

INDEX TRACKING FINANCIAL ADVICE PTY LTD

Privacy Policy

1. Purpose

Index Tracking Financial Advice Pty Ltd ("Index Tracking", "we", "our" or "us") is committed to protecting the privacy and confidentiality of personal information.

This Privacy Policy explains how we collect, use, disclose, store and protect personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs).

This policy applies to all clients, prospective clients, authorised representatives, employees, contractors, suppliers and visitors to our website.

2. Who We Are

Index Tracking Financial Advice Pty Ltd

Australian Financial Services Licence Authorised Representative Network

Email:

info@indextrackingfa.com.au

Phone:

0411 722 854

Website:

www.indextrackingfa.com.au

3. What Personal Information We Collect

Depending on the services provided, we may collect personal information including:

Identification Information

- Full name
- Date of birth
- Residential address
- Postal address
- Email address
- Telephone numbers
- Driver licence
- Passport details
- Medicare details

- Tax File Number (where authorised)
- Citizenship and residency details

Financial Information

- Income
- Assets
- Liabilities
- Superannuation
- Investments
- Insurance policies
- Banking details
- Tax information
- Employment information

Sensitive Information

Where required to provide financial advice we may collect:

- Health information
- Medical history
- Insurance underwriting information
- Disability information

Sensitive information is only collected with your consent or where otherwise permitted by law.

Electronic Information

When using our website or electronic services we may collect:

- IP address
- Browser information
- Device information
- Cookies
- Website usage information

4. Why We Collect Personal Information

We collect personal information to:

- provide financial advice;
- identify clients;

- comply with legal obligations;
- establish and administer client accounts;
- prepare Statements of Advice;
- implement financial products;
- review financial strategies;
- communicate with clients;
- process transactions;
- manage complaints;
- conduct compliance monitoring;
- undertake internal audits;
- improve our services;
- prevent fraud;
- comply with regulatory obligations.

Without certain personal information we may be unable to provide our services.

5. How We Collect Information

Information may be collected:

- directly from you;
- during meetings;
- through online forms;
- by telephone;
- by email;
- through our website;
- from financial product providers;
- from accountants;
- from solicitors;
- from employers;
- from superannuation funds;
- from insurers;
- from credit reporting bodies (where authorised);
- from publicly available registers;

- from third parties authorised by you.

6. Cookies and Website Information

Our website may use cookies to:

- improve website functionality;
- remember preferences;
- analyse website traffic;
- enhance user experience.

You may disable cookies through your browser settings although some website functions may become unavailable.

7. How We Use Personal Information

We use personal information for purposes including:

- providing financial advice;
- implementing recommendations;
- conducting portfolio reviews;
- arranging investments;
- arranging insurance;
- providing ongoing advice;
- meeting regulatory obligations;
- managing our business;
- quality assurance;
- compliance reviews;
- internal training;
- risk management;
- responding to complaints;
- communicating important updates.

We only use personal information for purposes that are reasonably expected or authorised by law.

8. Disclosure of Personal Information

We may disclose personal information to:

- financial product issuers;
- platform providers;
- investment managers;
- custodians;
- insurers;
- superannuation trustees;
- accountants;
- solicitors;
- auditors;
- compliance consultants;
- information technology providers;
- cloud service providers;
- regulators;
- external dispute resolution schemes;
- government agencies;
- law enforcement agencies;
- our professional advisers;
- other parties authorised by you.

We do not sell personal information.

9. Overseas Disclosure

Some technology providers may store information outside Australia.

Where personal information is disclosed overseas, we take reasonable steps to ensure recipients comply with privacy obligations comparable to Australian privacy laws.

Countries may include, but are not limited to:

- Australia
- United States
- Singapore
- New Zealand
- United Kingdom

The countries used may change from time to time depending upon our technology providers.

10. Direct Marketing

We may occasionally send information about:

- financial services;
- newsletters;
- educational material;
- regulatory updates;
- business announcements.

You may opt out of marketing communications at any time by contacting us or using the unsubscribe facility.

11. Data Security

We take reasonable steps to protect personal information against:

- misuse;
- interference;
- loss;
- unauthorised access;
- modification;
- disclosure.

Security measures include:

- password protected systems;
- multi-factor authentication;
- encrypted communications where appropriate;
- secure cloud storage;
- firewall protection;
- anti-virus software;
- regular software updates;
- staff confidentiality obligations;
- access controls;
- secure disposal of records;
- regular backups;

- cybersecurity monitoring.

12. Retention of Information

We retain personal information for as long as required to:

- provide services;
- comply with legal obligations;
- satisfy ASIC record keeping requirements;
- manage disputes;
- meet taxation obligations.

When information is no longer required, it is securely destroyed or permanently de-identified.

13. Access to Personal Information

You may request access to your personal information.

Requests should be made in writing.

We will generally provide access unless an exception under the Privacy Act applies.

Reasonable identification may be required before releasing information.

14. Correction of Information

If you believe personal information held by us is inaccurate, incomplete or out of date, you may request correction.

We will take reasonable steps to correct information promptly.

15. Data Breaches

If an eligible data breach occurs, we will comply with the Notifiable Data Breaches Scheme under the Privacy Act.

This may include:

- investigating the incident;
- containing the breach;
- notifying affected individuals where required;
- notifying the Office of the Australian Information Commissioner (OAIC) where required;
- implementing corrective actions.

16. Government Identifiers

We do not use government identifiers as our own identifiers.

Government-issued identification documents are only collected where reasonably necessary and authorised by law.

17. Anonymity

Where lawful and practical, you may choose to deal with us anonymously or using a pseudonym.

However, due to anti-money laundering laws and financial services legislation, this will generally prevent us from providing financial advice or financial products.

18. Complaints

If you have a privacy complaint, please contact us.

Privacy Officer

Index Tracking Financial Advice Pty Ltd

Email:

[Insert Email]

Phone:

[Insert Phone]

Postal Address:

[Insert Address]

We aim to acknowledge complaints promptly and investigate them fairly.

If you are not satisfied with our response, you may contact:

Office of the Australian Information Commissioner (OAIC)

GPO Box 5218

Sydney NSW 2001

Telephone: 1300 363 992

Website: www.oaic.gov.au

19. Changes to this Policy

This Privacy Policy may be amended from time to time to reflect changes in legislation, technology or our business practices.

The latest version will always be available on our website.

20. Contact Us

Privacy Officer

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info@indextrackingfa.com.au

Phone:

0411 722 854

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