

APP Privacy Policy

Mainview Securities Pty Ltd (ABN 18 078 484 456) has an Australian Financial Services Licence (AFSL 241177) and trades under the name of the Hudson Financial Planning. Hudson Financial Planning is committed to respecting the privacy of its members and clients by ensuring that it manages any personal information it collects or holds in accordance with the Australian Privacy Principles ('APPs').

This APP Privacy Policy applies from 13 July 2018.

This APP Privacy Policy will be made available electronically on Hudson Financial Planning's website (www.hudsonfinancialplanning.com.au). Hudson Financial Planning will provide a copy of it free of charge and in any form reasonably requested (e.g. electronically or in hard copy).

Kinds of personal information Hudson Financial Planning collects and holds

Hudson Financial Planning will only collect personal information which is reasonably necessary for it to assist in providing personal financial product advice, financial restructuring, insurance or wealth creation products. Such information may include an individual's personal and contact details, employment details, tax file number, financial information, personal objectives and relevant health information. Without this information, Hudson Financial Planning would not be able to provide financial services to its members.

Can an individual remain anonymous when dealing with Hudson Financial Planning?

Given the nature of Hudson Financial Planning's products and services, other than providing general publicly available information, it is not practical for Hudson Financial Planning to deal with individuals who wish to remain anonymous or would prefer to identify themselves only by way of pseudonym.

How Hudson Financial Planning collects and holds personal information

When collecting, using or disclosing personal information, Hudson Financial Planning will take such steps as are reasonable in the circumstances to ensure that the information is accurate, up-to-date and complete.

Hudson Financial Planning will only collect personal information in a lawful and fair manner. Wherever possible, personal information will be collected directly from the individual, unless it is unreasonable or impracticable to do so. Sensitive information (e.g. health information for an insurance application) will only be collected where the individual consents to the collection of that information.

If Hudson Financial Planning receives unsolicited personal information it will, within a reasonable period of time, assess whether it would otherwise have been entitled to collect the information in accordance with this APP Privacy Policy. If the personal information could have been collected by Hudson Financial Planning, it will ensure that this APP Privacy Policy is complied with in respect of that information and it will notify the individual:

- (a) that the unsolicited personal information has been collected;
- (b) of the circumstances of that collection; and
- (c) provide access to a copy of this APP Privacy Policy.

If the personal information could not have been collected by Hudson Financial Planning, it will destroy the information or ensure that the information is de-identified.

At or before the time or, if that is not practicable, as soon as practicable after, Hudson Financial Planning collects personal information about an individual Hudson Financial Planning, will ensure the individual is aware:

- (a) of Hudson Financial Planning's identity and its contact details;
- (b) that the collection of personal information is permitted by Hudson Financial Planning under the *Corporations Act 2001* and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* and/or a particular court/tribunal order;
- (c) of the purpose for which Hudson Financial Planning collects the personal information;
- (d) of the main consequences (if any) for the individual if all or some of the personal information is not collected;
- (e) of any other entity (or type of entity) to which Hudson Financial Planning generally discloses the personal information it collects;
- (f) that Hudson Financial Planning's APP Privacy Policy contains information about how the individual may:
 - (i) access and seek correction of the personal information about the individual that Hudson Financial Planning holds; and
 - (ii) complain about a breach of the APPs and how Hudson Financial Planning will deal with such a complaint; and
- (g) of whether Hudson Financial Planning is likely to disclose the personal information to overseas recipients.

Unless permitted by law, Hudson Financial Planning will not adopt a government related identifier (e.g. a tax file number) of an individual as its own identifier and it will only disclose such identifiers for the purposes of verifying the identity of the individual, or as permitted by law or as is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Hudson Financial Planning will ensure that in relation to any personal information it holds that it will take such steps as are reasonable in the circumstances to protect the information from:

- (a) misuse, interference and loss; and
- (b) unauthorised access, modification or disclosure.

If Hudson Financial Planning holds information which it no longer needs (for any purpose for which the information may be used or disclosed) or it is no longer required to keep, it will take such steps as are reasonable in the circumstance to destroy the information or to ensure that the information is de-identified.

If there is a suspected or actual data breach which may compromise personal information, Hudson Financial Planning will promptly undertake an assessment of the incident. Where relevant, immediate steps will be taken to contain the breach. These steps may include limiting any further access or distribution of the affected personal information, or the possible compromise of other personal information.

If the unauthorised access, disclosure or loss of personal information is likely to cause serious harm to one or more individuals and the likely risk of serious harm has not been prevented by remedial action, Hudson Financial Planning will notify affected individuals and the Office of the Australian Information Commissioner as soon as practicable. The notification will include Hudson Financial Planning's identity and contact details, a description of the incident, the kind/s of information concerned and any recommended steps for affected individuals.

Following any data breach incident, Hudson Financial Planning will undertake a review process to help prevent future breaches.

The purpose for which Hudson Financial Planning collects, holds, uses and discloses personal information

Hudson Financial Planning collects, holds, uses and discloses personal information for the purposes of providing personal financial product advice.

Where Hudson Financial Planning collects an individual's personal information for a particular purpose (i.e. the primary purpose), it will not use that information for another purpose (i.e. a secondary purpose) unless the individual has consented to the use or disclosure of that information or:

- (a) it would be reasonably expected that the information would be disclosed for a secondary purpose which is related to the primary purpose (and in relation to sensitive information for a secondary purpose which is directly related to the primary purpose); or
- (b) the use or disclosure of the information is legally required, specifically authorised by the APPs or reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Hudson Financial Planning will record in writing circumstances where it uses or discloses personal information for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.

Hudson Financial Planning does not normally disclose personal information about its members to outside parties, except those contracted to provide services to Hudson Financial Planning. These may include:

- (a) property partner referrals, Hudson Financial Planning's professional advisers and service providers – e.g. auditors, lawyers, platform operators, fund managers, investment providers, custodian, insurer and consultants.

With consent, Hudson Financial Planning will disclose personal information to a members' accountant, financial consultant or other person or organisation they

nominate. Personal information may also be disclosed to the Australian Taxation Office or other government authorities or agencies as required by law.

If Hudson Financial Planning uses or discloses personal information for direct marketing purposes, it will include a simple and free means of 'opting-out' of receiving future direct marketing material and it will ensure that it respects such requests, within a reasonable period of time and notifies any other organisation it is using to facilitate the direct marketing. If Hudson Financial Planning has not collected the personal information directly from the individual, the 'opt-out' statement will be prominent. Hudson Financial Planning will only use sensitive information for direct marketing purposes where the individual has provided consent for it to be used for that purpose.

If Hudson Financial Planning uses personal information provided by a source other than the individual for direct marketing purposes, the individual may request Hudson Financial Planning to provide details of the source of the information. Hudson Financial Planning will provide this information free of charge and within a reasonable period of time.

If Hudson Financial Planning uses the personal information for direct marketing purposes, it will ensure that it complies with the requirements of the *Do Not Call Register Act 2006*, the *Spam Act 2003* and the *Corporations Act 2001*.

How an individual may access and seek correction of personal information held by Hudson Financial Planning

Generally, Hudson Financial Planning will provide an individual with access to their personal information in a manner they request and within a reasonable period of time after the request is made. An individual can request Hudson Financial Planning to correct any personal information it holds about that individual.

To apply for access or to request a correction to personal information, contact the **Privacy Officer** by:

Writing to: Hudson Financial Planning's Privacy Officer
GPO Box 1875, Brisbane Qld 4001

Calling: **1800 804 296**

Emailing: helpdesk@hudson-institute.com

There are no charges for an individual requesting access to personal information. However, Hudson Financial Planning may charge a fee for information accessed, provided that such fee is not excessive.

As set out in the APPs, some exceptions apply. If Hudson Financial Planning relies on one of the exceptions or is unable to provide the personal information in the manner requested by the individual, it will take such steps (if any) as are reasonable in the circumstances to give access in a way that meets the needs of both Hudson Financial Planning and the individual and it will provide a written notice setting out:

- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other relevant matter.

Having regard to the purpose for which the personal information is held, if Hudson Financial Planning is satisfied that the information is inaccurate, out of date, incomplete, irrelevant or misleading or a request is received from an individual, Hudson Financial Planning will take such steps as are necessary to correct that information. This will be done free of charge within a reasonable period after the request has been made. If Hudson Financial Planning has provided that information to a third party, the individual may request Hudson Financial Planning to notify that third party of that correction.

If Hudson Financial Planning refuses to correct an individual's personal information, it will provide a written notice to the individual setting out:

- (a) the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so; and
- (b) the mechanisms available to complain about the refusal; and
- (c) any other relevant matter.

If Hudson Financial Planning refuses to correct an individual's personal information and the individual requests Hudson Financial Planning to associate a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading with that information, Hudson Financial Planning must take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information. This will be done free of charge within a reasonable period after the request has been made.

How an individual can complain about a breach of the APP's and how the complaint will be dealt with

An individual may complain to Hudson Financial Planning about a breach of the APPs by Hudson Financial Planning by contacting the **Complaints Officer** by:

Writing to: Hudson Financial Planning's Complaints Officer, GPO Box 1875, Brisbane
Qld 4001

Calling: **1800 804 296**

Emailing: helpdesk@hudsonfp.com.au

The complaint will be handled in accordance with Hudson Financial Planning's Complaints Policy. An individual can request a copy of the Complaints Policy to be sent to them free of charge.

Is Hudson Financial Planning likely to disclosure personal information to overseas recipients?

No, Hudson Financial Planning is not likely to disclose personal information about an individual to an overseas recipient.

If at some future time, Hudson Financial Planning chooses to disclose personal information about an individual to an overseas recipient, it will either obtain the individual's informed consent prior to doing so, will be required to do so by Australian law or prior to doing so will take such steps as are reasonable in the circumstances to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to the information.