

# Our Privacy Policy

Version 2 – 28 February 2018

Atlantic Pacific Securities Pty Limited trading as ASR Wealth Advisers (ABN: 72 135 187 085) (**ASR Wealth Advisers**) is a Corporate Authorised Representative of Amalgamated Australian Investment Solutions Pty Limited (ABN: 61 123 680 106. AFSL: 314 614) (**AAIS**). ASR Wealth Advisers and AAIS are part of the Amalgamated Australian Investment Group Limited (ABN: 81 140 208 288).

## What does privacy mean for me?

Privacy is important to Us and to Our Clients. The privacy laws ensure that you understand:

- We maintain a record of your personal information:
- How we use your information: and
- To whom we may disclose your information.

In addition, it reinforces our commitment to keeping your information up to date and secure.

## What types of personal information about me does ASR Wealth Advisers and AAIS hold?

We collect and hold information about you that is both relevant and necessary in order for us to provide you with financial advice and services to meet our legal obligations. The information we hold depends on the services provided and may include information about your identity, banking details (for settlement purposes), current investments and investment preferences. Please note that ASR Wealth Advisers is only authorised to provide general advice with respect to your investment activity.

In relation to general advice services your personal needs, circumstances, goals and financial situation are not taken into account. For this reason, you should always consider whether the advice is appropriate and should you wish to receive personal advice, please seek advice from a professional authorised to provide personal advice.

We will always endeavour to obtain your information directly from you.

## How does ASR Wealth Advisers and AAIS use my personal information?

Our primary purpose in collecting your personal information is to meet our legal obligations, complete trading account documentation to assist you set up the most relevant trading facility and understand your current investments.

At any time, we may need to appoint another financial adviser, within the Licensee, to manage your financial needs and services. You will be notified of any change to your financial adviser. Your new adviser will be provided access to your information.

We may also use your information to bring to your attention other services or products that may be of interest to you.

We may use or disclose personal information about you for the purpose of direct marketing if: we collected the information from you, you would reasonably expect us to use your information for this purpose, you have consented to the use of your information for that purpose, we provide you with the option to "opt out" or "unsubscribe", or you have not previously requested to be "opted out" or "unsubscribed".



## How does ASR Wealth Advisers and AAIS collect and hold my personal information?

We collect information about you will usually be collected over the telephone, on-line or during face-to-face interviews.

We take reasonable steps to protect your information from misuse, interference and loss, and from unauthorised access, modification or disclosure. We do this by securely storing information not-accessible by un-authorized individuals. If we hold your personal information and we no longer need this for any purpose for which the information may be used or disclosed by us under this policy, and the information is not contained in a Commonwealth record, and we are not required by or under an Australian law, or a court/tribunal order to retain the information, then we must take reasonable steps to destroy the information, or to ensure the information is de-identified.

If you would like to "Opt Out" of receiving updates about our products and services please email [admin@asrw.com.au](mailto:admin@asrw.com.au) address with the subject "Unsubscribe" and include the following information:

Name of company you received the communication from:  
Full Name:  
Email address:

If you are "Opting Out" for multiple individuals, please include these details (as listed above) also.

## Who does ASR Wealth Advisers and AAIS disclose my personal information to?

Your information is only disclosed to other parties as are necessary for us to provide and services to you. Other parties may include internally owned companies and subsidiaries of the Amalgamated Australian Investment Group Ltd including other Licensees, related parties, accountants, trading platform providers, storage, emailing services and other service providers as appropriate.

In addition, we will disclose your information where we are required to by law.

We will not pass your information to other parties for any purposes other than those for which you have been informed.

## How do I get access to the personal information ASR Wealth Advisers and AAIS holds about me?

You may request access to the information we hold about you by contacting your authorised representative or ASR Wealth Adviser (or AAIS) directly. Upon receipt of your request we will endeavour to service your request as fully and as quickly as possible.

In some circumstances access to your information or parts thereof may not be possible. If this is the case we will inform you as to why and, where practicable, make alternative arrangements. Depending on the requirements a fee may be charged to service requests.

## What should you do if you have a complaint?

If you have any complaints about the collection and / or use of your personal information please call Compliance on 02 9048 6835 or put your query or complaint in writing and send it to:

Complaints and Compliance  
ASR Wealth Advisers  
Level 13, 333 George Street  
SYDNEY NSW 2000

ASR Wealth Advisers will try to resolve your complaint quickly and fairly. If your complaint has not been resolved satisfactorily, you may escalate your complaint to the Privacy Commissioner on 1300 363 992. The Australian Securities and Investments Commission (ASIC) may be contacted on 1300 300 630 to find out which body may be best to assist you in settling your complaint.