

# FINANCIAL SERVICES GUIDE

*A guide to our relationship with you and others*

***This Financial Services Guide comprises and must be read in conjunction with your adviser's current Adviser Profile that includes amongst other information, details of your adviser's remuneration.***

Distribution of this FSG by your adviser, who is a Lifespan Authorised Representative, is authorised by the licensee, Lifespan Financial Planning Pty Ltd (Lifespan).

This **Financial Services Guide ("FSG")** dated 1 January 2019 outlines your rights as a client and our obligations and responsibilities as the licensee and your adviser.

You have the right to ask us about our charges, the type of advice we will provide to you, and what you can do if you have a complaint about our services. This FSG is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service.

## **Who provides the financial services offered in the guide?**

The financial services are provided by Lifespan and your adviser. Lifespan's Australian Financial Service Licence and contact details are stated on the last page.

## **The key matters covered by the FSG include the following:**

- who Lifespan and your adviser are;
- how we can be contacted;
- how Lifespan and your adviser are paid;
- what services we are authorised to provide to you;
- details of any potential conflicts of interests;
- details of our dispute resolution procedures and how you can access them

## **Statements of Advice and Product Disclosure Statements**

You should also be aware that you must receive a Statement of Advice (SOA) and Product Disclosure Statements when personal advice involving a financial product is provided to you, i.e. advice that takes into consideration your personal objectives, financial situation and needs. The Statement of Advice will contain the advice, the basis on which it is given which may have influenced the advice. If your adviser provides further advice to you, but not in writing, and that further advice is related to the advice provided in a previous Statement of Advice, that further advice will be recorded in a Record of Advice (ROA). You may request an ROA from your adviser or Lifespan up to seven years after the further advice was provided at no additional cost. In the event we make a recommendation to acquire a particular financial

product (other than securities), we must also provide you with a Product Disclosure Statement containing information about the particular product that will enable you to make an informed decision.

## **Who is responsible for the financial services provided to me?**

Your adviser acts on behalf of Lifespan who is responsible for the advice given to you. However, your adviser may operate separate businesses which do **NOT** involve Lifespan in any way, such as: accounting; auditing; tax return preparation; self-managed super fund compliance and administration; property sales and referrals; and other products and activities. Therefore, Lifespan is **NOT** responsible for advice and work associated with products and services where your adviser is not acting as an authorised representative of Lifespan. If you are uncertain you should ask either your adviser or Lifespan Head Office who is responsible for that particular advice or transaction.

## **Who is Lifespan?**

Lifespan is a holder of an Australian Financial Services Licence which enables it to act as a financial services provider under the Corporations Act. Lifespan was established in August 1994 and is privately owned by the family interests of the Executive Chairman, John Ardino who has over 30 years experience in financial planning. Lifespan is a Professional Partner of the Financial Planning Association of Australia Ltd, and abides by their Code of Ethics and Rules of Professional Conduct. Lifespan provides a wide range of services to a large network of representatives across Australia to enable them to provide sound advice.

These services include: compliance; supervision; investment research and advice; ongoing professional development and training; an adviser help desk across all financial planning issues and general technical support and advice.

## **Does Lifespan have any relationships or associations with product issuers?**

Lifespan and Omniport Ltd have the same shareholders. Omniport Ltd is an unlisted public company, which is the promoter of the Omniport Wrap Service and the Wealthguard Portfolio Service.

The Omniport Wrap Service is issued by Avanteos Investments Ltd. The transactional, administrative and custodial systems underlying the Omniport Wrap Service are provided by Avanteos Investments Ltd, a company fully owned by the Commonwealth Bank. Lifespan has no ownership connections with any other financial product issuers.

The Wealthguard Portfolio Service is issued and administered by HUB24 Custodial Services Limited who provides the underlying transactional, administrative and custodial systems.

If appropriate for your needs and objectives, your adviser may recommend the Omniport and Wealthguard products to you.

### **What financial services are available to me?**

Financial planning basically involves determining your current situation; establishing your realistic and reasonable goals and needs including your risk profile; and exploring the costs and benefits, potential risks and returns, advantages and disadvantages of the various options reasonably available to you to reach those goals within the limits of relevant laws and available solutions. A course of action is recommended, selected and implemented. The results are periodically reviewed in the light of changes in investment markets, legislation and your own circumstances, needs and goals.

Unless their authorisation is restricted (see the Adviser Profile) Lifespan advisers can generally provide you with sound advice relating to a wide range of important areas such as wealth creation, retirement, redundancy, superannuation, risk insurance, estate planning, Centrelink payments, cashflow management, budgeting and debt repayments, structuring of investment portfolios, borrowing to invest, complex company and trust structures, and so on. Lifespan's research and technical support services enables advisers to provide value added advice on a broad spectrum of financial problems which takes into account relevant regulations pertaining to your situation and goals.

Lifespan is licensed to deal in and provide financial advice on the following range of financial products: Deposit and payment products, standard margin lending, managed investment schemes including Investor Directed Portfolio Services and Managed Discretionary Accounts, securities including shares, Retirement Savings Accounts, superannuation, life insurance investment and risk products and government issued debentures, stocks and bonds.

Lifespan advisers act on your instructions following your acceptance of their advice in the Statement of Advice. They and we should not act independently of your specific instructions (unless you decide to use Lifespan's managed discretionary account service). Any special instructions you provide should be communicated to your adviser in

writing. These instructions should be forwarded in an email, fax or posted letter to your adviser.

### **Tailored, general and ongoing advice**

Lifespan advisers usually provide advice tailored to your individual circumstances and generally have the capacity of implementing the advice they give, except where this may require the use of other professionals (accountants and lawyers). You may choose to enter into an agreement with your adviser to provide you with both initial advice and ongoing advice. If appropriate, we may also provide general advice only, where you are ultimately responsible for ensuring that this advice is suitable to your particular needs, personal circumstances and financial situation. In this case, you should also obtain any related product disclosure statements to assist in this purpose.

### **Should I transfer investment monies to a Lifespan Representative's account?**

Lifespan does not allow representatives to receive your investment funds into their own accounts or into any Lifespan trust account. You should at all times only transfer funds for financial products to those approved financial institutions recommended by your adviser (as specified in the Product Disclosure Statement or similar document), and never to any entity or person other than those institutions.

You should also not sign any blank forms; appoint your adviser as your attorney or authorised signatory without the written approval of Lifespan; or appoint any other person as your attorney or authorised signatory unless you have received legal advice.

### **What information should I provide to receive personalised advice?**

You will need to provide us with your current personal and financial situation such as details of assets, liabilities, income and expenses and personal objectives. This can best be accomplished by completing a Lifespan Client Data Form. The amount and type of information we will require from you depends on what financial services you require.

If you choose not to supply the required information, the advice you receive may not be appropriate to your needs, objectives and financial situation. You should read the warnings contained in the Statement of Advice carefully before making any decision relating to this limited advice and obtain any related product disclosure statements to assist you.

### **How will I pay for the services provided?**

Your adviser's specific method of remuneration and fees, including referral fees are detailed in their Adviser Profile. The exact details will be disclosed to you in an invoice or in the SOA.

All fees will need to be payable to Lifespan. If the adviser's remuneration includes commission paid by the product provider, such commission payment will be made to Lifespan. Lifespan pays 60% or more of all commissions and fees to your Adviser depending upon their total revenue.

### **How are any commissions, fees or other benefits calculated for providing the financial services?**

The three stages of financial planning are Initial Advice, Implementation and Ongoing Reviews. There is usually a separate fee for each of the three stages. Your adviser's remuneration structure for each advice stage will be found in their Adviser Profile and the dollar value disclosed to you in the SOA.

All commissions are payments made by the insurance product provider and are calculated as a percentage of the premium paid on insurance products. Commissions are of two types: (a) upfront or initial; and (b) ongoing or trail.

Fees can be based on either: a percentage of funds invested or funds under advice, or hourly rates multiplied by the hours worked, or an agreed dollar amount for the value of the specific service being performed, or a combination of these.

The typical ranges of commission and fee rates for investments and insurance products are as follows.

Upfront fees can vary between nil and 5.5% on investment products. Example: \$100,000 invested in a wrap service may involve an upfront fee payment of say 3% or \$3,000 which could be deducted from your investment account and paid to Lifespan leaving a net investment of \$97,000.

Ongoing fees can be collected by platforms and other product providers and the percentage based fees can be up to 2% pa but normally in the range of 0.5% to 1.5% pa depending on the size of the portfolio. Example: A portfolio of \$300,000 may be subject to an ongoing portfolio review fee of 1% per annum paid quarterly. This would amount to \$3,000 per annum.

Upfront commissions for the 2019 calendar year can be up to 77% of the premium paid on insurance products. For the 2020 calendar year it can be up to 66% and for the subsequent years it can be up to 66%.

Ongoing commissions can be up to 33%.

The precise amount of all these commissions and any other fees charged is provided in your Statement of Advice.

### **Additional Payments**

Lifespan has negotiated or will negotiate volume based and other additional volume based payments with several fund managers and platform providers including Omniport, and also with risk insurance providers. These volume based payments are sometimes referred to as

rebates or platform margins or other names. Volume based payments on various wholesale and retail managed funds and platforms range from 0.05% pa of funds under advice (FUA) to potentially 0.30% pa of FUA. These percentages may vary from year to year. Additional volume-based risk insurance commissions may range from 10% to 40% of the premiums paid. A share of this volume based commission currently ranging from nil to 60% may be payable to your adviser.

This share may vary from year to year and is dependent upon Lifespan's gross profit from your adviser's activities and other criteria. All relevant details of Lifespan's additional commissions on any financial products and the share your adviser receives will be fully disclosed in your Statement of Advice.

Please note that the ranges of all commission percentages referred to in this document may vary up or down at any time. The actual amounts relevant to you are provided in your SOA.

### **What should I know about any risks of the investments or investment strategies you recommend to me?**

Lifespan advisers may only recommend to you investment products that are researched, analysed and approved by Lifespan. Your adviser should explain any significant risks of investments and financial planning strategies. If the adviser does not do so, you should contact us to explain those risks to you.

### **Who do I complain to if I have a problem with your services?**

If you have a complaint about the service provided to you, you should take the following steps:

Contact your adviser and tell your adviser about your complaint;

If your complaint is not satisfactorily resolved within 3 business days, please contact The Compliance Manager, by telephone on (02) 9252 2000 or, in writing, at Level 23, 25 Bligh Street, Sydney NSW 2000. We will try to resolve your complaint quickly and fairly;

If you still do not receive a satisfactory outcome, you have the right to complain to the Australian Financial Complaints Authority (AFCA) on line at [www.afca.org.au](http://www.afca.org.au) or on the free call number - 1800 931 678. Lifespan is a member of this dispute resolution service.

Alternatively, you may contact the Australian Securities & Investments Commission (ASIC) on their Customer Contact Centre on 1300 300 630 which you may use to make a complaint and obtain information about your rights.

### **Compensation Arrangements**

Lifespan holds Professional Indemnity Insurance that complies with the compensation arrangements under Section 912B of the Corporations Act. The Professional Indemnity Insurance policy we hold covers the financial services provided by Lifespan's past and present representatives subject to the terms, conditions and exclusions of the policy wording. This insurance is not intended to cover product failure or general investment losses. Lifespan's policy covers loss or damage suffered by retail clients due to breaches of its obligations under Chapter 7 of the Corporations Act by the licensee and its representatives. This includes negligent, fraudulent or dishonest conduct.

### **What information do you maintain in my file and can I examine my file?**

As a provider of financial services, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a financial planning and advice service is dependent on us obtaining certain personal information about you.

We will collect information either directly from you or on your authority make investigations with others to obtain the information e.g. other professional advisers, accountant, superannuation fund, insurance and investment providers, etc.,

The primary purpose for the collection, maintenance and use of your personal information is to adequately provide to you the services you have requested.

If you do not disclose the information then the services may not be provided to you adequately or at all.

We maintain a record of your personal profile including details of your personal objectives, financial situation and needs. We also maintain records of any recommendations made to you. We are committed to implementing and promoting a privacy policy, which will ensure the privacy and security of your personal information. If you wish to examine your file please ask us. We will make arrangements for you to do so.

### **Our Privacy Policy**

Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and Australian Privacy Principles (APPs) Privacy Amendment (Enhancing Privacy Protection) Act 2012 which replaced the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000. Our privacy policy is available on our website or on request from us direct as detailed below.

### **Contact Us**

If you have any further enquiries please contact:

The Compliance Manager  
Lifespan Financial Planning Pty Ltd  
Suite 3, Level 23, Bligh Chambers, 25 Bligh Street  
Sydney NSW 2000

Postal Address:  
PO BOX R686  
Royal Exchange  
Sydney NSW 1225

Telephone: (02) 9252 2000  
Facsimile: (02) 9252 2330  
[eugene.serravalle@lifespanfp.com.au](mailto:eugene.serravalle@lifespanfp.com.au)

Lifespan Financial Planning Pty Ltd  
(ABN 23 065 921 735)  
Australian Financial Services Licence No: 229892  
[www.lifespanfp.com.au](http://www.lifespanfp.com.au)

### **Additional Privacy Information**

*Further information on privacy in Australia may be obtained by visiting the website of the office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au)*



***Security, Growth & Understanding***

# ADVISER PROFILE

*Information about your Lifespan Adviser*

***This Adviser Profile forms part of the Lifespan Financial Services Guide (FSG) dated 1 January 2019 and they should be read together. It states specific Adviser information and may assist you in making an informed decision.***

<p><b>Uneath N Prosper Pty Ltd</b>          is a Corporate Authorised Representative (ASIC No. 1237629) of Lifespan Financial Planning Pty Ltd (AFSL: 229892)</p> <p><b>Alison Thomas</b> is an Authorised representative (ASIC No. 385781) of Lifespan Financial Planning Pty Ltd (AFSL: 229892).</p>	<p>Po Box 885          Windsor NSW 2756          Tel: 02 4589 3490          Mobile: 0410158441          Email: alison@uneathwealth.com.au</p>
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## Your Adviser

Alison Thomas is a Financial Adviser, an Authorised Representative of Lifespan Financial Planning Pty Ltd (Lifespan) and Sole Director of Uneath N Prosper Pty Ltd T/as Uneath Wealth, a Corporate Authorised Representative of Lifespan Financial Planning Pty Ltd.

## Your Adviser's Authorisations

Alison is authorised to provide advice in relation to the following financial products:

- Deposit and Payment Products
- Government Debentures, Stocks or Bonds
- Life Products
- Managed Investment Schemes
- Retirement Savings Account Products
- Securities
- Superannuation
- Margin Lending

Uneath N Prosper Pty Ltd and Alison are both registered with the Tax Practitioners Board.

This means that Alison can assist you in meeting your financial planning needs and objectives in these areas, which include personal insurances, saving and investment as well as superannuation, retirement planning strategies and tax (financial) advice.

## Other Services

In addition to the services provided under Lifespan as described above, Alison also provides additional services through Uneath Wealth which do NOT involve Lifespan in any way. This includes: BAS Lodgement, Payroll services and book keeping services.

Lifespan is NOT responsible for advice and work associated with products and services where he is not acting as an authorised representative of Lifespan.

## Your Adviser's Experience

Alison completed her secondary schooling in 2004 and then commenced a Bachelor of Business (Finance) at Charles Sturt University. She also completed a Diploma of Financial Services (Financial Planning) in 2009, and currently completing Certified Financial Planning course with the Financial Planning Association of Australia.

In June 2009 Alison joined the Commonwealth Bank of Australia as a graduate and later become a financial planner. Whilst in this role, Alison gained valuable experience advising hundreds of clients on a wide variety of financial planning issues. Alison remained at CBA Bank until June 2010 when she left to join Count Financial as a Financial Adviser. Alison started Uneath Wealth in 2015 and now joined Lifespan Financial Planning in July 2018.

## Cost of Advisory Services

An initial meeting to discuss your financial circumstances is free of charge. At this meeting Alison will establish how he can assist you and gather the information required to prepare a financial plan.

Alison will discuss the fee basis with you and agree on the method of charging prior to proceeding.

Payment will be either by way of a fee based on a complexity of advice or from the brokerage paid by the product issuers. A fee for portfolio preparation or, if recommendations are not implemented, may also be charged. Ongoing advice that includes portfolio reviews

may be charged on a percentage fee basis which varies according to the portfolio amount, complexity and structure, or as a fixed dollar amount as agreed between you and your adviser. This will be fully disclosed in an ongoing service agreement.

The basis for the fee for the SoA will be agreed upon with you before any advice is provided or costs incurred. All other fees are fully disclosed in the Statement of Advice and Product Disclosure Statement prior to any charges being incurred.

<b>Preparation of Statement of Advice (SoA)</b> (depending on complexity)	Between \$440 to \$6,500
<b>Investment Portfolio Establishment</b> (depending on complexity) Maximum of 1% of investment value	Between \$440 to \$4,500
<b>Annual Portfolio Management &amp; Review</b> (depending on complexity and service level)	Between \$660 p.a. to \$10,100 p.a.
<b>Insurance</b> Upfront commission Ongoing commission *% based on amount of premium and is paid by the insurance provider	Up to 77%* Up to 33%*

**All fees include 10% GST.**

**All fees are payable to Lifespan, all of which are paid to Uneath N Prosper P/L. Alison receives a salary and as a director/shareholder of Uneath N Prosper P/L is entitled to a Director's drawing and/or dividend if and when paid.**

**Fee Examples:**

Example for Investment Products

If you receive advice regarding an investment of \$100,000, the SoA fee could be \$880, all of which is paid to Uneath Wealth by Lifespan. If you invest \$100,000 the establishment fee will be \$660, all of which is paid to Uneath Wealth by Lifespan. If you maintained the investment and assuming the balance of the investment remains at \$100,000, the annual portfolio management & review fee will be \$660 per annum, all of which is paid to Uneath Wealth by Lifespan.

Example for Risk Products

If you receive advice regarding insurance, the SoA fee \$660 all of which is paid to Uneath Wealth by Lifespan. If the policy is cancelled in the first two years ('responsibility period') you will be liable for the portion of the commission clawed back.

If you take out a life insurance policy with an annual premium of \$1500, assuming the highest commission for

the Upfront Option is selected at 77%, the upfront payment to Lifespan would be \$1,155, all of which is paid to Uneath Wealth by Lifespan. The maximum ongoing commission for the Upfront Option is currently 22% per annum which could result in a payment of \$330 per annum for as long as the policy remains in force, all of which is paid to Uneath Wealth by Lifespan. Where a level commission option is selected, it could be as much as 33%, or \$495, all of which is paid to Uneath Wealth by Lifespan.

This commission has what is called a 'responsibility period' imposed by the risk product issuer. This means that if the policy is cancelled within the first 1-2 years of inception commission is returned to the product issuer by Lifespan.

**Referral Fees**

Alison may pay the person who referred you to us a fee or commission in relation to that referral. If the referrer receives a fee or commission, we will tell you in the Statement of Advice who will receive that fee or commission and the amount they will receive.



Lifespan Financial Planning Pty Ltd

*POLICY DOCUMENT*

## PRIVACY POLICY

Date produced: 4/4/2016

**Lifespan Financial Planning Pty Ltd** ABN 23 065 921 735

Australian Financial Services Licence Number 229892 • Financial Planning Association of Australia Limited – Professional Partner

**Head Office** Level 23, 25 Bligh Street, Sydney • PO Box R686 Royal Exchange Sydney NSW 1225 • Tel: 02 9252 2000 • [www.lifespanfp.com.au](http://www.lifespanfp.com.au)

## OUR COMMITMENT

At Lifespan Financial Planning (Lifespan) we recognise that your privacy is very important. Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and Australian Privacy Principles (APPs) Privacy Amendment (Enhancing Privacy Protection) Act 2012 which replace the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000.

Our Privacy Policy sets out our commitment to those principles. We require all our staff (including our Authorised Representatives) to adopt our Privacy Policy.

A summary of the Australian Privacy Principles is available by contacting our office.

## ANONYMITY AND PSEUDONYMITY

You have the option of not identifying yourself or using a pseudonym when dealing with Lifespan unless it is impracticable for us to deal with you in this manner. If you elect to not identify yourself for a financial service we will inform you if it is impractical in those circumstances.

## COLLECTION

As a provider of financial services, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- (a) employment details and employment history
- (b) details of your financial needs and objectives
- (c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation
- (d) details of your investment preferences and aversion or tolerance to risk
- (e) information about your employment history, employment circumstances, family commitments and social security eligibility and
- (f) health information (required for some types of insurance)

We are required pursuant to the

- Corporations Act 2001,
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006,
- Taxation Administration Act 1953,

- Australian Securities and Investments Commission Act 2001,
- Superannuation Guarantee (Administration) Act 1992,
- Superannuation (Unclaimed Money and lost members) Act 1999

as those acts are amended and any associated regulations and Rules of Professional Conduct of the Financial Planning Association of Australia (FPA) to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

Generally, collection of your personal information will be effected in either face to face interviews, over the telephone or by way of an online client engagement form. Additional and/or updated personal information may be collected through one or more of those methods as required.

Information may be received from 3<sup>rd</sup> parties such as accountants, solicitors or referring entities. This information will usually be information that we determined could have been collected from you directly. However, should we determine otherwise and the information is not contained in a Commonwealth record, we will as soon as practicably possible either destroy or de-identify it as long as it is lawful to do so.

## USE AND DISCLOSURE

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial plan
- the provision of financial planning advice to you
- making securities and investment recommendations
- reviewing your financial plan
- reviewing securities and investment recommendations
- risk management

We will not use or disclose Personal Information collected by us for any purpose other than:

- 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; or
- where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

We are required under the Rules of Professional Conduct of the FPA to make certain information available for inspection by the Association on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission (ASIC).

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

We may disclose your personal information to another financial planner during periods when this office is unmanned or closed so that you can be assured of receiving a continued service.

We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any agent or representative in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

It is not likely that personal information will be disclosed to overseas recipients. In the case that we were to disclose your personal information to an overseas recipient you will be made aware of the countries in which recipients are likely to be located if it is practicable to do so.

We may store your information in a cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

If we do disclose your personal information to an overseas organisation we will take reasonable steps to ensure that the overseas organisation complies with the APPs or the equivalent legislation in its jurisdiction.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be mishandled or disclosed by them. In the event that a sale of our business is to take place and depending on the transaction type, the consent of the individuals concerned before the sale is made may be sort, All clients will be advised of the transfer of their personal information to the purchaser of the business.

## DOCUMENT SECURITY AND STORAGE

Your personal information is maintained securely and is generally held in your client file. Information may also be held in a computer database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

## ACCESS AND CORRECTION

You may at any time, request access to your personal information by contacting your adviser (our Authorised Representative) or Privacy Officer. We will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you with access to your personal information if:

- (a) providing access would pose a serious threat to the life or health of a person
- (b) providing access would have an unreasonable impact on the privacy of others
- (c) the request for access is frivolous or vexatious
- (d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- (e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations
- (f) providing access would be unlawful
- (g) denying access is required or authorised by or under law
- (h) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security

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

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness and we will, if we agree that the information requires correcting, take all reasonable steps to amend the information.

We will endeavour to respond to any request for document access within 14-30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

## IDENTIFIERS

Generally, we will not adopt or use an identifier (eg, TFNs, Medicare numbers, etc) that has been assigned by a government agency and may be provided by you to group, sort or identify people. We will only disclose the information to another entity where you authorise that disclosure or where we are required to do so by law (e.g. tax File Numbers to product issuers or trustees of superannuation fund).

## INFORMATION COLLECTED ONLINE

Lifespan's web site may contain links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

While it is not necessary to register your personal details to use our Web site, we do offer a registration service which will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address.

If you have registered with us and you wish to update your registration details or decide, at any time, that you do not wish to receive any further information from us, you can give effect to this by following the instruction on the website or by contacting us directly.

Our Web site may use cookies which allows us to identify your browser while you are using our site. Cookies do not identify you, 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 allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

## PRIVACY COMPLAINTS

This Privacy Policy and the legislation which governs it has been established to promote and protect your privacy rights. If you believe your personal information has been mishandled or there has been a breach of privacy, you may lodge a complaint directly with our Privacy Officer by contacting us on the details below. Your complaint will be thoroughly investigated and responded to within 5 working days. We endeavour to satisfactorily resolve all complaints and encourage our clients to resolve complaints directly with our organisation, however, if you are unhappy with our response, you are entitled to escalate your complaint to the Office of the Australian Information Commissioner.

## CHANGES TO THIS PRIVACY POLICY

We reserve the right to review and amend this Privacy Policy in accordance with legislative changes and our business requirements.

## CONTACT US

If you have any further enquiries regarding privacy issues or require further information relating to our Privacy Policy, please contact our Privacy Officer, Eugene Serravalle.

Level 23, 25 Bligh Street, Sydney 2000

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## ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the website of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au)