



**Actocue Pty Ltd**  
**ABN 32 128 604 419**  
**Privacy Statement**

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**Respecting your privacy and the law**

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The privacy of your personal information has always been important to us at the Actocue Group **(the 'Group')**. We are committed to respecting your right to privacy and protecting your personal information. We adhere to the Australian Privacy Principles and any applicable laws and codes affecting your personal information. Our staff are trained to respect your privacy in accordance with the law and our standards, policies and procedures.

We may also need to share your information with third parties, such as financial product providers. Also it is a Actocue policy to use the information within the Group's companies to identify and make available to you other broadly related financial services. This enables Actocue to have an integrated view of you, our client.

You have the right to request us in writing that your personal information not be provided to other parties, however, that may mean that it is not possible to provide you with the products and services that you have requested. Where this is the case we will inform you in writing.

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**About this Privacy Policy**

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This Privacy Policy outlines how we manage your personal information, including the purposes for which your personal information is held and how that information is collected, used and disclosed.

Our Privacy Policy applies to all your dealings with us whether at one of our branches, through our offices, via our websites or an adviser. However, depending on the Group Company with which you deal, further privacy information may apply in addition to the matters discussed in this Privacy Policy.

We encourage you to check our websites regularly for any updates to our Privacy Policy.

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**Members of the Group and a brief description of the services they provide, include:**

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- Modoras Pty Ltd ABN 86 068 034 908, Australian Financial Service License and Australian Credit Licence Number 233209 (Licensee)
- Navacue Accountants Pty Ltd ABN 37 460 720 728 (accounting services)
- Navacue Financial Advisors Pty Ltd ABN 27 236 614 176 (financial advising services)
- Enevida Pty Ltd ABN 40 128 973 464, Australian Financial Service Licence Number 321254 (Licensee),
- CPA Partners Pty Ltd ACN 066 776 396 (accounting services)
- CPA Partners Finance Pty Ltd ACN 096 146 593 (credit assistance)
- CPA Wealth Management Pty Ltd ABN 80 158 443 479 (financial advising services)
- RJS Wealth Management Pty Ltd ABN 24 156 207 126 (financial advising services)
- RJS Sanderson & Associates Pty Ltd ABN 71 060 299 783 (accounting services)
- FinancialLine Pty Ltd ABN 28 104 193 857 (technology services).
- FinancialLine Finance Pty Ltd ABN 11 644 724 780, Australian Credit Licence Number 392126 (credit services)

## **Collecting your personal information**

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The Group collects and holds your personal information for the purposes of:

- Providing you with the relevant service (including assessing your application and identifying you);
- Managing and administering the service we provide to you and
- Protecting against fraud where it is a banking, finance, or insurance product or service.

Group companies may also collect your personal information for the purpose of promoting and marketing products or services that might be of interest to you;

We collect your personal information when you fill out product or service documentation, an administrative form, or when you give us personal information over the telephone, or through a Group organisation's website.

We may collect your personal information from third parties such as your employer, or a representative such as a legal adviser or accountant or publicly available sources of information.

## **The type of personal information we collect and hold**

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Personal information held by the Group may include identification information such as your name, address, phone numbers, email addresses, tax file number etc. Depending on the type of service or product you require or choose, we may also ask you for other personal information including:

- Employment information;
- Marital status, and family information or circumstances;
- Financial information such as your superannuation and other investment details;
- Business interests and trust structures;
- Your insurance, credit, financial and bankruptcy history;
- Date of birth, Gender, Past times, hobbies, family history;
- Details regarding any circumstances or assets you wish to insure; and
- Other personal information details which are needed depending on the type of financial product or service you require.

## **Your sensitive information**

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The collection of sensitive information is restricted by the Privacy Act. This includes information such as your racial or ethnic origin, political opinions, association memberships and details of health, disability etc.

This type of information is only collected with your consent and where required to provide you with the products, services or assistance you may require and the collection of this information is needed to provide these.

## **How will we collect your personal information**

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We collect your personal information:

- Directly from you when you provide information by phone, in person or in documents;
- From third parties including related firms as listed as Members of the Group;
- From publicly available sources of information;
- When required to do so by Federal or State legislation;
- The organisations identified within this document;

## **Security of your information**

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We hold your personal information in:

- Our computer systems and electronic databases;
- Digital records and
- In hard copy or paper files.
- Stand by systems and system backups to deal with any business interruptions;
- Limiting physical access to our offices and premises;
- Limiting physical and electronic access to your personal information and our systems;
- Requiring all third party providers to have acceptable security measures and privacy practices / policy in place which meet ours and the Australian Privacy Act requirements;
- Maintaining technical security product to protect your personal data and
- Destroying or de identifying personal data and information pursuant to the law once such data is no longer required to be maintained by us.
- Staff training and through employment agreements and electronic user identifiers and passwords.

In addition, Actocue maintains industry standards in relation to its technology and procedures with respects to management of information and its online services.

## **Using and disclosing your personal information**

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In order for the Group to meet your specific needs it may need to disclose your personal information to the type of firms and organisations described below. Where your personal information is disclosed we will seek to ensure that the information is held, used or disclosed consistently with the Australian Privacy Principles and any State Legislation and other applicable privacy laws and codes.

The relevant organisations are those:

- Involved in providing, managing or administering your product or service including
  - Banking and finance organisations;
  - Financial Planning service providers
  - Trustee or custodial services
  - Life or General insurance providers
- Group organisations who may wish to promote and market products or services that might be of interest to you;
- Who are external advisers and their service providers;
- Involved in maintaining, reviewing and developing our business systems, procedures and infrastructure;
- Involved in a transfer of all or part of the assets or business of a Group organisation;
- Involved in the payments system including financial institutions, merchants and payment organisations;
- Involved in a service or product planning and development;
- Which are your representatives including your legal advisers and accountants;
- As required or authorised by law;
- Where you have given your consent.

## **Other use and disclosure**

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If your personal information is subject to Australian Privacy Principles, we only will use and disclose your personal information for a secondary purpose if it is related to the primary purpose for which we collected it and where you would reasonably expect us to use or disclose your information for that secondary purpose. In the case of sensitive information, we will only use this information for the secondary purposes if it is directly related to the purpose of collection or where we are required or authorised by law to disclose your personal information and sensitive information. For example, to a Court in response to a subpoena or to the Australian Taxation Office, Centrelink or to the Australian Transaction Reports and Analysis Centre (AUSTRAC).

## **Use and disclosure of personal information for marketing**

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The Group is able to assist you in providing a large range of financial services, products and advice. An important part of our service to you is marketing, by being able to keep you up to date with new products and services which we think may be of benefit and interest to you.

In bringing this information to you, we use a large range of communication tools including mail, telephone, email and other internet based tools as well as direct and group presentations. Third party marketing service providers may combine the personal information we disclosed to them with information they already hold about you, to provide you with more relevant advertising about the products and services we can provide you.

## **Keeping your personal information accurate and up-to-date**

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We aim to ensure that the personal information we collect, use or disclose is accurate, complete and up-to-date. We will take reasonable steps to make sure this is the case. This way we can provide you with better service. If you believe your personal information is not accurate, complete or up to date, please contact us.

## **Protecting your personal information**

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We store information in different ways including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, loss unauthorised access, modification or disclosure.

## **Your privacy on the Internet**

### **Our Websites**

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We take care to ensure that the personal information you give us on our websites is protected.

For example, our websites have electronic security systems in place, including the use of firewalls and data encryption. Depending on the Group Company with which you deal, user identifiers, passwords or other access codes may also be used to control access to your personal information.

Please refer to the website of those Group companies with which you transact electronically for more information on our website specific privacy and security procedures.

### **Links to other sites**

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You may be able to access external websites by clicking on links we have provided. Those other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

### **Overseas Service Providers and disclosure**

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Companies within our Group will, when necessary, disclose personal information to organisations and persons overseas. Instances when we will do this include:

- When we are authorised or required by an Australian law or a court/tribunal to do so;
- When we have engaged an overseas service provider to deliver services central to our financial service business operations.

Your personal information will only be disclosed to the extent it is necessary to perform our functions or activities.

These external service providers to whom your data may be provided are for our Group's client service management system and the service providers for this are located in Indonesia. This external overseas service provider provides computer system, computer code support and service to the group. Also, our internal document management system is supported by a service provider located both within Australia and overseas in the Philippines.

### **Cookies**

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When you visit our website details may be recorded about your visit, such as time and date, your server address, pages accessed, time spent and type of browser. This information is used in an anonymous form for statistical purposes and as such cannot identify you individually.

When you log into the client section of our site we may use cookies to identify who you are while you are logged in for the session. The cookie is unique to that session and the data within the cookie is encrypted. You must have cookies enabled to be able to use our site.

## **Gaining access to your personal information**

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You can gain access to the underlying personal information and data the Group holds in relation to you. You can also ask for corrections to be made. If you would like to request access to your personal information we hold about you please contact us.

There are some circumstances where we are not required to give you access to your personal information. If we refuse your request we will give you reasons if we deny access.

Our response to your request could take up to 30 days from the receipt of your request. If we require further time we will write to you and advise you of the reason for the further time required. If such request incurs a fee, we will advise you of this.

## **Correction of personal information**

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You also have the right to request that we correct any inaccurate, out of date, incomplete, irrelevant or misleading personal information we may hold. We will take such steps that are reasonable to make any correction required. If we refuse to change or correct your personal information we will provide reasons for the refusal in writing to you. If we refuse to correct or change any personal information, you have a right to associate with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take any steps that are reasonable to associate that statement with all the records containing that relevant information.

## **Using Government identifiers**

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In certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number. We do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## **Dealing with us anonymously or through the use of pseudonyms**

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You have the option of not identifying yourself and dealing with us anonymously or through the use of a pseudonym, where it is lawful and practicable to do so.

## Resolving your privacy issues

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If you have any issues or a complaint that you wish to raise with the Group about the way in which we collect, use, hold or disclose your personal information or about a privacy related issue please use our complaint process so that we can help.

- You are always welcome to speak directly to our staff and they will do their best to resolve your issue. Alternatively, you can email your issue to [info@actocue.com](mailto:info@actocue.com), write to us directly or contact us by phone. If investigation is required we will keep you advised of progress.
- If our staff are unable to resolve the matter it will be escalated to an appropriate Senior Manager of the Group.
- If we are unable to resolve your issue or complaint immediately a response will usually be provided to you within 5 business days. At Actocue we aim to resolve all client complaints the same day where possible. Where this cannot be accomplished we will endeavour to resolve the client complaint within 45 days. However, this may not always be practicable.
- If Actocue is unable to resolve the complaint we will advise you in writing.
- If you are not satisfied with the outcome you may be able to access the services of an external dispute resolution scheme, we have provided contact details of these below:

<b>Office of the Australian Information Commissioner (OAIC)</b>  Complaints must be in writing  Phone 1300 363 992  Director of Compliance Office of the Australian Information Commissioner GPO Box 5218 Sydney NSW 2001  <a href="http://www.oaic.gov.au">www.oaic.gov.au</a>	<b>Credit and Investment Ombudsman Service</b>  The Credit and Investment Ombudsman Service is an external dispute services available to individuals whose complaints comes under their terms of references. A Credit and Investment Ombudsman officer will be able to advise if they can be of assistance.  Phone 1800 138 422 Credit and Investment Ombudsman Service PO Box A252, Sydney South NSW 1235  Facsimile (02) 9273 8445  <a href="http://www.cio.org.au">www.cio.org.au</a>
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## Contacting us

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If you seek any further information from the Actocue Group about this policy, please contact our Privacy Officer at the reference point below:

Email: [info@actocue.com](mailto:info@actocue.com)

Registered Address: Level 3, 50 – 56 Sanders Street  
Upper Mt Gravatt QLD 4122

Postal Address: PO Box 6530  
Upper Mt Gravatt QLD 4122

Telephone: (07) 3219 2066

Facsimile: (07) 3219 4432