

Data Handling and Electronic Verification Statement

Effective date 1 October 2021



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Introduction

TPT Wealth Limited (We/Us) through its partners Link Group Pty Ltd (ABN 81 615 082) and Lab Group Services Pty Ltd (ABN 61 168 48414) (Partners) undertake online customer account opening, management and electronic identity verification. If you apply for an account with TPT Wealth online, we will collect and verify information about you from you (and others) and utilise these services to support us.

We are bound by the *Privacy Act 1988 (Cth)* and We are committed to respecting and protecting your personal information, i.e. any information that we hold about you through which you may be identified.

This statement explains how we collect, hold, use and disclose your personal information within the application process.

By providing personal information to us, you consent and authorise us to do these things and you also give us the benefit of all consents in relation to your information that you have given to us – even if they are not found in this document.

How we collect your information

We will usually collect information directly from you via our account opening software provided by our Partners. Sometimes we will need to source personal information about you from a third party such as but not limited to a credit reporting agency or government agency.

If you have previously opened an account with TPT Wealth, we may already hold information about you and have identified you. If so, we will share information we already hold.

If you do not provide your personal information to us, we will not be able to verify your identity or process your account application through this application process.

What personal information we collect

We only collect personal information about you that we need in order to provide account opening, management and identity verification services.

This may include, but is not limited to your name, date of birth, contact details, tax file number, Medicare number or other government identifier, financial information, employment, credit history, transaction history and other information we are required by law to collect.

We will only collect sensitive information about you, i.e. information about your racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record or health information, if we are required to do so by law.

How we use your personal information

We use the personal information we collect about you for the following purposes:

- verify and authenticate your identity;
- verify the accuracy of some information you have provided, e.g. your tax file number or Medicare number; and
- pass your information and identity verification to our Partners so they can assist us manage your account.

We may use your personal information for related purposes if we believe you would reasonably expect us to do so, including providing you with information that may be of interest to you (unless you have opted not to receive such information). We may use your personal information for purposes required by law.

To whom we disclose your personal information

We will always disclose your personal information and identify verification information to our Partners with whom you apply to open an account.

Under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* we are required to verify your identity. In order to verify your identity electronically, we will ask you for your details (such as your name, address, date of birth) and details of your identification documents. This information will be passed on to external organisations in order to electronically match your information with information on their databases.

By applying you agree to provide your personal information to our Partners and third party service providers so that we can identify you. The entities that we use to help us can include but are not limited to:

- Credit reporting bodies;
- Government agencies;
- External data storage providers such as Equifax Pty Ltd;
- Publicly available information such as white pages; and
- Information held by the official record holder via third party systems.

It is an offence under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* to provide false and misleading information about your identity.

Although it is unlikely that we will provide your personal information to overseas recipients, some of our suppliers may. We will take reasonable steps to ensure that they do not provide your information to anyone who will not protect it in a similar way to us.

We may disclose your personal information to our affiliates and related companies. We will always require anyone to whom we provide your personal information to manage it substantially in accordance with this statement.

We may also provide your information to third parties if we are required to do so by law or under some unusual circumstances which are permitted under the *Privacy Act 1988 (Cth)*.

Data aggregation

We will de-identify and aggregate information we hold about you and other individuals by removing information that could identify you. We will use this anonymised data for internal purposes, e.g. to obtain insights about our

business and identify opportunities for improvement in our services, and we may make it available to third parties where appropriate to assist them to improve their business and services (but not to re-identify you).

Security of your personal information

We will take all reasonable steps to ensure that your personal information is stored safely and securely. We protect your personal information by restricting access to your personal information and by securely destroying or de-identifying your information when it is no longer needed.

Updating your personal information

If you wish to access, correct or update your personal information, please contact us on **1300 138 044** or via email at info@tptwealth.com.au.

Complaints and Feedback

We take your feedback seriously and aim to provide simple, easy to use and trustworthy services to our customers. We see your complaint or feedback as an opportunity to improve the way we do things.

How can I lodge a complaint?

You can advise us of your complaint or provide feedback by:

- using the online form available at tptwealth.com.au;
- emailing us at mycomplaint@tptwealth.com.au;
- calling us – 1300 138 044 (between 9:00am and 5:00pm Monday to Friday, except on public holidays); or
- writing to us at Complaints & Feedback, GPO Box 227, Hobart Tasmania 7001

What should my complaint include?

So that we can resolve your complaint as quickly as possible, it is important that you provide us with as much information as possible. This includes details such as:

- your investor or account number or the estate/trust name, your name and details of preferred contact method;

- complaint or feedback information – what is your complaint or feedback about and when did it happen; and
- resolution – how would you like the matter resolved.

What are the options available if I need more help?

Our team can assist you with Translator Interpreter Services (TIS) if you speak limited English, or to use the National Relay Service if you have difficulties with hearing.

You may wish to contact a financial counsellor for free, independent advice about your situation. The National Debt Helpline website (ndh.org.au) has easy to use, step-by-step guides on how to tackle debts. You can also call the National Debt Helpline on 1800 007 007 to talk to a financial counsellor.

What are the response timeframes?

We will try our best to resolve the complaint for you straight away, and in most cases we can.

If we can't we will:

- Acknowledge that we've received your complaint within 24 hours or one business day;
- Keep you up to date on our investigation and progress;
- Provide you with final resolution within 30 days - if not, we will inform you of the reasons for delay and when we expect to resolve;
- If your complaint relates to credit involving default notices or financial hardship, we will provide you with a final resolution within 21 days;
- If your complaint relates to traditional trustee services, we will provide you with a final resolution within 45 days.

What if my complaint isn't resolved to my satisfaction?

If you're not satisfied with the outcome provided to you, the first step is to request the complaint be escalated to a manager of the department you've been speaking with.

In the event you are not satisfied with the Managers response, you have a few more options as outlined below.

Senior Manager Review

You can request for your complaint to be escalated to a Senior Manager who will review your complaint outcome.

Senior Manager Review

Phone: 1300 138 044

Email: mycomplaint@tptwealth.com.au, addressed to the Senior Manager

Post: Complaints & Feedback Senior Manager Review, GPO Box 227, Hobart Tasmania 7001

Customer Advocate

You can request for your complaint to be escalated to our Customer Advocate. The Customer Advocate while not independent, is impartial and focuses on achieving a fair outcome for our customers. Our Customer Advocate will review your complaint outcome to make sure that your complaint was handled fairly.

Customer Advocate

Phone: 1300 138 044

Email: customeradvocate@tptwealth.com.au

Post: Customer Advocate
GPO Box 227, Hobart Tasmania 7001

Please allow us the opportunity to resolve your complaint through our internal complaint management process, as detailed above, prior to escalating through any other channels.

External Review

TPT Wealth is a member of the Australian Financial Complaints Authority (AFCA).

AFCA is an external dispute resolution body that deal with complaints regarding the financial services industry. It is good practice to go via the internal complaint resolution processes, prior to escalating a complaint with AFCA.

Australian Financial Complaints Authority

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678

Post: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

Privacy Complaints

If your complaint is about how we handle your personal information, you can also contact the Office of the Australian Information Commissioner.

Office of the Australian Information Commissioner (OAIC)

Online: www.oaic.gov.au

Phone: 1300 363 992

Post: OAIC, GPO Box 5218, Sydney NSW 2001

For full information on our Privacy Policy

If you would like more information on how we use our information please see our full privacy policy available in this application.

