



Chrysalis Lifestyle Planning Privacy Policy

Your privacy matters to us. This Privacy Policy (the Policy) outlines how Chrysalis Lifestyle Planning (CLP) ABN 22 127 418 982 manages your personal information. Privacy laws apply to how we collect, maintain, use and disclose your personal information. It is CLP's policy to respect the confidentiality of information and the privacy of individuals generally. CLP is bound by the Privacy Act 1988 including the Australian Privacy Principles. CLP's Privacy Policy will be reviewed from time to time to take into account new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current CLP Privacy Policy.

Organisations To Which This Policy Applies

The CLP Privacy Policy also applies to Chrysalis Financial Services Pty Ltd ABN 99 109 688 860. It is also possible that other entities might become associated with CLP from time to time. If that occurs, this policy would also apply to those entities.

Privacy Policy is Based on Openness

CLP is committed to being open about how personal information is stored and used. Your personal information will be collected and held by staff and related entities of CLP, an Australian Financial Services and Credit Licensee.

Why Must Personal Information Be Collected?

CLP's business requires it to understand customer's needs and to meet those needs by the provision of a broad range of financial and other services. To achieve this outcome, personal information needs to be collected. We also need to collect personal information to satisfy certain legal obligations.

CLP undertakes to only collect personal information that is reasonably necessary to achieve these ends. In most cases, your personal information will be collected when you meet with your adviser, or you provide your information to us via telephone or electronic and written material. In some instances, your information may also need to be collected from third parties such as your employer if you are a member of a corporate superannuation plan. Other third parties may include, but may not be limited to, accountants, mortgage brokers, solicitors or insurance providers.

What Kind of Personal Information Do We Hold?

Due to the nature of the products and services we provide, government regulations and taxation laws, we need a range of personal information from our customers. The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, employment details and any other information we consider necessary provided by you or by others nominated by you. We may also collect and retain information regarding your education, credit history, professional vocation and experience and we may potentially collect sensitive information. For more details, see the section 'Sensitive Information Is Subject To Greater Restrictions'.

The information we need to collect is a function of the products and services we provide to you. In some circumstances, we may also need to collect information regarding your dependents and beneficiaries.

We obtain most of the information directly from you through applications or other forms you complete for us. This is all information we need to provide products and services to you. If you choose not to provide the necessary information, we may not be able to do work for you.

How Do We Collect Your Information?

As mentioned, we generally collect your personal information from you. However, we may collect the information from third parties where it is unreasonable or impractical to collect it from you. Such third parties may include your accountant, solicitor or your employer for superannuation purposes. Where we collect personal information from third parties, we will seek your approval before collecting such information.

We may also collect your information from publicly available sources or from third parties as required by law. If you are a minor (under 18 years of age) and you wish to obtain products and services from CLP, we may be required to obtain information from your legal guardian. Where you have provided us with your contact details, personal information or requested our services via our website, we may keep a record of your information.

How Do We Use This Information and Whom Might We Disclose It To?

Unless you are informed otherwise, the personal information we hold is used for the primary purpose being the provision of financial planning and credit advice services as well as reviewing your ongoing needs from time to time. We may also use your personal information for secondary purposes such as: enhancing customer service and product options; communicating with you regarding the products and services you have with us; handling your complaints; and giving your ongoing educational information, newsletters or opportunities that we believe may be relevant to your financial needs and circumstances. We also use the personal information we collect about you to fulfil our legal obligations.

We will only disclose personal information to third parties for the primary purpose outlined above. We will not release your information for any other purpose unless permitted by the Privacy law and with your consent. You may provide the consent in writing, or via telephone. Depending on the products or services concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Other areas within the CLP group, who provide financial and other services.
- Financial planners, brokers and those who are authorised by CLP to review customers' needs and circumstances from time to time.
- Service providers and specialist advisers to CLP who have been contracted to provide CLP with administrative, financial, insurance, accounting, legal, information technology, research or other services.
- Other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law.
- Credit reporting or reference agencies or insurance investigators.
- Organisations or individuals in connection with the sale or proposed sale of all or part of the CLP business and/or your adviser's business and to the use of that personal information by those organisations or individuals for the purpose of ongoing financial or credit advice.

- AUSTRAC, the government agency who oversees Anti-Money Laundering and Counter Terrorism. Before we arrange products or services, we are required to validate client identity. We will request and copy some personal documents both in the initial phase and on an ongoing basis. We are also required to provide details of entities and certain transactions where we hold reasonable suspicion of reportable suspect matters.
- Relevant external dispute resolution bodies who would handle your complaint.

Generally, CLP requires that organisations outside CLP who handle or obtain personal information as service providers to CLP acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the privacy laws.

Disclosing Your Personal Information Overseas

Generally, CLP does not disclose your personal information to overseas countries. CLP does however use technology and service providers who may be either based overseas or back up data in overseas facilities. Your personal information is disclosed to such organisations so that we can provide you with products and services. CLP also uses data storage services which may be based in overseas countries. We take reasonable steps to ensure that the overseas companies have secure processes in place to protect your information against unlawful access.

Marketing Opt Out

You can inform us if you do not wish to receive marketing materials from CLP.

Sensitive Information is Subject to Greater Restrictions

Some personal information we hold can be classified as 'sensitive'. Sensitive information typically relates to a person's racial or ethnic origin, membership of political associations or trade unions, religious affiliations, sexual orientation or practices, criminal record, health information, medical and genetic history. Sensitive information is usually needed for applications for personal insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is CLP's policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless you agree otherwise or the use or disclosure of this information is allowed by law. If we require sensitive information, the reason for the request will be explained to you and it will only be done where it is reasonably necessary to provide you with product or service and with the upmost care and sensitivity.

Management of Personal Information

CLP takes the confidentiality of your personal information very seriously. All staff members are trained to treat your personal information with care and respect for its confidentiality. Where breaches of privacy occur, CLP will impose appropriate penalties on staff up to and in some cases, including dismissal. CLP has appointed a Privacy Officer to ensure that CLP's management of personal information is in accordance with this Privacy Policy and the Privacy Act.

How Do We Store Personal Information?

Safeguarding the privacy of your information is important to CLP regardless of how it is collected. We may collect personal information when we interact with you personally, by phone, mail, over the internet, or other electronic medium. We hold personal information in a combination of electronic (in Australia and overseas) and paper-based files and take steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure. Some of the steps we take to protect your private information include encrypted password protected electronic files and secure locked storage of paper files.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

You Have The Right To Check What Personal Information About You Is Held By Us

Under the Privacy Act, you have the right to access any personal information which CLP holds about you. Additionally, you can also advise CLP of any inaccuracies in that information. The Act does set out some exceptions to this. If you wish to look at your personal information, you will need to submit your request to us in writing, verifying your identity and specifying what information you require. CLP will respond to your request within 14 days. CLP may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the information sought is extensive, CLP will advise the likely cost in advance and can help to refine your request if required.

Correction of Your Information

CLP tries to ensure that your personal information is accurate and up-to-date. CLP understands that due to its nature, this information may change from time to time. You must notify us if there have been changes to your situation. Additionally, you can ask us to correct the information if it is inaccurate in any way. CLP will action your request in a timely manner.

What If You Have A Complaint?

If you consider that any action of CLP breaches this Privacy Policy, the Australian Privacy Principles or otherwise fails to respect your privacy, you can make a complaint. Upon lodgement of a complaint with CLP, you will receive an acknowledgement of the complaint being received by CLP and an indication of the timeframe in which CLP will respond to your complaint. We will try to resolve your complaint within 45 days. When this is not possible, we will inform you of the reasons for the delay.

To make a complaint, please forward it in writing to:

Complaints Manager
Chrysalis Lifestyle Planning Pty Limited
Suite 3, 12-14 Fisher Road
Dee Why NSW 2099
Email: info@chrysalislp.com.au
Phone: (02) 9972 2633
Fax: (02) 9972 2833

If you are not satisfied with our response to your complaint, you can access The Credit Ombudsman Service Limited (COSL) which can deal with most privacy complaints involving financial service providers. COSL can be contacted at:

Credit Ombudsman Service Limited
PO Box A252
South Sydney NSW 1235
Email: info@cosl.com.au
Phone: 1800 138 422

You may also apply to the Office of the Australian Information Commissioner (OAIC) to complain about the way we handle your personal information. OAIC can be contacted at:

Office of the Australian Information Commissioner
GPO Box 5218
Sydney NSW 2001
Email: enquiries@oaic.gov.au
Phone: 1300 363 992