

# Kilara Group - Privacy Policy

**Version: 1.0**

**Date Published:** September 2013

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# 1 Our Commitment to Privacy

Kilara Group recognises that it is important for our clients to know how we deal with personal information and for that reason this statement outlines our current Privacy Policy.

Kilara Group abides by the National Privacy Principles (NPPs) established under the Privacy Amendment (Private Sector) Act 2001. Our privacy Policy sets out our commitment to those principles.

We require each of our representatives to adopt our Privacy Policy.

## 2 Collection of Information

As Kilara Group comprises both accounting and financial planning services, we are required under various legislative bodies and codes of practice to collect certain information in order to provide the range of services noted above.

These include, but are not limited to, the Corporations Act, Superannuation Guarantee Act, Income Tax Assessment Act, certain regulations issued by the Australian Securities and Investments Commission, as well as the Rules of Professional Conduct of the Financial Planning Association and those of CPA Australia.

In addition, our ability to provide clients with comprehensive and quality services is reliant on us obtaining certain personal information.

The representatives and staff of Kilara Group may request personal and sensitive information from clients, which will generally comprise, but not be limited to, the following type of information:

- Personal details e.g. name, address, contact details (phone, facsimile, email), date of birth, marital status, dependants, employment details
- Financial details e.g. assets, liabilities, income, expenses
- Details of all investments, amounts, investor numbers and bank account details
- Personal goals, objectives and risk profile
- Insurance policy details e.g. life, trauma, income protection and general insurance
- Estate planning details including status of wills, executors, beneficiaries and powers of attorney
- Taxation information e.g. tax file number
- Centrelink details e.g. benefit type and reference number
- Health information e.g. current health condition, smoker status and medical history
- Sexual orientation and history, for insurance application purposes
- Professional/Trade Memberships, political beliefs and ethnic origins

Failure to provide us with the information required may result in Kilara Group electing to terminate our relationship, as it may jeopardise our ability to provide a complete, accurate and comprehensive service.

We will not collect any personal information except when clients have knowingly provided that information to us or authorised a third party to provide that information to us.

Information will be collected from a variety of sources including directly from clients, external organisations and associated companies of Kilara Group.

We only collect, maintain and use Personal & Sensitive Information if it is necessary for us to adequately provide the services requested.

### 3 Use and Disclosure of Information

Kilara Group will only collect, maintain and use personal information about clients for the following purposes:

- Provision of accounting and financial planning services
- Completion of associated documentation and application forms
- To provide agreed services to assist in meeting your requirements, goals and objectives
- To market services that may be supplied by Kilara Group or by other suppliers, which may be of interest to clients, unless informed not to do so.

The organisations to whom we may be required to disclose information include, but are not limited to:

- Associated companies and internal divisions of Kilara Group
- Financial institutions (including fund managers, life companies, share brokers) with which clients will be investing, are invested in or have previously invested in
- Government departments e.g. Australian Taxation Office and Centrelink
- External service providers and other compliance inspectors for audit purposes
- Any other external party as authorised by clients from time to time

Furthermore, we will not use or disclose information collected other than for a purpose made known to clients unless the disclosure is:

- Required by law (e.g. the Australian Tax Office, Australian Prudential Regulation Authority and the Australian Securities and Investments Commission have the power to order us to disclose information about clients' situations);
- Is authorised by law (e.g. to protect our interests or where we have a duty to the public to disclose) or;
- Clients have consented to our disclosing the information.

Kilara Group undertakes not to sell, rent or trade personal information.

We may use the personal information collected for the purpose of providing clients with direct marketing material such as articles of interest. However, a request can be made not to receive such information by contacting the Privacy Officer at Kilara Group

## **4 Storage and Security**

Kilara Group recognises how important the privacy of personal information is to clients. At all times, we will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

Personal information is generally held in client files. Information may also be held in a computer database. All paper files are stored in secure areas. Computer-based information is protected through the use of access passwords.

In the event a person ceases to be a client of this organisation, any personal information we hold will be maintained in a secure area or secure off-site storage facility for a period of at least 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

## **5 Identifiers**

Kilara Group will not assume as our own any identifiers that may be provided to us such as Tax File Numbers, Centrelink reference numbers, Medicare numbers etc.

## **6 Transfer of Information Overseas**

Kilara Group allows the provision to send personal information overseas. This is either when information is sent directly to the client, or to obtain further information from international organisations to aid services provided. Wherever possible, the information will only be transferred to another country where Kilara Group reasonably believes the other country has privacy laws substantially similar to our own.

## **7 Access to your Information**

A client may at any time, request access to their personal information which we will comply with by way of copies of the information requested, allowing clients to inspect the information requested or providing an accurate summary of the information held.

We may, prior to providing access in accordance with this policy, require clients to provide evidence of their identity.

In the event we refuse access to personal information, we will provide an explanation for that refusal.

We will endeavour to respond to any request for access within 10 business days depending on the complexity of the information and/or the request and may charge fees for the request of a significant amount of information to be copied or accessed.

## **8 Quality of the Personal Information**

Kilara Group is committed to ensuring that personal information held is accurate, complete and up to date. To assist us with this, we request that clients please contact us if there is any change in the details provided.

Furthermore, if clients believe that the information we have on file is not accurate, complete or up to date, we request that they contact us and we will take all reasonable steps to correct the information.

## **9 Privacy Complaints**

If clients wish to make a complaint about any breach or potential breach of this privacy policy or the National Privacy Principles, they should contact us, and we request that the complaint be directed to the Group's Privacy Officer as below.

Privacy Officer  
Kilara Group  
PO Box 115  
COROWA NSW 2646  
(02) 6033 1133

It is our intention to use our best endeavours to resolve any complaint to the satisfaction of the client. However, if a client is unhappy with our response, they are entitled to contact the Office of the Privacy Commissioner who may investigate the complaint further.

## **10 On-line Policy**

Kilara Group's website may contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the National Privacy Principles.

We will not collect any information from our website except where visitors knowingly provide it to us. The information collected will depend on how the facilities are used on the website and may include some of the personal details stated above. For example, if a person visits the website to browse or download information, our system will record the date and time of the activities, the information viewed and/or downloaded. In the event that a person enters information in the process of completing an email or any other on-line forms, Kilara Group will collect the information if the details are submitted.

Our website uses cookies, which allow us to identify the browsers used by visitors to our site. Cookies do not identify individuals. They simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers have a facility to notify users when they receive a cookie and elect to either accept it or not. Each Internet Service Provider should be able to assist users with their preferences.

## **11 Changes to this Privacy Policy**

Kilara Group reserves the right to review and amend this Privacy Policy from time to time and will ensure that the updated Privacy Policy is made available.

## **12 Additional Privacy Information**

Further information on Privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>