counter Terrorism Financing Act 2006 requires that you may be “identified” before investing in a financial product. What this means is that you may be required to produce documentary evidence to confirm your identity. Your adviser will explain these requirements to you if and when appropriate.

Privacy Complaints

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us as detailed below. If you are not satisfied with how we handle your complaint, you may request that your complaint be directed to LAM's Compliance Officer. Your complaint will be investigated and you will be issued with an acknowledgment of your complaint within 14 days of receipt of your complaint.

It is LAM's intention to use best endeavours to resolve any complaint to your satisfaction. However, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner on 1300 363 992 or online at www.oaic.gov.au, who may investigate your complaint further.



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Contact Information :

 1300 226 271

 ACN 113 067 968

 www.lamfs.com.au

 AFSL 288421

 Level 35, 100 Barangaroo Avenue
Sydney NSW 2000

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