



We're with you on
your life's journey.

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.

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 may disclose information to service providers operating in countries such as India, United States, , and the Philippines. Reasonable steps are taken to ensure overseas recipients comply with privacy obligations equivalent to the APPs. Your adviser may disclose information to additional jurisdictions and will notify you separately if applicable.

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

Use of AI and Automated Tools

Where appropriate, we may use automated tools or AI systems to assist in data analysis, compliance checking, or document generation. These systems are used solely under human supervision and do not make final decisions without review.

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. A reasonable fee may be charged, disclosed in advance.

If you believe any information we hold is incorrect, incomplete, or outdated, you may request 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