

# **Privacy Policy**

Shepherd Financial Services Pty Ltd is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <https://www.oaic.gov.au/>.

**Shepherd Financial Services Pty Ltd ABN 75 894 828 131**

## **What is Personal Information and why do we collect it?**

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect includes names, date of birth, addresses, account details, email addresses, phone, facsimile numbers, and occupation, including any other information we made need to identify you. The personal information we hold may also include opinion on you and personal credit information.

This Personal Information is obtained in many ways including, interviews, correspondence, by telephone and facsimile, by email, via our website [www.premierfinancegroup.com.au](http://www.premierfinancegroup.com.au), from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect personal information for the purposes of assessing your application for finance and managing that finance.

When we collect Personal Information, we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

## **Direct Marketing**

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

We may also collect your personal information for the purposes of direct marketing and managing our relationship with you. From time to time, we may offer you current updates on other products and services you may find of interest, changes to our organisation, or new products and services being offered by us or any company with whom we are associated.

We may us third party businesses to assist us in managing your account. You may unsubscribe from our mailing/marketing lists at any time, by contacting us in writing or contacting us on the numbers below. We will take all reasonable steps to meet your request at the earliest possible opportunity.

**Simon Shepherd      0409 252 377**

## **Sensitive Information**

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record, or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

## **Third Parties**

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party. Third parties include finance/insurance brokers and other people such as accountants and lawyers.

## **Disclosure of Personal Information**

To enable us to maintain a successful business relationship with you. We may disclose your personal information to other organisations that may have or is considering having an interest in your finance or in our business.

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law, such as under the Anti-Money or Laundering and Counter Terrorism Financing Act 2006 (Cth);
- To prospective funders or other intermediaries in relation to your finance requirements.
- To other organisations that are involved in managing or administering your finance such as third-party suppliers, printing and postal services, call centres;
- To associated business that may want to market products to you.
- To companies that provide information and infrastructure systems to us.
- To anybody who represents you, such as finance/insurance brokers, accountants and lawyers.
- To anyone, where you have provided us consent.
- To your employer, referees or identity verification services.

Prior to disclosing any of your personal information to another person or organisation, we will take all reasonable steps to satisfy ourselves that Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification, or disclosure.

1. The person or organisation has a commitment to protecting your personal information at least equal to our commitment, or
2. You have consented to us making the disclosure.

We may use cloud storage to store the personal information we hold about you. The cloud storage and the IT servers may be located outside of Australia.

## **Security of Personal Information**

We will take reasonable steps to protect your personal information by storing it in a secure environment. We may store your personal information in paper and electronic form.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

## **Access to your Personal Information**

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Shepherd Financial Services Pty Ltd will not charge any fee for your access request but may charge an administrative fee for providing a copy of your Personal Information.

Depending on the type of request that you make we may respond to your request immediately, otherwise we usually respond to you within seven days of receiving your request. We may need to contact other entities to properly investigate your request.

In order to protect your Personal Information, we may require identification from you before releasing the requested information.

There may be situations where we are not required to provide you with access to your personal information, for example, if the information relates to existing or anticipated legal proceedings, or if your request is vexatious. An explanation will be provided to you if we deny you access to the personal information, we hold about you.

### **Using government identifiers.**

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier to identify you.

## **Maintaining the Quality of your Personal Information**

It is important to us that your Personal Information is accurate and up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up to date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

If you wish to make any changes to your personal information, you may contact us. We will generally rely on you to ensure the information we hold about you is accurate or complete.

## **Complaints**

If you are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act you may contact our complaints officer on

Simon Shepherd      0409 252 377

## **Policy Updates**

This Policy may change from time to time and is available on our website.

## **Privacy Policy Complaints and Enquiries**

If you have any queries or are dissatisfied with how we have dealt with your personal information, or you have a complaint about our compliance with the Privacy Act you may contact our complaints officer on;

### **Business Address**

**143 Burke Road, Glen Iris, VIC 3146**

### **Email**

**simon@premierfinancegroup.com.au**

### **Phone**

**Simon Shepherd 0409 252 377**