



morrows
PRIVATE WEALTH

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Morrows Private Wealth Privacy Policy

February 2021

Your financial future,
tailored your way



Morrows Private Wealth Pty Ltd
ABN 94 517 928 276
Australian Financial Services Licensee 244119
Life Insurance Broker





At Morrrows Private Wealth, we are committed to treating the personal information we collect in accordance with the Privacy Act 1988 (Privacy Act). This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of the privacy laws, access the personal information we hold about you and have that information corrected (where necessary).

If you would like more information about how we protect your privacy, please contact us. You can also obtain more information on privacy at the Office of the Australian Information Commissioner, www.oaic.gov.au.

What is personal information?

Under the Privacy Act 1988, personal information is defined as information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is recorded in a material form or not.

Under the Act some personal information is further classified as sensitive information. Sensitive information is personal information or an opinion about an individual's health, religion, racial or ethnic origin, political opinions, criminal record, sexual orientation and biometric information.

What personal information do we collect?

When you engage with us about our products or services we provide or the products and services we arrange with other providers (e.g. financial product issuers, insurers) and/or apply for any of these products or services, we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it and if you choose to supply it. If you apply for personal insurance, we may collect information about what is being insured, the beneficiaries and your health and financial situation, depending on the type of insurance.

Throughout the life of your product or service, we may collect and hold additional personal information about you. This could include transaction information or making a record of queries or complaints you make and, if you make an insurance claim, collecting additional information to assess the claim.

The collection of sensitive information is restricted by the Privacy Act. However, in some cases it may be necessary for us to collect sensitive information to provide you a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy or collect voice biometric information to verify your identity or authorise transactions.

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For what purposes do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to help us effectively provide financial products and services to you, marketing material and to satisfy certain legislative and regulatory requirements.

We will only disclose or use your personal information for the purposes for which it was disclosed to us, or related purposes which would reasonably be expected without your permission, or to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

How do we collect personal information?

We collect most personal information directly from you. We may also collect personal information about you from other third parties. Majority of the cases, collection of your personal information will be done with your consent through the completion of a Third-Party Authority, however from time to time we may collect information without your direct involvement.

We may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your accountant, legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- your employer;
- other organisations, who together with us, provide products or services to you;
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers and health care providers.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and [Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 \(No. 1\)](#);
- your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth); and
- certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).



How do we store your personal information?

Much of the information we hold about you will be stored electronically in secure data centers which are located in US, Europe or Asia and owned by external service providers. (Note that while this information may be stored overseas, it is not disclosed to these providers). Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure; all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

Who do we disclose your personal information to and why?

We may provide personal information about our clients to other entities within the Morrows Group and/or to organisations outside the Morrows Group. To protect personal information, we enter into contracts with our service providers that require them to comply with the Privacy Act. These contracts oblige them to only use the personal information we disclose to them for the specific role we ask them to perform.

Generally, we disclose personal information to organisations that help us with our business. These may include:

- our agents, contractors and external service providers (for example, mailing houses and technology service providers);
- paraplanning service providers;
- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments); other organisations, who jointly with us, provide products or services to you;
- financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;
- debt collectors;
- our legal advisers or auditors;
- your representatives (including your legal adviser, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct; IT Service Providers;



- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.
- we may also disclose your personal information to others outside the Morrrows Group where:
 - we are required or authorised by law or where we have a public duty to do so;
 - you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
 - we are otherwise permitted to disclose the information under the Privacy Act.

Do we disclose personal information overseas?

As mentioned above, while we may use external providers such as data warehousing providers who are located overseas, these entities store your information only. It is not disclosed to them.

In addition to this, it may be necessary from time to time to disclose your personal information to our overseas facilities, employees and contractors. Some of these entities may be located in, or have operations in, other countries. The countries and regions to which your personal information could be sent for administration, research and other financial services support is the Philippines.

If we disclose your information to a recipient outside of Australia we will, if the recipient is not regulated by laws that protect your information in a way that is similar to the Privacy Act, take reasonable steps to ensure that they protect information in the same way that we do or seek your consent before disclosing information to them. We have contracts with all the providers we use to this effect.

Further, any financial institution which you hold an account with overseas, we will only disclose your personal information where you have given us permission to make enquiries on your behalf.

Data Breaches

We must report certain data breaches to the Office of the Australian Information Commissioner (OAIC) and where required, the impacted individuals.





Do we use or disclose personal information for marketing?

We will use your personal information to offer you products and services we believe may interest you, but we will not do so if you tell us not to. We may offer you products and services by various methods, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through Morrows Group websites.

We may also disclose your personal information to companies outside the Morrows Group who assist us to market our products and services to you.

If you wish to unsubscribe to our information or registration service, please contact us by email or in writing requesting to be removed from our database.

Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits;
- Which pages are viewed;
- How users navigate through the site and interact with pages (including fields completed in forms and applications completed);
- Location information about users;
- Information about the device used to visit our website; and
- IP addresses

We use cookies and other technologies on our website. Cookies are small pieces of information stored on your hard drive or in memory. A cookie does not identify you personally but identifies your computer. Cookies record information about your visit to the site, allowing it to remember you the next time you visit to improve functionality.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent to another site or be retrieved by any non Morrows Group site.

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We will never ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

How can you check, update or change the information we are holding?

You can request access to the personal information we hold about you. You can also seek corrections to be made if you believe your personal information is inaccurate, incomplete or out of date. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections. In processing your request for access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

In all instances, we will need to establish your identity before providing and updating the information.

What happens if you want to complain?

We welcome your enquiries and comments about how we manage your privacy. If you have any concerns about whether we have complied with the Privacy Act, the Australian Privacy Principles or this Privacy Policy, please write to our Privacy Officer at:

Morrrows Private Wealth – Privacy Officer
Level 13 Freshwater Place
2 Southbank Boulevard
SOUTHBANK VIC 3006

We will acknowledge your complaint as soon as we can after receipt of your complaint and will let you know if we need any further information from you to resolve your complaint.

We will consider your complaint through our internal complaints resolution process and we will aim to resolve complaints within five business days, however some complaints may take longer to resolve and as such you will be notified when you can expect a further response.

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If your complaint is not resolved to your satisfaction, you may have the right to escalate the matter to an external dispute resolution scheme or regulatory authority such as The Australian Financial Complaints Authority (AFCA) who consider most privacy complaints involving providers of financial services. You can contact AFCA at:

GPO Box 3
MELBOURNE VIC 3001
Phone: 1800 931 678
Email: info@afca.org.au
Website: www.afca.org.au

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner (OAIC) about the way we handle your personal information. The OAIC can be contacted at:

GPO Box 5218
SYDNEY NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au

Your Consent

By engaging us to provide our advice and service offering as detailed in our latest Financial Services Guide (FSG), you consent to the collection and use of the information you have provided to us for the purposes described above.

Changes to the Privacy Policy

This Privacy Policy was last updated on 1 November 2018. We may continue to update this policy from time to time. The new version will be available on our website at www.morrrows.com.au or by calling us on (03) 9690 5700.

Contact Details

Address: Level 13 Freshwater Place, 2 Southbank Boulevard, SOUTHBANK VIC 3006
Email: mpw@morrrows.com.au
Telephone: (03) 9690 5700
Fax: (03) 9690 6509

Meaning of words

We, us or our means: Morrrows Private Wealth is the holder of an Australian Financial Services License (AFSL) No 244119, ABN 94 517 928 276. Morrrows Group means us and any related entities.

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