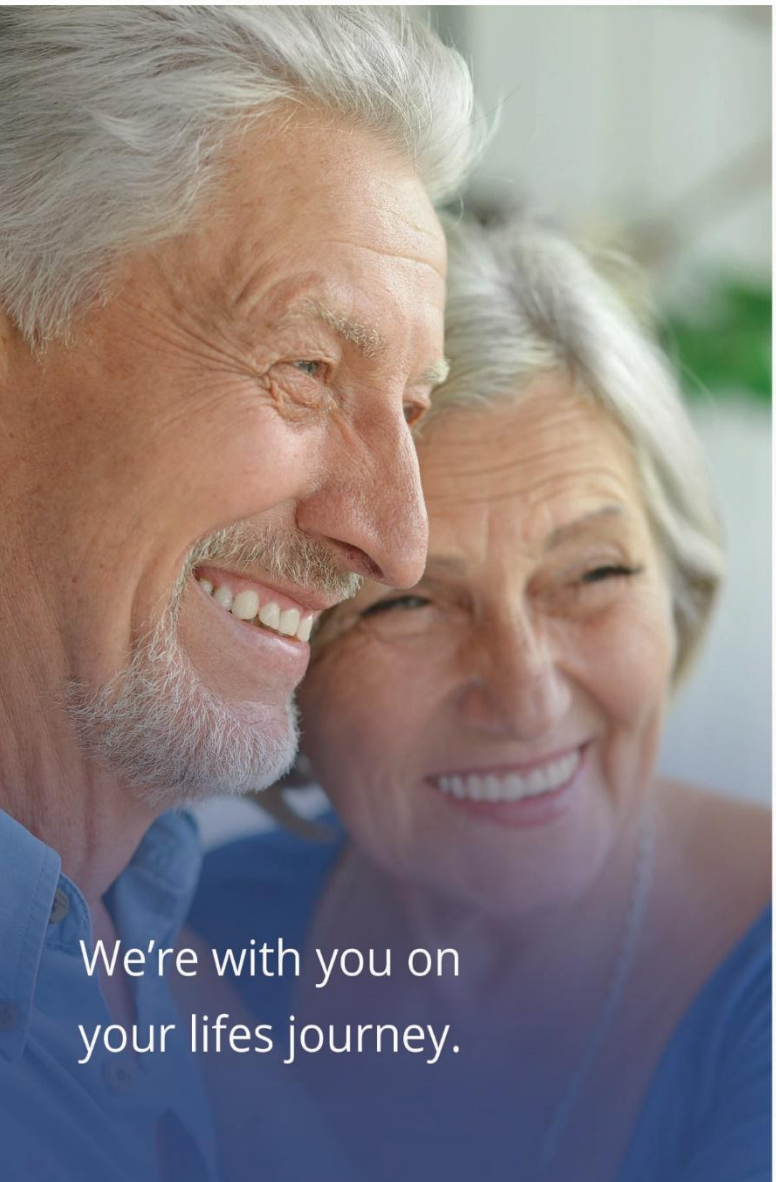
NFP GROUP PTY LTD

Privacy Policy











About this Policy

This Privacy Policy applies to NFP Group Pty Ltd, its directors, authorised representatives, and associated entities (referred to as "we," "our," or "us"). We are bound by the Privacy Act 1988 (Cth) and adhere to the Australian Privacy Principles (APPs). This policy outlines how we collect, hold, use, disclose, and protect your personal information.
We respect the confidentiality and privacy of the personal information you provide to us. This document sets out how we manage that information in line with our obligations.
Updated 9 November 2026

Why We Collect and Use Personal Information

We collect personal information for purposes that include:

- Providing you with financial products, services, and advice
- Implementing risk management or investment strategies on your behalf
- Complying with legal obligations (e.g. identity verification, record keeping)
- Internal operations such as record keeping, audits, training, and data analytics
- Handling inquiries and complaints
- Marketing other services or products that may be relevant to you

If you do not wish to receive direct marketing communications, please contact us using the details at the end of this policy.

What Personal Information We Collect

Personal information may include (but is not limited to):

- Name, date of birth, contact details
- Tax file number, Medicare number, or other government identifiers
- Employment and financial details, including investment preferences and risk tolerance
- Residency and citizenship status
- Health and medical information (for insurance or relevant advice)
- Family commitments and social security status

We may also collect information about your family members where relevant to the services provided. Sensitive information (e.g. health data) will only be collected if required and with your consent.

How We Collect Information

We collect personal and sensitive information in various ways:

- Directly from you (e.g. forms, meetings, phone, email, our websites)
- Through digital tools such as online calculators or interactive tools
- From third parties acting on your behalf (e.g. lawyers, accountants, financial advisers)
- From product issuers (e.g. super funds, insurers) once authorised
- Publicly available sources or social media

You may choose not to provide information. However, this may affect the quality of advice and services we can provide or result in our declining to act.
If unsolicited personal information is received, we will assess whether it could have been collected. If not, we will destroy or de-identify it.

Use and Disclosure of Information

We use your personal information for:

- Delivering financial advice and services
- Implementing your financial plans
- Identifying relevant services or products
- Business operations and IT maintenance

We may disclose your information to:

- Your authorised representatives or advisers
- Product providers (e.g. investment platforms, insurers)
- Service providers (e.g. IT vendors, paraplanners, marketing, audit and compliance)
- Government and regulatory authorities
- Professional organisations, solicitors, courts, or tribunals
- Any person acquiring or considering acquiring part of our business

Your government identifiers (e.g. TFN, Medicare number) will only be disclosed where legally required or authorised.

Overseas Disclosure of Information

We use Australian and overseas providers for financial planning software, cloud hosting, AI, meeting transcription and administrative support. Depending on the provider and service, personal information may be stored, processed or accessed in India, the United States, the Philippines, Singapore, Israel, the United Kingdom, New Zealand, Canada and South Africa. Our providers may also process information in European Union countries; some publish only the region rather than individual countries. Storage in Australia does not necessarily mean all processing or support access occurs in Australia. We take reasonable steps to ensure overseas recipients handle personal information consistently with the APPs. Contact our Privacy Officer for further information about the overseas recipients relevant to our services.

If you do not consent to overseas disclosures, we may be unable to provide services to you.

Use of AI and Automated Decision Making

We use financial planning software and may use artificial intelligence (AI) and other automated tools to assist with analysing client information, checking compliance, preparing documents and recording or summarising client meetings. This includes software supplied by third-party providers.

Personal information used in these tools may include your name and contact details, age, employment, income, expenses, assets, liabilities, superannuation and insurance details, financial goals, investment preferences, risk tolerance and relevant information from client meetings. Where relevant to insurance or other advice, this may include health and medical information collected with your consent.

Use of AI and Automated Decision Making- continued from previous page

These tools may assist us to assess your financial position and risk profile, prepare projections, compare financial strategies and products, and develop recommendations about investments, superannuation, retirement income or insurance. Their outputs may materially inform decisions about the advice and services we recommend to you.

We do not make decisions that significantly affect your rights or interests solely through automated tools. An adviser reviews the relevant information and outputs and exercises professional judgement before advice or recommendations are provided to you. Human review does not prevent a tool from materially contributing to a decision.

Where a tool is used only to record or format a decision already made by an adviser, its role is administrative. Where it analyses your information or generates assessments or recommendations that materially guide our advice, its role includes assisting decision making. You can contact our Privacy Officer for further information about how we use your personal information in these processes.

Storage and Protection of Personal Information

We store your personal information securely in electronic databases and hard copy files. Measures to protect your information include:

- Secure passwords and encryption
- Multi-Factor Authentication (MFA)
- Staff training and cyber awareness
- Confidentiality agreements with third parties
- Firewalls, antivirus tools, intrusion detection systems
- Cybersecurity and breach response plans

We retain personal information for at least 7 years post-service to meet regulatory requirements. Where personal information is no longer required, we take steps to de-identify or securely destroy it.

Website & Digital Interactions

Our website may collect personal data via:

- Cookies: used to monitor website usage and improve user experience
- Log files and web beacons: track IP addresses, device type, pages visited, and country location

Cookies can be managed via your browser settings.

Accessing and Correcting Information

You may request access to your personal information at any time. We aim to respond within 30 days. We do not charge for making an access request. Where permitted by law, we may charge a reasonable, non-excessive fee for providing access and will advise you of the proposed fee in advance.
If you believe any information we hold is incorrect, incomplete, or outdated, you may request a correction. There is no charge for requesting or making a correction. If we decline, we will provide written reasons and inform you of your right to complain.

Notifiable Data Breaches

We will notify you and the OAIC if a data breach is likely to cause serious harm. A statement will be issued with recommended steps to protect yourself.

Complaints

If you believe we have breached privacy laws or mishandled your information:

- Submit a complaint in writing to our Privacy Officer (details below)
- We will acknowledge your complaint within 1 business day and aim to resolve it within 30 days
- You may also escalate to:
    - **Office of the Australian Information Commissioner (OAIC)**: www.oaic.gov.au / 1300 363 992
    - **Australian Financial Complaints Authority (AFCA)**: www.afca.org.au / 1800 931 678

Policy updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website (www.nfp.com.au) or by contacting us.

Contact Details

Privacy Officer: Jim Zagoudis
Postal Address: PO Box 32, Oakleigh VIC 3166
Telephone: 03 9504 3878
E-mail: jimz@nfp.com.au