



# PRIVACY STATEMENT

VERSION 2

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# PRIVACY STATEMENT

## 1. Introduction

At Freeman Fox Ltd (“Freeman Fox”, “the company”, “us”, “we”, “our”) we are committed to safeguarding your privacy by ensuring personal information about you and other individuals is protected in a way that observes our own corporate values, as well as complying with the requirements of the National Privacy Principles of the Privacy Act 1988 (the “Act”).

The Privacy Statement (“Statement”) sets out the minimum procedures for safeguarding your privacy.

## 2. Scope of statement

This statement applies to Freeman Fox, subsidiary companies, and its agents. The objective of the Privacy Act is to set a standard for protecting the privacy of all individuals. The National Privacy Principles and the requirements of them are explained in detail below.

### 2.1 Privacy and the Company’s corporate relationships

Freeman Fox is the holder of an Australian Financial Services licence (“AFSL”) (AFSLN 246510), and a participant of the Australian Stock Exchange (“ASX”) and Newcastle Stock Exchange (“NSX”).

Freeman Fox is a member of the Freeman Fox Group (the “Group”) and may refer tasks to other related companies, including but not limited to:

- Freeman Fox Administration Services Pty Ltd (ACN 095 224 472),
- Freeman Fox Finance Pty Ltd (ACN 095 224 481),
- Freeman Fox Property Pty Ltd (ACN 095 359 292),
- Freeman Fox Franchising Pty Ltd (ACN 095 696 576), and
- Jornada Pty Ltd (ACN 118 258 692).

Agents of Freeman Fox are self-employed Freeman Fox Franchisees, who are appointed as Authorised Representatives of Freeman Fox to provide financial services on our behalf.

## 3. Definitions

### 3.1 Personal Information

Your personal information includes details such as name, address, date of birth, and contact details, e.g. phone and fax numbers, email addresses etc.

### 3.2 Sensitive Information

Sensitive information is a subset of personal information and by its "sensitive" nature may have the potential to be used to discriminate against someone. Examples of sensitive information

include but are not limited to personal information or opinions on your health, criminal records, etc. Sensitive information can only be recorded if it is relevant to do so and with your consent.

## **4. Freeman Fox Privacy Principles**

### **4.1 Collection of Personal Information (National Privacy Principle 1)**

Where you have requested a product or service, Freeman Fox collects your personal information where it is necessary primarily to identify you or your business entity and to assess and establish the suitability of the product or service requested.

### **4.2 Your Rights and the Disclosure of Personal Information**

You need not give personal information about yourself that may be requested by us to supply Freeman Fox products and services. However, without that information, Freeman Fox may not be able to provide you with the products or services you have requested.

### **4.3 Use of Information (National Privacy Principle 2)**

Freeman Fox collects your personal information to ensure that we are able to provide you with the products and services most appropriate to your needs. Freeman Fox may use your personal information for related purposes, such as a credit agency reference, in accordance with the National Privacy Principles. Your personal information may also be used to complete internal business functions such as auditing, management reporting, research, product development and planning.

### **4.4 Disclosure of Information (National Privacy Principle 2)**

In providing products and services Freeman Fox may disclose your personal information to organisations that carry out functions on behalf of Freeman Fox. This may include but not be limited to sales agents, mailing houses (for the purposes of issuing invitations to attend seminars and other correspondence relating to new opportunities with us), and other services providers we may use or recommend in the provision of secondary services. This includes external auditors, computer and information technology service providers for computer, internet, and related functions.

Although Freeman Fox undertakes its best endeavours to ensure your personal information is safeguarded in a manner consistent with its privacy statement and only used to carry out functions on its behalf we cannot accept liability for any misuse of your personal information by those organisations or individuals.

### **4.5 Marketing**

In accordance with the National Privacy Principles, Freeman Fox may also use and disclose your personal information with Jornada Pty Ltd (a related body) to send marketing material about other products and services that may be of interest to you.

Freeman Fox may disclose your personal information to other companies within the Group to offer you other products and services, including but not limited to Freeman Fox Administration Services Pty Ltd, Freeman Fox Finance Pty Ltd, and Freeman Fox Property Pty Ltd, to send marketing material about other products and services that may be of interest to you.

If you do not wish to receive information about these products and services please tell us by calling our Customer Service Centre on 1800 003 369. This does not preclude you from being provided with information specific to your existing Wealth Club membership.

#### **4.6 Data Quality (National Privacy Principle 3)**

Freeman Fox must ensure your personal information collected, used or disclosed is, at all times, accurate, complete and up to date.

You should advise us immediately when you become aware that any information we hold about you is incorrect or out of date. Freeman Fox undertakes to amend its records as soon as practical after it is advised subject to the validity of the request being confirmed.

#### **4.7 Data Security (National Privacy Principle 4)**

Freeman Fox will take all reasonable steps to protect the personal information it holds from misuse and loss and from unauthorised access modification and disclosure. Your information may be stored in paper or electronic format.

Security measures implemented with respect to Freeman Fox's IT systems will take account of internal and external recommendations, general industry practice and technological development in the provision of IT security services.

Freeman Fox's IT security measures include state of the art firewall technology, encryption of usernames and passwords over the Internet and phone services and provision of unique user identification and password codes to your account(s).

When using our Internet services we may use "cookies" to ascertain product preferences and tailor future visits to the site to suit them. Most web browsers can be configured to not accept cookies, however the site functionality may be restricted as a result. Other than statistical information we do not collect information about you through our website other than where you provide it.

#### **4.8 Openness to Freeman Fox Practices (National Privacy Principle 5)**

Information in this statement gives you some insight into how we manage your personal information and your rights. For further information on the information handling practices of Freeman Fox contact the Customer Service Centre on 1800 003 369 and ask to speak with the Compliance Manager.

#### **4.9 Access (National Privacy Principle 6)**

You are entitled to access personal information we may hold about you. The type of information that you may request is your personal information as well as any comments, opinions and file notes that Freeman Fox holds about you.

Freeman Fox will process your request within a reasonable time, generally 5 business days for a straight forward request. However additional time may be needed depending on the nature of the request.

Freeman Fox is not required to provide you with access to your information in some cases i.e. where the law allows Freeman Fox to deny access. If Freeman Fox denies you access to your information you will be advised the reason why.

A request to access your personal information must be directed to the Freeman Fox Compliance Manager by: Telephone 1800 003 369 Fax 1800 679 796 Post PO Box 7830 Brisbane Qld 4001 Email [wealth@freemanfox.com.au](mailto:wealth@freemanfox.com.au)

#### **4.10 Identifiers (National Privacy Principle 7)**

Identifiers are unique numbers that a Commonwealth Government agency has assigned to you. These include tax file numbers.

Collection of tax file numbers (“TFN”) is authorised and its use and disclosure are strictly regulated by Tax and Privacy Laws. Quotation is not compulsory, however there may be tax implications for individuals who choose not to quote their TFN or claim an exemption. Freeman Fox will use and disclose this information only for tax related purposes.

Freeman Fox maintains the necessary security to ensure that TFN information is protected, by such safeguards as are reasonable in the circumstances, to prevent loss, unauthorised access, use, modification or disclosure, and any other misuse.

Freeman Fox will remove and destroy all records of a TFN as instructed, and immediately upon an individual ceasing to be a member of the Wealth Club.

#### **4.11 Anonymity (National Privacy Principle 8)**

In complying with the National Privacy Principles Freeman Fox will allow its customers to interact anonymously wherever it is lawful and practical to do so.

#### **4.12 Trans Border (overseas) Data Flows (National Privacy Principle 9)**

Should you request a transaction or service where your personal information may be transferred to another country, your information may be transferred to a country that does not have the same privacy laws as Australia.

This may occur in instances where you request an international telegraphic transfer where your name and account details may be divulged.

#### **4.13 Sensitive Information (National Privacy Principle 10)**

If it is necessary to record sensitive information (such as health related information), we must obtain your specific consent to collect that information. Sensitive information is generally not required for most Freeman Fox products and services. You are entitled to access any information that we record.

#### **4.14 Information required for Statutory Compliance Purposes**

In addition to questions that Freeman Fox may ask to ensure general statutory compliance there may be special circumstances where the company or its agents are required to seek additional information about you

#### 4.15 Further Information or Questions

It is the Compliance Manager responsibility to manage, investigate, coordinate, and respond to your inquiries, disputes lodged, information access and correction requests in accordance with Freeman Fox's procedures and the National Privacy Principles.

The Compliance Manager will also provide you with contact details for the Privacy Commissioner if required where the company is unable to resolve a dispute to your satisfaction.

The Compliance Manager can be contacted between 8am and 6pm Monday to Friday (excluding national public holidays) by:

Telephone 1800 003 369  
Post PO Box 7830 Brisbane Qld 4001  
Email [wealth@freemanfox.com.au](mailto:wealth@freemanfox.com.au)  
Facsimile 1800 679 796



# PRIVACY DECLARATION & CONSENT

## Privacy of Your Personal Information

At Freeman Fox we are committed to safeguarding your privacy by ensuring personal information about you and other individuals is protected in a way that observes our own corporate values, as well as complying with the requirements of the National Privacy Principles of the Privacy Act 1988.

## Collection, Use and Disclosure of Your Personal Information

Where you have requested a product or service, Freeman Fox collects your personal information where it is necessary primarily to identify you or your business entity, to assess and establish the suitability of the product or service requested, and to facilitate payment for the provision of the product or service.

By providing your personal information to us you acknowledge and consent that:

1. We can collect and use your personal information for the following purposes:
  - a. To assess your current financial situation, needs and objectives; and
  - b. To assess the suitability of other products and services we may provide via companies in the Freeman Fox Group ("the Group").
2. We can collect your personal information from and disclose it on a confidential basis to the following: companies in the Group, other service providers, government departments, and law enforcement agencies; and
3. You represent to us that where you provide personal information to us about another person, you are authorised to provide that information to us, and that you will inform that person who we are, how we use and disclose their information, and that they can gain access to that information.

## Marketing Purposes

We may disclose your personal information on a confidential basis to companies in the Group so that they can also offer you products and services.

By providing your personal information to us you acknowledge and consent that:

1. We are collecting and using your personal information to contact you to provide information about products and services offered by the Group; and
2. You will inform us if you do not want your personal information to be used or disclosed to companies in the Group for these marketing purposes.

## Our Privacy Statement

Further information on how we handle your personal information is explained in our Privacy Statement including: how to contact us regarding Privacy, how to inform us to change your marketing consent; and how to access personal information we may hold about you. A copy of our Privacy Statement is available at our office or from our website [www.freemanfox.com.au](http://www.freemanfox.com.au).

## Declaration and Consent

I/We agree that Freeman Fox may collect and use my/our personal information as specified above.

**Full Name** \_\_\_\_\_ **Full Name** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Signature** \_\_\_\_\_

**Date** \_\_\_ / \_\_\_ / \_\_\_ **Date** \_\_\_ / \_\_\_ / \_\_\_

I/We do not wish to receive marketing material as mentioned above.

# PRIVACY DECLARATION & CONSENT

## Privacy of Your Personal Information

At Jornada Pty Ltd (“Jornada”, “the company”, “us”, “we”, “our”) we are committed to safeguarding your privacy by ensuring personal information about you and other individuals is protected in a way that observes our own corporate values, as well as complying with the requirements of the National Privacy Principles of the Privacy Act 1988.

## Collection, Use and Disclosure of Your Personal Information

Jornada is a member company of the Freeman Fox Group (“the Group”). Where you have requested a product or service, Jornada collects your personal information where it is necessary primarily to identify you or your business entity, to assess and establish the suitability of the product or service requested, and to facilitate payment for the provision of the product or service.

By providing your personal information to us you acknowledge and consent that:

1. We can collect and use your personal information for the following purposes:
  - a. To assess your current financial situation, needs and objectives; and
  - b. To assess the suitability of other products and services we may provide via companies in the Group.
2. We can collect your personal information from and disclose it on a confidential basis to the following: companies in the Group, other service providers, government departments, and law enforcement agencies; and
3. You represent to us that where you provide personal information to us about another person, you are authorised to provide that information to us, and that you will inform that person who we are, how we use and disclose their information, and that they can gain access to that information.

## Marketing Purposes

We may disclose your personal information on a confidential basis to companies in the Group so that they can also offer you products and services.

By providing your personal information to us you acknowledge and consent that:

1. We are collecting and using your personal information to contact you to provide information about products and services offered by the Group; and
2. You will inform us if you do not want your personal information to be used or disclosed to companies in the Group for these marketing purposes.

## Our Privacy Statement

Further information on how we handle your personal information is explained in the Group’s Privacy Statement including: how to contact us regarding Privacy, how to inform us to change your marketing consent; and how to access personal information we may hold about you. A copy of our Privacy Statement is available at our office or from our website [www.jornada.com.au](http://www.jornada.com.au)

## Declaration and Consent

I/We agree that Jornada may collect and use my/our personal information as specified above.

**Full Name** \_\_\_\_\_ **Full Name** \_\_\_\_\_

**Signature** \_\_\_\_\_ **Signature** \_\_\_\_\_

**Date** \_\_\_ / \_\_\_ / \_\_\_ **Date** \_\_\_ / \_\_\_ / \_\_\_

I/We do not wish to receive marketing material as mentioned above.