

# PRIVACY POLICY AND DISCLAIMER

## PART A – PRIVACY STATEMENT

Venture Financial Planning Pty Ltd ('Venture') [ABN 62 095 194 559] understands that privacy is important to you. Protecting your personal information is important to us.

This Policy explains how Venture handles personal information and comply with the requirements of the Privacy Act 1988 ("Privacy Act"). This policy relates to Venture's collection and handling of personal information that is covered by the Privacy Act. It is not intended to cover categories of personal information that are not covered by the Privacy Act.

### **What does personal information mean?**

Personal information is any information about you that identifies you or by which your identity can be reasonably determined.

### **Collection of personal information**

Venture collects personal information from clients, customers, employees, contractors and other people. Venture collects and holds this information when it is necessary for business purposes. Your personal information is generally held in client files or on a computer database. Your personal information may also be held in a secure archiving facility.

Personal information which Venture collects includes but is not limited to name, address, job title, tax file numbers, financial institution details, phone numbers, email addresses and shareholding balances. In the course of providing tax, accounting, business services and related services to our clients, we may collect and hold more detailed personal information, for example financial information when we are engaged to perform services.

The information we collect is generally, but not necessarily, obtained directly from you when we first deal with you or from an application or other form completed by you, and from subsequent face to face meetings, email messages, telephone conversations and from third parties. On occasion an Issuer or security brokers may also provide this information. If you contact us we may keep a record of that contact.

If we are not able to collect all of this information, we may not be able to provide to you with a complete and accurate service.

Due to the nature of the services Venture provides it is generally impractical for Venture to deal with you anonymously.

## **How we use your personal information**

Venture only uses your personal information for the purpose for which it was collected and to offer and provide related services that are connected to that initial purpose. This includes for example, providing Issuers with registry and registry related services, or notifying you about other Issuer or Venture services.

The purpose for which we collect, hold, use and disclose personal information are:

- to provide our service to you
- to respond to your requests
- to maintain contact with you
- to keep clients and other contacts informed of the services we offer and industry developments and seminars that may be of interest to you
- for general management and reporting purposes, such as invoicing and account management
- for recruiting purposes
- for purposes relating to the employment of our personnel and providing internal services to our employees
- for other purposes related to our business.

If you choose not to provide us your personal information we may be unable to perform such activities.

We may collect, hold or use information about individuals to market our services, including by email. You may opt out of marketing services at any time by writing to the Marketing Co-ordinator PO Box 928 Bendigo, 3552 or emailing us at [venture@venturebendigo.com.au](mailto:venture@venturebendigo.com.au) Please allow for 28 days for your request to be processed.

If we contact you via email, you may send a return email to notify us that you do not want to receive further marketing information from us via email.

## **Security of personal information**

The policy of Venture is to only collect information in a way that is lawful, fair and is not unreasonably intrusive.

Venture will endeavour to take reasonable precautions to ensure the security of personal information held by it, whether electronically or in hard copy, from such risks as loss or

unauthorised access, destruction, misuse, modification or disclosure. Your personal information is retained by us in the cloud or other types of networked or electronic storage or in hard copy files on-site. When your documents are no longer needed we either arrange for them to be shredded or we store them at reputable off-site security storage facilities.

Venture aims to achieve industry best practice in the security of personal information which it holds. It is our policy not to retain personal information once there is no longer a legal or business need for us to do so.

### **Data Security Breaches**

When addressing any data security breaches, Venture will take into consideration the 'Data Breach Notification Guidelines' published by the Office of the Australian Information Commissioner.

### **Will we provide your personal information to anyone else?**

We will provide information to AFS & Associates Pty Ltd access to your information to provide you with the product and service which you have requested as they are the lodging agent.

Venture does not routinely disclose personal information to other organisations unless:

- use or disclosure is permitted by this policy
- we believe it is necessary to provide you with a product or service which you have requested (or as an employee is necessary in maintaining your role at Venture)
- you give consent
- such disclosures are required by law, regulation, rule or professional standard. For example under the Chapter 2C of the Corporations Act, certain information about you as a security holder (including your name, address and details of securities you hold) must be included in the public register of the entity in which you hold securities and, this information will therefore be disclosed to anyone who requests to inspect it.

Venture uses service providers to help us maximise the quality and efficiency of our services and business operations, and personal information may sometimes be disclosed to those contractors or service providers. For example, personal information may be disclosed to IT service providers, off site security storage facilities, debt collection agencies, print or mail services. We require our service providers to adhere to our privacy guidelines and not to keep this information or use it for any unauthorised purposes.

We do not sell to or trade personal information with third parties.

### **What is a Government identifier?**

A Government identifier is a Commonwealth Government or Commonwealth Government agency designated identification number such as your Tax File Number (TFN).

Although at times Venture may request or hold details regarding certain Government assigned identification numbers we do not use such information as identifiers of our own.

We only use Government identifiers for purposes required by law such as when we supply your TFN to the Australian Taxation Office.

### **Does your personal information leave Australia?**

With one possible exception. Venture is unlikely to disclose your personal information to overseas recipients. The exception relates to on-line surveys. The service provider Venture use for on-line surveys is based overseas, and as a result your survey responses may be stored overseas. This is explained further in any survey you receive. It is impracticable for Venture to state precisely where the survey results are held as the service provider does not provide this information to Venture.

### **Sensitive information**

Some types of personal information is regarded as sensitive information if it concerns particular topics. Sensitive information can be information about your:

- racial or ethnic origin
- political opinions
- membership of a political association
- religious beliefs or affiliations
- philosophical beliefs
- membership of a professional or trade association
- membership of a trade union
- sexual preferences or practices
- criminal record
- health information

Venture only collects, uses or discloses this information about you as allowed by law.

## **Website**

This policy also applies to any personal information we collect via our websites, including [venturebendigo.com.au](http://venturebendigo.com.au). Venture may also collect personal information from you via its websites.

Cookies may be used on some areas of our websites. A cookie is a small software application which allows a website to recognise a previous user and to observe how a user navigates within a website. Cookies are now used as a standard by many websites. Venture uses cookies to improve the navigational experience of visitors to our websites and to make them easier to use.

If you are concerned about cookies, most browsers now recognise when a cookie is offered and permit you to opt out of receiving it. If you are not sure whether your browser has this capability, you should check with the software manufacturer or your internet service provider. In most cases, you can refuse a cookie and still fully navigate the Venture website.

In order to properly manage our websites, we may log certain statistics about the users of the sites, for example the users' domains and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our websites present the best possible navigational experience for visitors.

If you log onto the website and read or download information our Internet Service Provider/Hosting Provider, will record your server address, domain name, the date and time of your visit to our website, the pages viewed and the information downloaded. This information is used for measuring statistical site performance and website development purposes only.

When you scan a QR Code, the third party that we engage to provide our QR Codes may collect certain information from your mobile device (such as your mobile device identifier and IP address). This information is used only on our behalf for the purpose of providing anonymised statistical reports to us about users of our website and services.

You may wish to participate in social media platforms hosted by Venture which we make available to you. The main aim of these social media platforms is to facilitate and allow you to share content. However, Venture cannot be held responsible if you share personal information on social media platforms that is subsequently used, misused or otherwise appropriated by another user.

Venture may provide links to other social media platforms maintained on separate servers by individuals or organisations over which Venture has no control.

A link to a third party's website should not be construed as an endorsement by either Venture or that third party of the other or its products and services. Venture makes no representations or warranties regarding how user data is stored or used on third-party servers. We recommend reviewing the privacy policy of each third-party site linked from our site to determine their use of your personal data.

## **How we handle emails**

We will preserve the contents of any email message that you send us if we believe that we have a legal requirement to do so. Emails sent to or from us are routinely monitored for quality control, systems administration and legal compliance purposes.

## **Access and correction of your personal information**

Venture will take reasonable steps to keep any personal information up to date. Under the Privacy Act you can access information that we hold about you. There are some exceptions to this which are detailed in the Act.

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases we may also request an administrative fee to cover the cost of access. If your personal information has been archived we may charge a fee for retrieval of your file.

You also have the right to ask us to correct information about you which is inaccurate, incomplete or out of date. In most cases, access to your personal information is available to you at no charge by contacting Venture on the following:

**Phone:** 03 5434 7600

**Fax:** 03 5407 1402

**In writing:** The Managing Director, Venture Financial Planning Pty Ltd, PO Box 928, Bendigo, Victoria, 3552.

**Email:** [m.camm@venturebendigo.com.au](mailto:m.camm@venturebendigo.com.au)

If you are a security holder and your security holding is sponsored by a broker, you will need to contact your broker direct who will in turn arrange for the information to be collected.

All requests for access to personal information will be handled as quickly as possible and we will endeavour to process any request for access within 30 days of having received the request.

If you have any questions or comments about this privacy policy, or you wish to lodge a complaint about the way we have handled personal information about you, please contact Venture's Managing Director at the address listed above. Any complaint should be in writing. Venture will consider the complaint and endeavour to respond to it within 14 days. If you believe that Venture has breached the Australian Privacy Principles you may also wish to complain to the Office of the Australian Information Commissioner. The Commissioner's details are:

**Phone:** 1300 363 992

**Email:** enquiries@oaic.gov.au

**Fax:** 02 9284 9666

**Post:** GPO Box 5218 Sydney NSW 2001

We may change this policy from time to time to keep up with changes in the law, technology and practices.

This Privacy Policy was last updated in July 2017. All material copyright © 2017 Venture Financial Planning Pty Ltd.

## **PART B – DISCLAIMER**

This website and the articles on our website are not a substitute for independent professional advice. We do not warrant the accuracy, completeness or adequacy of the information or material on this website. All information is subject to change without notice. We and each party providing material displayed on this website disclaim liability to all persons or organisations in relation to any action(s) taken on the basis of currency or accuracy of the information or material, or any loss or damage suffered in connection with that information or material. You should make your own enquiries before entering into any transaction on the basis of the information or material on this website. Please ensure you contact us to discuss your particular circumstances and how the information provided applies to your situation.

### **Quality of information – always check the information**

Before relying on the information on this website, users should carefully evaluate its accuracy, currency, completeness and relevance for their purposes, and should obtain professional advice relevant to their particular circumstances. We and associated parties cannot guarantee nor assume any legal liability or responsibility for the accuracy, currency or completeness of the information or material.

### **Links to external websites**

This website may contain links to other websites which are external to our website. It is the responsibility of the user to make their own decisions about the accuracy, currency, reliability and correctness of information contained in linked external websites.

Linkage to external websites should not be taken to be an endorsement or a recommendation of any third party products or services offered by virtue of any information, material or content linked from or to this website. Users of links provided by this website are responsible for being aware of which organisation is represented or providing the information or material on the website they visit.

Views or recommendations provided in linked websites do not necessarily reflect our views or recommendations, nor the views or recommendations of associated parties.

**Security of our website?**

Users of our website should be aware that the World Wide Web is an insecure public network that gives rise to a potential risk that a user's transactions are being viewed, intercepted or modified by third parties or that files which the user downloads may contain computer viruses or other defects.

We and associated parties accept no liability for any interference with or damage to a user's computer system, software or data occurring in connection with this website. Users are encouraged to take appropriate and adequate precautions to ensure that whatever is selected from this website is free of viruses or other contamination that may interfere with or damage the user's computer system, software or data.

**Notification**

Notice of new or updated information or material available via our website may be emailed to our website members.