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JBS FINANCIAL STRATEGISTS PRIVACY POLICY



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About this policy

JBS Financial Strategists Pty Ltd (ABN 34 088 711 528)

Australian Financial Service (AFS) Licence No. 486674 (JBSFS)

Version	Effective Date	Approved By
2.0	01/11/2018	Responsible Managers

This Policy will be reviewed by the JBSFS Management and Compliance Committee at least annually or as changing circumstances warrant.

We respect your privacy

JBS Financial Strategists Pty Ltd (JBSFS) respects your right to privacy and is committed to safeguarding the privacy of our clients and website visitors. We adhere to the Australian Privacy Principles contained in the Privacy Act 1988 (Cth). This policy sets out how we collect and treat your personal information. We will however only collect personal information that is necessary in the delivery of providing financial planning advice, assists in the implementation of that advice and provide ongoing services to you.

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not. "Personal information" is information we hold which is identifiable as being about you.

We may collect and hold personal information for the purposes of enabling us to provide financial services to you. For example, in order for us to provide personal advice to you, we are required to verify your identity and obtain information relating to your financial situation and your personal goals and objectives – this is so we can assess your personal situation and provide you with appropriate financial advice. This information is generally collected directly from you as our client.

Any personal information collected by us is solely for the purpose of providing services to you and will not be disclosed unless the disclosure is required in the performance of those services (for example, disclosing your information to a financial institution in order to place an investment on your behalf).

Collection of personal information

JBS Financial Strategists Pty Ltd will, from time to time, receive and store personal information you enter onto our website, enter or update in our software system (xplan), provided to us directly via meetings, emails, phone conversations or given to us in other forms.

You may provide basic information to enable us to send information, provide updates, etc. We then collect additional information at other times, including but not limited to when you provide information about your personal or business affairs, at fact finding and other meetings, in phone conversations, when you provide authority for us to contact third parties such as an insurance providers, when you update your details with us, provide financial or credit card information, respond to surveys and/or promotions, or communicate with our client services people. The sorts of information that we would usually be collecting includes:

- Name/s
- Date of birth
- Phone numbers
- Residential & postal address
- Email address
- Assets & liabilities
- Employment information including income
- Health status
- Investment, Superannuation and insurance policy details

Additionally, we may also collect any other information you provide while interacting with us, from publically available sources or when you have given us authority to interact with a third party, such as your accountant or health professionals.

JBSFS sometimes needs to collect and use sensitive information, such as when we are considering personal insurance recommendations or when assisting you with an insurance claim.

Sensitive information (according to the Privacy Act) includes but is not limited to:

- Racial or ethnic origin
- Political opinions
- Membership of a political association
- Religious beliefs or affiliations
- Philosophical beliefs
- Members of a professional or trade association
- Sexual orientation or practices
- Criminal record

JBSFS collects personal information from you in a variety of ways, including when you interact with us electronically or in person, when you access our website and when we provide our services to you. We may receive personal information from third parties. If we do, we will protect it as set out in this Privacy Policy.

Use of your personal information

JBSFS may use personal information collected from you to provide you with information, updates and our services. We may also make you aware of new and additional products, services and opportunities available to you. We may use your personal information to improve our services and better understand your needs.

Understanding and meeting our clients' financial needs over the course of their lifetime is a central part of our business. Any personal information collected by JBSFS is solely for the purpose of providing services to you and is not disclosed unless the disclosure is required in the performance of those services (for example, disclosing your information to a financial institution in order to place an investment on your behalf or providing information to an insurance provider to implement personal insurance cover).

JBSFS may contact you by a variety of measures including, but not limited to telephone, email, sms or mail.

Disclosure of your personal information

We may disclose your personal information to any of our employees, officers, insurers, professional advisers, agents, suppliers or subcontractors insofar as reasonably necessary for the purposes set out in this Policy. Personal information is only supplied to a third party when it is required for the delivery of our services.

We may from time to time, need to disclose personal information to comply with a legal requirement, such as a law, regulation, court order, subpoena, warrant, in the course of a legal proceeding or in response to a law enforcement agency request.

We may also use your personal information to protect the copyright, trademarks, legal rights, property or safety of JBS Financial Strategists Pty Ltd, www.jbsfinancial.com.au, its customers or third parties.

Information that we collect may from time to time be stored, processed in or transferred between parties located in countries outside of Australia. JBSFS utilises outsourced resources in the Philippines. The purpose of such disclosure is to facilitate the provision of services for you. Strict privacy and security guidelines have been put in place to ensure that the privacy of information complies with this Privacy Policy.

If there is a change of control in our business or a sale or transfer of business assets, we reserve the right to transfer to the extent permissible at law our user databases, together with any personal information and non-personal information contained in those databases. This information may be disclosed to a potential purchaser under an agreement to maintain confidentiality. We would seek to only disclose information in good faith and where required by any of the above circumstances.

By providing us with personal information, you consent to the terms of this Privacy Policy and the types of disclosure covered by this Policy. Where we disclose your personal information to third parties, we will request that the third party follow this Policy regarding handling your personal information.

Security of your personal information

JBSFS is committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

We are a paperless office, with your personal information saved on our financial planning software that has its own security and safety measures. Data is encrypted and all users have their own login details with individual passwords. All movements in the system are date and time stamped by the individual user so any unauthorised access, change or misuse of information can be identified immediately.

The transmission and exchange of information is carried out at your own risk. We cannot guarantee the security of any information that you transmit to us, or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Dealing with unsolicited personal information

If we receive unsolicited personal information, we will within a reasonable period after receiving the information, determine whether we could have collected the information under Australian Privacy Principle (APP) 3. If the information could not have been obtained under APP 3 we will take steps to destroy or de-identify the information as soon as practicable, if it is lawful and reasonable to do so.

Access to your personal information

You may request details of personal information that we hold about you in accordance with the provisions of the Privacy Act 1988 (Cth). A small administrative fee may be payable for the provision of information. If you would like a copy of the information which we hold about you or believe that any information we hold on you is inaccurate, out of date, incomplete, irrelevant or misleading, please email us at strategies@jbsfinancial.com.au or your adviser. If you find that any information is incorrect, please inform our office immediately as this may change the recommendations being made for your personal situation.

We reserve the right to refuse to provide you with information that we hold about you, in certain circumstances set out in the Privacy Act.

Data Breach

A data breach occurs when personal information held by us is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference. Examples of a data breach are when a device containing personal information of clients is lost or stolen, or when a database containing personal information is hacked or if we mistakenly provide personal information to the wrong person.

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017, we have an obligation to assess within 30 days whether a data breach amounts to an 'eligible data breach' if we become aware that there are reasonable grounds to suspect that data breach may have occurred.

If we form the view that the data breach would likely result in serious harm to any of the individuals to whom the information relates despite any remedial action taken by us, then the data breach will constitute an 'eligible data breach'. If an eligible data breach occurs, we have an obligation to notify you and the Office of the Australian Information Commissioner and of the details of the eligible data breach.

Website

When you visit our website

When you come to our website (www.jbsfinancial.com.au) we may collect certain information such as browser type, operating system, website visited immediately before coming to our site, etc. This information is used in an aggregated manner to analyse how people use our site, such that we can improve our service.

Cookies

We may from time to time use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. Most web browsers automatically accept cookies but you can choose to reject cookies by changing your browser settings. However, this may prevent you from taking full advantage of our website.

Third party sites

Our site may from time to time have links to other websites not owned or controlled by us. These links are meant for your convenience only. Links to third party websites do not constitute sponsorship or endorsement or approval of these websites. Please be aware that JBS Financial Strategists Pty Ltd is not responsible for the privacy practises of other such websites. We encourage our users to be aware, when they leave our website, to read the privacy statements of each and every website that collects personal identifiable information.

Complaints about privacy

If you have any complaints about our privacy practices, please feel free to send us details of your complaint. We take complaints very seriously and will respond shortly after receiving a written notice of your complaint.

Attention: Jennifer Brown
JBS Financial Strategists
PO Box 7441 | Melbourne VIC 3004
Email: strategies@jbsfinancial.com.au
Phone: 03 8677 0688

It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are still unhappy with our response, then you are entitled to contact the Office of the Australian Information Commissioner, who may investigate the complaint further.

You may also like to contact us for the following:

- find out what personal information we hold about you;
- update or correct the personal information we hold about you;
- opt out of receiving direct marketing material
- make a privacy related complaint.

Please feel free to contact our office on 03 8677 0688 or email us on strategies@jbsfinancial.com.au.

Changes to Privacy Policy

Please be aware that we may change this Privacy Policy in the future. We may modify this Policy at any time, in our sole discretion and all modifications will be effective immediately upon our posting of the modifications on our website. Please check back from time to time to review our Privacy Policy.