



Privacy Policy

SmartPlanner Group Pty Limited

1. Introduction

SmartPlanner Group Pty Ltd (ABN 38 169 967 140) and its subsidiaries, SmartPlanner Asset Management Pty Ltd (ABN 74 168 647 854) and SmartPlanner Solutions Pty Ltd (ABN 14 169 970 272) ("we", "us", "our"), are committed to protecting your privacy in accordance with the Australian Privacy Principles (APPs) set out in the Privacy Act 1988 (Cth).

This Privacy Policy outlines how we collect, use, disclose, and protect personal information. The policy relates to the Prospera Financial Freedom System, is a financial modelling tool used by Australian Financial Services Licensees (AFSL), their financial planning firms and advisers, who input and store their client data in the system.

2. Collection of Personal Information

The Prospera Financial Freedom System stores the following types of personal information:

- **Personal Details:** Name, Date of Birth, Gender
- **Financial Information:** Income, expenses, assets, liabilities, and other relevant financial data
- **Bank Account Details:** Bank account details required for track to plan and client billing modules.

Any information collected is required by the financial modelling, track to plan and client billing modules of the system.

3. How We Collect Personal Information

AFSLs and their financial planning firms are responsible for entering data into the Prospera Financial Freedom System. The data entered and stored in the system is owned by the AFSL and the responsible financial planning firm, ensuring that the AFSL and responsible financial planning firm retain control over their clients' information.

Each AFSL and their financial planning firms remain responsible for maintaining the data and making available a Privacy Policy of its own that complies with the Australian Privacy Principles. AFSLs and their financial planning firms must ensure the information collected is accurate, complete, and up-to-date.

4. Use of Personal Information

Data entered by AFSLs and their financial planning firms is used to generate financial models, track to plan reports and manage client billing. Personal information will only be used for the purposes for which it was collected, or for related purposes that would be reasonably expected by the individual.

5. Disclosure of Personal Information

We will not use or disclose customer data of AFSLs and their financial planning firms to any third party without the AFSLs or responsible financial planning firms written instruction or a lawful government access request.

In addition, we will only use personal information for the purposes of providing the online services and will not mine data for advertising or any other secondary purpose. We will take reasonable steps to ensure that any third-party service providers comply with the Australian Privacy Principles.

6. Data Security

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. This includes implementing physical, electronic, and managerial security measures such as encryption and regular security audits.

Personal Information is stored in on servers hosted by Microsoft Azure in the Australia East region. We do not have any hard copy files. We do not engage contractors or organisations located outside Australia to carry out work on our software.

In the event of a data breach, we will promptly notify the affected AFSLs and financial planning firms with details regarding the data impacted, ensuring they are informed and can take appropriate action to protect their clients' information.

7. Access and Correction of Personal Information

Each AFSL and their financial planning firms are responsible for maintaining their client data and making available a Privacy Policy of their own that complies with the Australian Privacy Principles. SmartPlanner will ensure that the Prospera Financial Freedom System supports the maintenance requirements of each AFSL and their financial planning firms.

Individuals can request access to or correction of their personal information by contacting their financial planner. Financial planners are responsible for responding to such requests in a timely manner and ensuring the accuracy and completeness of the information.

8. Complaints

If you believe that we have breached the Australian Privacy Principles, you may contact us to lodge a complaint. We will investigate your complaint and respond within a reasonable timeframe. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC).

Internal complaint handling process:

- Lodge a complaint by contacting us via the details provided below.
- We will acknowledge receipt of your complaint within five business days.
- We will investigate and respond to your complaint within 30 days.
- If you are not satisfied with our response, you may contact the OAIC.

9. Contact Us

If you have any questions about this Privacy Policy, please contact us at:

Prospera (SmartPlanner Group)

Email: David.Dye@prospera.com.au

Phone: 0418 746 653

Address: P.O. Box 6787 Norwest NSW 2153

10. Changes to This Privacy Policy

We may update this Privacy Policy from time to time. The latest version will be available on our website. Significant changes will be communicated to users directly, where appropriate.

11. Anonymity and Pseudonymity

AFSLs and their financial planning firms can enter data into the Prospera Financial Freedom System in a way that allows their clients to remain anonymous or use a pseudonym, where it is practical and lawful to do so. This option helps protect the privacy of clients who prefer not to disclose their full identity.