SUSTAIN CAPITAL

*Preserving Prosperity*

# Privacy Policy

Last Updated 10th March 2023

# Privacy Policy

At Australian Financial Freedom Pty Ltd T/A Sustain Capital, we are committed to protecting your privacy. This Policy describes our policies and practices for collecting, handling, storing, using and disclosing personal information. It also deals with how you can complain about a breach of your privacy, access the personal information we hold about you and have that information corrected (where necessary).

**What personal information do we collect and hold?**

When we provide you with any strategic wealth advice or investment management services, we ask you for the information we need in order to establish your personal profile with us as well as to establish any accounts on your behalf with third parties such as banks and share brokers.

We also maintain records of any communications you have with our office and any recommendations we may make to you. We may collect your information when we have face to face appointments with you, when we speak to you via telephone, via email or in client application forms and/or website enquiry forms.This can include a broad range of information from your name, address, contact details and age to information about your personal affairs including details or your needs, objectives and financial situation.

We will only collect your information from third parties, e.g. your bank, previous adviser or accountant if you provide us with prior verbal or written authority for us to do so.

**How do we use your information?**

We collect, hold use and disclose your personal information so we can provide you with financial services relevant to your needs and objectives. We may also collect, use and disclose your information for related purposes such as:

•Send you regular investment updates and/or newsletters*
•Complying with our legal obligations;
•Assisting with your questions and complaints;
•Arranging for services to be provided by third parties;
•Internal operations, such as record keeping, data analytics, auditing or training; and
•Promotion of other products and services that may be of interest to you*

* We will always give you the option of electing not to receive these communications and you can unsubscribe at any time by notifying us that you wish to do so.

**What if you don’t provide information to us?**

Where we provide personal financial advice to retail clients, we will give advice that is suitable to your needs and circumstances. To do so we need to find out your needs, objectives and financial situation before we can recommend any financial products or services to you. You have the right not to divulge this information to us if you do not wish to do so. In that case, we are required to warn you about the possible consequences of us not having your full personal information.

If you do not provide us with some or all the information that we ask for, we may not be able to provide services to you or apply for products on your behalf.

**How do we store and protect your personal information?**

We keep your personal information in your client files or electronically on servers located in Australia. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements. Personal information is treated as confidential information and sensitive information is treated as highly confidential. It is a legislative requirement that we keep all personal information and records for a period of at least 7 years.

**Will we disclose your personal information to anyone?**

We do not sell, trade, or rent your personal information to others. We will disclose your information to any banks, brokers and share registries as required for the purposes of establishing and maintaining these accounts and running the services we provide to you.

In some circumstances, we may opt to use contractors to dispose of paper copy materials that may include your personal information, e.g. document destruction facilities. We will take all reasonable steps to ensure that they protect your information in the same way that we do.

We may provide your information to others if we are required to do so by law or under some other unusual circumstances but only in instances that the law permits.

We will not disclose your information to overseas recipients.

**How can you check, update or change the information we are holding?**

You may ask us for access to your personal information and to correct it at any time.
Upon receipt of enough information to allow us to identify the information, we may tell you what personal information we hold about you. We may also correct, amend or delete your personal information if we agree is inaccurate, irrelevant, out of date or incomplete.

We do not charge for receiving a request for access to personal information for complying with a correction request.

To access or correct your personal information, please write to Sustain Capital, PO Box 6048, Wollongong DC NSW 2500 or via email to admin@sustaincapital.com.au

In some limited situations, we may need to refuse access to your information or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

**What happens if you want to complain?**
We welcome your questions and comments about how we manage your privacy. If you have any concerns about how we manage your privacy or would like to make a complaint, please write to our COO at Sustain Capital, PO Box 6048, Wollongong DC NSW 2500 or via email to admin@sustaincapital.com.au.

We will consider a complaint through our internal complaints resolution process and we will try to respond with a decision within 30 days of you making the complaint.

**Your consent**
By asking us to assist with your financial planning and investment needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

**Updating this policy**
This Privacy Policy was prepared on 13/03/2023. We may update it at any time. The new version will be published on our website.