



Primary Wealth Management

**PRIVACY STATEMENT
VERSION 1.1**

19 FEBRUARY 2026

GUIDANCEADVISERS

This Privacy Statement is issued by Guidance Advisers Pty Ltd (ABN 65 653 468 832, AFSL 540341) ('Guidance Advisers') and is authorised for distribution by its Corporate Authorised Representatives.

Guidance Advisers is committed to protecting your privacy. We require all our employees, directors, and Authorised Representatives to strictly adhere to the *Privacy Act 1988* (Cth) and the Australian Privacy Principles. This Privacy Statement explains how we collect, hold, use, and protect your personal information.

TABLE OF CONTENTS

<i>PART A (INTRODUCTION)</i>	3
1. INTRODUCTION	3
<i>PART B (COLLECTION OF PERSONAL INFORMATION)</i>	4
2. WHY WE COLLECT INFORMATION	4
3. INFORMATION WE MAY COLLECT	4
4. HOW WE COLLECT INFORMATION	5
5. INFORMATION COLLECTED FROM SOMEONE ELSE	5
6. INCOMPLETE OR INACCURATE INFORMATION	5
7. CONSENT	5
8. WITHDRAWING CONSENT	5
9. SENSITIVE INFORMATION	5
10. DEALING WITH UNSOLICITED PERSONAL INFORMATION	6
<i>PART C (INTEGRITY OF YOUR PERSONAL INFORMATION)</i>	6
11. QUALITY OF PERSONAL INFORMATION	6
12. SECURITY OF PERSONAL INFORMATION	6
<i>PART D (USE OR DISCLOSURE OF PERSONAL INFORMATION)</i>	7
13. USE OR DISCLOSURE	7
14. WHO WE MAY COMMUNICATE WITH	7
15. OVERSEAS DISCLOSURE OF PERSONAL INFORMATION	8
16. COMMITMENT TO THE NOTIFIABLE DATA BREACHES (NDB) SCHEME	8
17. OUTSOURCING	8
18. DISCLOSURE REQUIRED BY LAW	9
<i>PART E (DIRECT MARKETING)</i>	9
19. DIRECT MARKETING	9
<i>PART F (ADOPTION, USE OR DISCLOSURE OF GOVERNMENT IDENTIFIERS)</i>	9
20. ADOPTION OF GOVERNMENT RELATED IDENTIFIERS	9
21. USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS	10
<i>PART G (ACCESS TO PERSONAL INFORMATION)</i>	10
22. ACCESS	10
23. EXCEPTIONS	10
24. REFUSAL TO GIVE ACCESS AND OTHER MEANS OF ACCESS	10
<i>PART H (CORRECTION OF PERSONAL INFORMATION)</i>	11
25. CORRECTION	11
26. REFUSAL TO CORRECT INFORMATION	11
27. REQUEST TO ASSOCIATE A STATEMENT	11
<i>PART I (CONTACT US AND COMPLAINTS)</i>	11
28. CONTACT	11
29. MAKING A PRIVACY COMPLAINT	12

PART A (INTRODUCTION)

1. INTRODUCTION

- 1.1 The information in this document details how we, Guidance Advisers, comply with the requirements of the *Privacy Act 1988* (Cth) ("Privacy Act") and the Australian Privacy Principles in protecting the personal information we hold about you.
- 1.2 Personal information is any information or opinion about you that is capable, or reasonably capable, of identifying you, whether the information or opinion is true or not and is recorded in material form or not.
- 1.3 Sensitive information includes such things as your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record, that is also personal information. Your health, genetic and biometric information and biometric templates are also sensitive information.
- 1.4 We protect your personal and sensitive information in accordance with the Australian Privacy Principles and the Privacy Act.
- 1.5 We collect personal and/or sensitive information to provide you with the products and services you request as well as information on other products and services offered by or through us. The law requires us to collect personal and/or sensitive information.
- 1.6 Your personal and/or sensitive information may be used by us to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required or allowed by law.
- 1.7 We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements.
- 1.8 You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please inform us so that we can correct it. If we deny access to your personal information, we will let you know why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than direct access to evaluative information connected with it.

PART B (COLLECTION OF PERSONAL INFORMATION)

2. WHY WE COLLECT INFORMATION

- 2.1 We collect personal information when it is reasonably necessary for one or more of our functions or activities.
- 2.2 These include:
 - (a) providing customers with the products and services they request and, unless they tell us otherwise, to provide information on products and services offered by us and external product and service providers for whom we act as agent. (If you have provided us with your email or mobile phone details, we may provide information to you electronically with respect to those products and services);
 - (b) complying with our legal obligations;
 - (c) monitoring and evaluating products and services
 - (d) gathering and aggregating information for statistical, prudential, actuarial and research purpose;
 - (e) assisting customers with queries; and
 - (f) taking measures to detect and prevent frauds.

3. INFORMATION WE MAY COLLECT

- 3.1 The personal and sensitive information we collect generally consists of name, address, date of birth, gender, marital status, occupation, account details, contact details (including telephone, facsimile and e-mail) and financial information.
- 3.2 In addition, we obtain your consent to collect, use and disclose credit information about you.
- 3.3 If you have or are applying for life insurance or income protection insurance, we also collect medical and lifestyle information that relates to the insurance. This information may include your sexual activity and is collected so we may assess whether to accept your insurance proposal and, if so, on what terms.
- 3.4 We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) in order to meet the standards set under those laws.
- 3.5 Where it is necessary to do so, we also collect information on individuals such as:
- (a) trustees;
 - (b) beneficial owners of a client; and
 - (c) persons dealing with us on a 'one-off' basis
- 3.6 We may take steps to verify the information we collect. For example, to meet our legal identification obligations, a birth certificate or drivers licence you provide may be verified against records held by government registries to protect against impersonation and fraud.

4. HOW WE COLLECT INFORMATION

- 4.1 We only collect personal information about you directly from you (rather than someone else) unless it is unreasonable or impracticable to do so or you have instructed us to liaise with someone else.

5. INFORMATION COLLECTED FROM SOMEONE ELSE

- 5.1 If it is impracticable or unreasonable for us to collect the personal information directly from you, we may collect such information from agents, or from your family members or friends. If you are not aware that we have collected the personal information, we will notify you of collection and the circumstances of collection, if we consider it is reasonable to do so.
- 5.2 The *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and *Anti Money Laundering and Counter-Terrorism Financing Rules Instrument 2007* (No. 1) require us to collect certain identification information about you. We must collect personal information from third parties in respect of AML/CTF checks which are required to be carried out, under AML/CTF Legislation.

6. INCOMPLETE OR INACCURATE INFORMATION

- 6.1 We may not be able to provide you with the products or services you are seeking if you provide incomplete or inaccurate information.

7. CONSENT

- 7.1 In most cases, before or at the time of collecting your personal information, we obtain your consent to the purposes for which we intend to use and disclose your personal information.

- 7.2 If you don't give us consent, we may not be able to provide you with the products or services you want. This is because we are required to collect this information to provide you advice.

8. WITHDRAWING CONSENT

- 8.1 You are free to withdraw your consent at any time. To withdraw your consent, please reach out to your Financial Adviser directly or contact our office. Please note that withdrawing your consent may mean we are no longer able to provide you with the financial products or services you have requested, as we require certain personal information to properly advise you.

9. SENSITIVE INFORMATION

- 9.1 In addition to the above conditions of collecting personal information, we only collect sensitive information about you if we obtain prior consent to the collection of the information or if the collection is required or authorised by law.

10. DEALING WITH UNSOLICITED PERSONAL INFORMATION

- 10.1 If we receive personal information that is not solicited by us, we only retain it, if we determine that it is reasonably necessary for one or more of our functions or activities and that you have consented to the information being collected or given the absence of your consent that it was impracticable or unreasonable for us to obtain it under the circumstances.
- 10.2 If these conditions are not met, we destroy or de-identify the information.
- 10.3 If such unsolicited information is sensitive information we will obtain your consent to retain it regardless of what the circumstances are.

PART C (INTEGRITY OF YOUR PERSONAL INFORMATION)

11. QUALITY OF PERSONAL INFORMATION

- 11.1 We ensure that the personal information we collect and use or disclose is accurate, up to date, complete and relevant.
- 11.2 Please contact us if any of the details you have provided to us change or if you believe that the information we have about you is not accurate or up to date.
- 11.3 We are committed to ensuring your personal information remains accurate and up to date. If we lose contact with you (for example, if mail or emails are returned to us), we may consult publicly available sources, such as telephone directories, to update your contact details so we can continue to manage your account and keep you informed.

12. SECURITY OF PERSONAL INFORMATION

- 12.1 We are committed to ensure that we protect any personal information we hold from misuse, interference, loss, unauthorised access, modification and disclosure.
- 12.2 For this purpose we have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.
- 12.3 Our security measures include, but are not limited to:

- (a) educating our staff as to their obligations with regard to your personal information;
- (b) requiring our staff to use passwords when accessing our systems;
- (c) encrypting data sent from your computer to our systems during Internet transactions and customer access codes transmitted across networks;
- (d) employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses from entering our systems;
- (e) using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing; and
- (f) providing secure storage for physical records.

12.4 As a financial services provider, we are required by law (including the *Corporations Act 2001* (Cth)) to retain most of your client records and advice documents for a minimum period of seven years. Once this statutory retention period has expired, and where the information is identified as no longer needed for any purpose, we ensure it is effectively and securely destroyed. For example, by shredding or pulping in the case of paper records, or by degaussing (demagnetising) and other secure means in the case of electronic records and equipment.

PART D (USE OR DISCLOSURE OF PERSONAL INFORMATION)

13. USE OR DISCLOSURE

- 13.1 If we hold personal information about you that was collected for a particular purpose (“the primary purpose”), we do not use or disclose the information for another purpose (“the secondary purpose”) unless:
- (a) we have obtained your consent to use or disclose the information; or
 - (b) you would reasonably expect us to use or disclose the information for the secondary purpose and the secondary purpose is:
 - (i) if the information is sensitive – directly related to the primary purpose; or
 - (ii) if the information is not sensitive – related to the primary purpose;
 - (c) the use or disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
 - (d) a permitted general situation exists in relation to the use or disclosure of the information by us; or
 - (e) a permitted health situation exists in relation to the use or disclosure of the information by us, in which case we de-identify the information before disclosing it; or
 - (f) we reasonably believe that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- 13.2 Where we use or disclose personal information in accordance with section 13(1)(e) we keep a copy of this disclosure (e.g.: the email or letter used to do so).

14. WHO WE MAY COMMUNICATE WITH

- 14.1 Depending on the product or service you have, the entities we exchange your information with include but are not limited to:
- (a) brokers and agents who refer your business to us;
 - (b) affiliated product and service providers and external product and service providers for whom we act as agent (so that they may provide you with the product or service you seek or in which you have expressed an interest);
 - (c) auditors we appoint to ensure the integrity of our operations;

- (d) any person acting on your behalf, including your solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
- (e) if required or authorised to do so, regulatory bodies and government agencies;
- (f) identity verification services;
- (g) insurers, including proposed insurers and insurance reference agencies (where we are considering whether to accept a proposal of insurance from you and, if so, on what terms);
- (h) medical practitioners (to verify or clarify, if necessary, any health information you may provide); and
- (i) other organisations who in conjunction with us provide products and services (so that they may provide their products and services to you).

14.2 Our use or disclosure of personal information may not be limited to the examples above.

15. OVERSEAS DISCLOSURE OF PERSONAL INFORMATION

15.1 We may disclose your personal information to service providers who operate outside Australia including New Zealand, Japan, South Africa, USA, member states of the European Union, India, Vietnam, Thailand, and the Philippines. The purpose of such disclosure is to facilitate the provision of financial services including the preparation of financial advice documents.

15.2 All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act.

16. COMMITMENT TO THE NOTIFIABLE DATA BREACHES (NDB) SCHEME

16.1 We are committed to complying with the requirements of the *Privacy Act 1988 (Cth)* and the Notifiable Data Breaches (NDB) scheme. We maintain internal processes to identify, assess, and respond to suspected or actual data breaches in a timely and responsible manner.

16.2 A *data breach* may occur when personal information is lost, accessed, or disclosed without authorisation. When we become aware of a potential breach, we promptly investigate to determine whether it is likely to result in serious harm to any individual whose personal information is involved.

16.3 If a breach is assessed as an *eligible data breach* under the NDB scheme, we will:

- (a) Take immediate steps to contain the breach and mitigate any potential harm;
- (b) Notify affected individuals as soon as practicable, including providing recommendations on steps they can take to protect themselves; and
- (c) Notify the Office of the Australian Information Commissioner (OAIC) in accordance with legislative requirements.

16.4 We review the circumstances of all data breaches, whether notifiable or not, to strengthen our systems and reduce the likelihood of future incidents.

17. OUTSOURCING

17.1 We may disclose your personal information when we outsource certain administrative functions. This can include bulk mailing, market research, direct marketing, document production, and information technology support. We may also seek expert help from time to time to improve our systems, products, and services.

17.2 In all circumstances where your personal information may become known to our contractors, agents, and outsourced service providers, strict confidentiality arrangements are in place. These parties are not permitted to use or disclose your personal information for any purpose other than providing their contracted services to us.

- 17.3 We take our obligations to protect your information very seriously and make every effort to deal only with service providers who share and demonstrate the same commitment to your privacy.

18. DISCLOSURE REQUIRED BY LAW

- 18.1 We may be required to disclose customer information by law e.g. under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter terrorism financing.

PART E (DIRECT MARKETING)

19. DIRECT MARKETING

- 19.1 From time to time, we or your Financial Adviser may use your personal information to send you marketing materials about products, services or updates that we believe may be of interest to you.
- 19.2 We will only use your information for this purpose if you would reasonably expect us to do so, or if you have given us your consent.
- 19.3 We want to ensure you only receive information you find valuable. You can easily opt out of receiving direct marketing any time. To stop receiving marketing materials, please contact your Financial Adviser directly or contact us:

Phone: 1300 429 160
Email: compliance@guidance-advisers.com.au
Postal Address: Level 15 Corporate Centre One
2 Corporate Court
Bundall QLD 4217

PART F (ADOPTION, USE OR DISCLOSURE OF GOVERNMENT IDENTIFIERS)

20. ADOPTION OF GOVERNMENT RELATED IDENTIFIERS

- 20.1 We do not adopt a government related identifier of an individual as our own identifier unless required or authorised to do so by or under an Australian law, regulation or court/tribunal order.

21. USE OR DISCLOSURE OF GOVERNMENT RELATED IDENTIFIERS

- 21.1 Before using or disclosing a government related identifier of an individual, we ensure that such use or disclosure is:
- (a) reasonably necessary for us to verify your identity for the purposes of activities or functions; or
 - (b) reasonably necessary for us to fulfil its obligations to a government agency or a State or Territory authority; or
 - (c) required or authorised by or under an Australian law, regulation or a court/tribunal order; or
 - (d) within a permitted general situation (other than the situation referred to in item 4 or 5 of the table in subsection 16A(1) of the Privacy Act); or

- (e) reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

PART G (ACCESS TO PERSONAL INFORMATION)

22. ACCESS

- 22.1 You can request us to provide you with access to the personal information we hold about you.
- 22.2 Requests for access to limited amounts of personal information, such as checking to see what address or telephone number we have recorded, can generally be handled over the telephone.
- 22.3 If you would like to request access to more substantial amounts of personal information such as details of what is recorded in your account file, we will require you to put your request in writing.
- 22.4 We respond to your request as soon as possible and in the manner requested by you. We endeavour to comply with your request within 14 days of its receipt but, if that deadline cannot be met owing to exceptional circumstances, your request will be dealt with within 30 days. It helps us provide access if you can tell us what you are looking for.
- 22.5 Your identity is confirmed before access is provided.

23. EXCEPTIONS

- 23.1 In particular circumstances we are permitted by law to deny your request for access or limit the access we provide. We let you know why your request is denied or limited if this is the case. For example, we may give an explanation of a commercially sensitive decision rather than direct access to evaluative information connected with it.

24. REFUSAL TO GIVE ACCESS AND OTHER MEANS OF ACCESS

- 24.1 If we refuse to give access to the personal information or to give access in the manner requested by you, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.
- 24.2 Additionally, we endeavour to give access in a way that meets both yours and our needs.

PART H (CORRECTION OF PERSONAL INFORMATION)

25. CORRECTION

- 25.1 We correct all personal information that we believe to be inaccurate, out of date, incomplete, irrelevant or misleading given the purpose for which that information is held or if you request us to correct the information.
- 25.2 If we correct your personal information that we previously disclosed to another APP entity you can request us to notify the other APP entity of the correction. Following such a request, we give that notification unless it is impracticable or unlawful to do so.

26. REFUSAL TO CORRECT INFORMATION

- 26.1 If we refuse to correct the personal information as requested by you, we give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.

27. REQUEST TO ASSOCIATE A STATEMENT

- 27.1 If we refuse to correct the personal information as requested by you, you can request us to associate with the information a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will then associate the statement in such a way that will make the statement apparent to users of the information

PART I (CONTACT US AND COMPLAINTS)

28. CONTACT

- 28.1 If you have any questions or would like further information about our privacy and information handling practices, or wish to update or access your personal information, please reach out to your Financial Adviser directly. Alternatively, you can contact Guidance Advisers by:

Phone: 1300 429 160
Email: compliance@guidance-advisers.com.au
Postal Address: Level 15 Corporate Centre One
2 Corporate Court
Bundall QLD 4217

29. MAKING A PRIVACY COMPLAINT

- 29.1 We offer a free internal complaint resolution scheme to all our clients. If you have a privacy complaint, you can initially raise your concerns with your Financial Adviser.
- 29.2 All complaints are handled in accordance with our Dispute Resolution Policy. A formal response will be provided within 30 calendar days of receipt.
- 29.3 To assist us in helping you, we ask you to follow a simple three (3) step process:
- Gather all supporting documents relating to the complaint;
 - Contact your Financial Adviser so they can review your situation and, if possible, resolve your complaint immediately.
 - If your Financial Adviser is unable to resolve the issue to your satisfaction, or if you prefer to contact us directly:

Phone: 1300 429 160
Email: compliance@guidance-advisers.com.au
Postal Address: Level 15 Corporate Centre One
2 Corporate Court
Bundall QLD 4217

- 29.4 If you are still not satisfied, you have free access to our external dispute resolution scheme, the Australian Financial Complaints Authority (AFCA), for issues relating to financial advice or investments:

Website: www.afca.org.au
Phone: 1800 931 678
Email: info@afca.org.au
Postal Address: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

You also have the right to contact the Office of the Australian Information Commissioner (OAIC). You can contact the OAIC to make a query concerning your privacy rights, or to lodge a complaint with the OAIC about how we have handled your personal information:

Website: www.oaic.gov.au
Phone: 1300 363 992
Postal Address: GPO Box 5288
Sydney NSW 2001