

## **Ellerfield Wealth Pty Ltd - Privacy Policy**

Ellerfield Wealth Pty Ltd (Ellerfield) recognises the importance of your privacy, and that you have a right to control how your personal information is collected and used. We know that providing personal information is an act of trust and we take that seriously. Unless you directly give us consent to do otherwise, Ellerfield will only collect and use your personal information as set out below.

Ellerfield abides by the Australian Privacy Principles, which provide a scheme in relation to the collection, disclosure, use and storage of personal information.

Ellerfield ensures to the extent possible that its agents and service providers are aware of its and their respective obligations under the Privacy Act.

### **Collection of Personal Information**

Personal information is information or opinion from which an individual's identity may be ascertained. Ellerfield collects personal information from its clients as part of the account opening process and enquiry forms.

The nature of personal information collected by Ellerfield generally comprises an individual's personal and financial information, including address, phone, fax, e-mail, income statement, financial goals and objectives and risk profile. Such personal information is collected for the purposes of providing financial services and products to you. Failure to provide personal information may expose you to high risks in respect of the recommendations provided and may affect the adequacy or appropriateness of the advice we give you.

If you choose to not provide your personal information when requested, we may not be able to provide the financial services that you have requested.

In some cases, where it makes sense and is lawful, you can interact with us anonymously or by using a pseudonym (an alias). This will generally be permitted when you are viewing our website and prior to registering your interest to open an account.

We usually collect personal information directly from you although sometimes we may use agents or service providers to do this for us. We may also acquire lists from other sources, both from other companies and from other public documents.

We do not collect personal information unless it is necessary for us to have this information when providing financial services and products to you. On occasion, some of this personal information may be sensitive and we will only collect it with your consent or when required to by law.

**Sunshine Coast | Brisbane | Mount Isa | Nort Sydney | Darwin**

#### **Head Office**

T1 404 Kon-Tiki Business Centre  
55 Plaza Parade  
Maroochydore Qld 4558

PO Box 1760  
Maroochydore Qld 4558

E: [info@ellerfield.com.au](mailto:info@ellerfield.com.au)  
P: 1300 876 693

Ellerfield Wealth Pty Ltd ABN 64 641 999 233 is an Authorised Representative of Walker Capital Private Wealth Pty Limited ABN 86 161 363 097 an Australian Financial Services Licensee with its registered office at Level 57, 19-29 Martin Place, Sydney NSW 2000.

The management of Ellerfield is committed to ensuring that all personal information collected from its clients is afforded an appropriate level of privacy in accordance with the Privacy Act and the Australian Privacy Principles, by which Ellerfield is bound.

### **Collection of Sensitive Information**

We will not use any personal identifiers issued by a government agency (eg. Tax file number or Medicare number) as an identifier in our records or systems. Should legislation require us to ask you to provide your tax file number, we will only use that number for the purposes permitted by legislation and not as a general means of identifying you.

### **Unsolicited Personal Information**

Unsolicited personal information is personal information about an individual that has been unintentionally received. This is an uncommon occurrence for Ellerfield, but when it does happen, we will protect your personal information with the same rigour as we treat personal information that we intended to collect. If we could not have collected this information through our normal processes, we will de-identify that information as soon as we can.

### **Use and Disclosure of Personal Information**

We will only use or disclose Personal Information collected by us for the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or where you have consented to such disclosure. The disclosure of sensitive information collected by Ellerfield is prohibited under all circumstances.

We may disclose your information to our service providers and contractors from time to time to help us provide and market our financial services and products to you. If we do this we generally require these parties to protect your information in the same way we do.

In some cases we may need to disclose your personal information outside Australia. If we believe that the overseas third party is not subject to privacy obligations equivalent to those which apply to us we will seek your consent to disclose the information, except where the Australian Privacy Principles do not require us to do so.

We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by either a relevant regulator (eg. Australian Securities and Investments Commission).

We will not use or disclose your personal information for any other purposes without first obtaining your express or implied consent. We may however be required to disclose your personal information without your consent if the disclosure is:

- required or authorised by law;
- we believe it is necessary to provide you with a service which you have requested;
- required in order to investigate an unlawful activity;
- required by an enforcement body for investigative activities; or
- the assets and operations of the business are transferred to another party as a going concern.

## **Security of Personal Information**

We strive to ensure the security, integrity and privacy of personal information we hold in relation to our clients. We use a variety of physical and electronic security measures including restricting physical access to our offices and firewalls and secure databases to keep personal information secure from misuse, loss or unauthorised use or disclosure. Some of these steps include:

- Physical access controls to our premises;
- Paper files are stored in lockable cabinets;
- Computer and network security including password and other electronic protection;
- Our employees are obliged to respect the confidentiality of personal information we hold; and
- Training of staff on information handling processes.

We only retain information that is necessary and relevant to our operations. We retain most information relating to you for at least seven years in order to meet legal and business requirements. Once information is no longer required, we arrange for it to be destroyed in a secure manner.

## **Access to personal information**

You have a right to access most personal information we hold about you and if we deny access in some circumstances we will tell you why. A reasonable charge may apply to gain access to the information. You will be advised of any charges that may apply when you make a written request.

To request access, please contact either your advisor or our privacy officer as set out at the end of this document. You may be required to provide suitable identification to enable us to protect the security and privacy of your personal information.

## **Changing or deleting your Personal Information**

We endeavour to ensure that information we hold about you is accurate, complete and up-to-date whenever we collect, use or disclose it. If you establish that information we hold about you is not accurate, complete or up to date, then we will take reasonable steps to correct the information. It is however important that you advise us immediately of any changes to your personal and financial information.

## **Cookies**

Cookies are pieces of information that a website transfers to your computer's hard disk for record keeping purposes. Most web browsers are set to accept cookies. Cookies in and of themselves do not personally identify users, although they do identify a user's browser. Cookies are useful to determine overall traffic patterns through our website.

If you do not wish to receive any cookies you may set your browser to refuse cookies. This may mean you will not be able to take full advantage of our website.

## **Direct Marketing**

We may use your personal details to provide you with information about financial services and products which may be of interest to you.

If we send you any information about financial services or products, or you do not want us to disclose your personal information to any other organisation in this context (including related bodies corporate) you can opt out by contacting your advisor or our Privacy Officer.

### **Online Links to Third Party and Co-Branded Sites**

We may provide links to websites outside of our service. These linked sites are not under our control Ellerfield, and we are not responsible for the conduct of companies linked to our website. Before disclosing your personal information on any other website, we advise you to examine the Terms and Conditions of those websites.

### **Future changes**

We review our Privacy Policy periodically and reserve the right to change it at any time. We will notify you of any changes by posting an updated version of the policy on our website.

### **For further information**

Please contact our Privacy Officer to ask for access to your information or if you have a complaint concerning your information privacy or if you would like more information about our approach to privacy.

Telephone: (02) 8076 2210

Email: [admin@walkercapital.com.au](mailto:admin@walkercapital.com.au)

Address: Level 57, MLC Centre 19 – 29 Martin Place Sydney NSW 2000

You can obtain further general information about your privacy rights and Commonwealth privacy law from the Office of the Australian Information Commissioner by:

Telephone: 1300 363 992

Email: [foi@oaic.gov.au](mailto:foi@oaic.gov.au)

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Address: GPO Box 5288 Sydney NSW 2001