



**AlmanPartners**  
*True wealth*

# Privacy Policy

Great ideas for *your* financial future

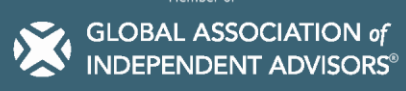


**Version 1.3**  
**12<sup>th</sup> February 2021**

Alman Partners is an accredited FPA Professional Practice



Member of



Accredited by



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## **PRIVACY POLICY**

This Policy was last updated on 12<sup>th</sup> February 2021.

Alman Partners Pty Ltd ACN: 090 789 218 (**'we'**, **'our'**, **'us'**) is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

By voluntarily supplying us with your personal or credit information, you are agreeing to be bound by this Policy. While we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

### **Collection of personal information**

We normally collect personal information directly from you but if you have consented, we may also collect personal information from a third party. The type of information we hold varies depending on the type of product or service we provide to you. For example, Alman Partners will hold different information about you if we develop a comprehensive financial plan than we will hold if we are recommending life insurance products.

The personal information we may collect and hold about you includes:

- contact information such as your name, address, telephone numbers and email address;
- financial information, including bank account details and credit card details;
- business details, including Australian Business Number ("ABN");
- occupation, your employer's name and address, your salary;
- the names and addresses of your dependants or beneficiaries;
- tax file number, where you have given it to us;
- health information (for insurance purposes);
- insurance claim information, where this is relevant;
- other information that you have given us.

## **Means of collection of personal information**

Your personal information may be collected in a number of ways, including:

- directly by our staff when you seek, or enquire about our services;
- via telephone or email;
- via our Personal Financial Profile (data collection document); or
- when you use our website or complete a form on our website.

In some circumstances, where it is unreasonable or impracticable to collect information from you, we may collect information about you from a third-party source. For example, we may collect information from a publicly maintained record or from relevant fund or service providers. You need not provide all the information requested by us, but this may prevent us from providing some or all of our goods or services to you.

## **Use, disclosure & purpose**

We collect, hold and disclose your personal information for the purposes related to the provision of financial services including:

- Preparation of your financial plan;
- Provision of financial planning advice to you;
- To verify identity and for customer due diligence purposes;
- Making securities and investment recommendations; or
- Reviewing your financial plan, securities and investment recommendations.

We will only use your information for the purposes for which it was collected ("primary purposes") or a purpose related to the primary purpose, if this use would be reasonably expected by you, or otherwise, with your consent.

Alman Partners Pty Ltd will only disclose your personal information for a purpose related to the services you are procuring from us. Information provided to third parties will be dealt with in accordance with that entity's privacy policy. Information provided will be held in the strictest confidence by us. We do not give information about you to anyone else unless one of the following applies:

- It is necessary in order to provide you with the financial services you expect us to, or we have told you we will;
- You have consented; or
- It is required or authorised by law.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

Where we use an external third party in the course of providing our services to you, we will provide your personal information to that external service provider for the exclusive purpose of assisting us to provide services to you. We use external service providers to assist us in providing advice. We will also disclose your personal information where such disclosure is required by law.

We disclose your personal information to third parties that:

- Manage and enhance our customer database including Enzumo.
- Send marketing information to you on our behalf including MailChimp, Strategic Media Partners; and
- Other purposes related to the above.

We do not sell or license your information to third parties.

If you do not consent to such disclosure, we will not be able to provide you with financial services. The types of organizations to whom we typically disclose your personal information include administration services, information technology staff (for the purpose of maintenance of our IT systems) and related service providers, superannuation trustees, product issuers including insurance companies as well organizations undertaking compliance reviews of our representatives or other due diligence undertaken on us or our representatives. If we transfer personal information outside Australia, we comply with trans-border data flow privacy standards under the Privacy Act, for example, by taking reasonable steps to protect the information being held, used or disclosed by the recipient pursuant to the Australian Privacy Principles.

Should you wish to authorise the disclosure of your personal information to other parties, please notify us in writing. We may use personal information collected from you to advise you about other financial products and services or survey your opinions on products or services. You may elect not to receive such information by contacting your

representative or writing to the company's Privacy Officer, in which case, we will record that you do not want to receive marketing material.

If you choose to not provide identity information and personal information, or information that is incomplete or inaccurate, it may:

- Mean that we cannot provide you with financial services;
- Result in you paying more tax than may otherwise apply;
- Result in the provision of a financial service that is not appropriate to your circumstances, needs and objectives.

Alman Partners may collect client personal information when purchasing other financial advisory businesses.

### **Quality, access to & correction of information**

You are entitled to have access to and seek correction of any personal information that we may hold about you. We require that requests for access to or to update or correct your personal information to be in writing outlining the details of your request. Such requests should be addressed to the Privacy Officer via the details provided in this Policy.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information.

We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request. We will, on request, provide you with access to your personal information or update or correct your personal information, unless we are lawfully excluded from granting your request, including if:

- giving access would be unlawful;
- we are required or authorised by law or a court/tribunal order to deny access; or
- giving access is likely to prejudice one or more enforcement related activities conducted by an enforcement body.

Where your request for access is accepted, we will provide you with access to your personal information in a manner, as requested by you, providing it is reasonable to do so.

Your request for correction will be dealt with within 30 days, or such longer period as agreed by you. If we deny your request, we will provide you with a written notice detailing reasons for the refusal and the process for making a complaint about the refusal to grant your request.

### **Storage and Security**

Your personal information will be stored as physical files in a secured area, on our electronic data base system and on computers with appropriate back up and security systems. Any personal information which is collected via our website, or which is held on our computer systems, is protected by safeguards including physical, technical (including firewalls and SSL encryption) and procedural methods.

We take reasonable steps to hold information securely in electronic or physical form. We are committed to keeping secure the data you provide to us and we will take all reasonable precautions to protect your personally identifiable information from loss, misuse, interference, unauthorised access or alteration.

We aim to achieve this through:

- putting in place physical, electronic and procedural safeguards in line with industry standards;
- imposing confidentiality requirements on our employees and outsourced providers, requiring any third party providers have acceptable security measures to keep personal information secure;
- implementing policies in relation to document storage security;
- implementing security measures to govern access to our systems;
- only providing access to personal information once proper identification has been given;
- controlling access to our premises;
- implementing website protection measures; and

- When we store your data we use Advanced Encryption Standard (AES) with 256-bit keys. If we need to transmit your data it will be via secure portals and/or password protected.

While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you in accordance with our obligations under the Privacy Act.

If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

### **Dealing with us anonymously**

Where lawful and practicable to do so, you can deal with us anonymously or using a pseudonym. You can deal with us anonymously or using a pseudonym when making a general enquiry about the goods and services that we can offer to you including via telephone or our website.

At the time you purchase our goods or engage our services, it is no longer practicable for you to deal with us anonymously or using a pseudonym as we will not be able to provide services to you without this information.

### **Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Office with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:



Director of Compliance Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#).

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## **WEBSITE TERMS & CONDITIONS**

These terms and conditions outline the rules and regulations for the use of Alman Partners' website.

Alman Partners is located at:

*8 Brisbane Street, Mackay QLD 4740; and*

*Level 6, 307 Queen Street, Brisbane City Qld 4000*

By accessing this website, we assume you accept these Terms and Conditions in full. Do not continue to use Alman Partners' website if you do not accept all of the Terms and Conditions stated on this page.

The following terminology applies to these Terms and Conditions, Privacy Statement and Disclaimer Notice and any or all Agreements: "Client", "You" and "Your" refers to you, the person accessing this website and accepting the Company's terms and conditions. "The Company", "Ourselves", "We", "Our" and "Us", refers to our Company. "Party", "Parties", or "Us", refers to both the Client and ourselves, or either the Client or ourselves. All terms refer to the offer, acceptance and consideration of payment necessary to undertake the process of our assistance to the Client in the most appropriate manner, whether by formal meetings of a fixed duration or any other means, for the express purpose of meeting the Client's needs in respect of the provision of the Company's stated services/products, in accordance with and subject to, prevailing law of Queensland. Any use of the above terminology or other words in the singular, plural, capitalisation and/or he/she or they, are taken as interchangeable and therefore as referring to same.

### **Cookies**

We employ the use of cookies. By using Alman Partners' website you consent to the use of cookies in accordance with Alman Partners' Online Privacy Policy.

Most of the modern-day interactive websites use cookies to enable us to retrieve user details for each visit. Cookies are used in some areas of our site to enable the functionality of this area and ease of use for those people visiting. Some of our affiliate/advertising partners may also use cookies.

## **License**

Unless otherwise stated, Alman Partners and/or its licensors own the intellectual property rights for all material on Alman Partners. All intellectual property rights are reserved. You may view and/or print pages from <https://www.alman.com.au/> for your own personal use subject to restrictions set in these Terms and Conditions.

You must not:

1. Republish material from <https://www.alman.com.au/>;
2. Sell, rent or sub-license material from <https://www.alman.com.au/>;
3. Reproduce, duplicate or copy material from <https://www.alman.com.au/>; or
4. Redistribute content from Alman Partners (unless content is specifically made for redistribution).

## **Hyperlinking to our Content**

1. The following organizations may link to our website without prior written approval:
  - a. Government agencies;
  - b. Search engines;
  - c. News organizations;
  - d. Online directory distributors when they list us in the directory may link to our website in the same manner as they hyperlink to the websites of other listed businesses; and
  - e. Systemwide Accredited Businesses except soliciting non-profit organizations, charity shopping malls, and charity fundraising groups which may not hyperlink to our website.
2. These organizations may link to our home page, to publications or to other website information so long as the link:
  - a. is not in any way misleading;
  - b. does not falsely imply sponsorship, endorsement or approval of the linking party and its products or services; and
  - c. fits within the context of the linking party's site.
3. We may consider and approve in our sole discretion other link requests from the following types of organizations:
  - a. commonly known consumer and/or business information sources such as Chambers of Commerce or Industry/Professional Networks;

- b. dot.com community sites;
- c. associations or other groups representing charities, including charity giving sites;
- d. online directory distributors;
- e. internet portals;
- f. accounting, law and consulting firms whose primary clients are businesses; and
- g. educational institutions and trade associations.

We will approve link requests from these organizations if we determine that:

1. the link would not reflect unfavourably on us or our accredited businesses (for example, trade associations or other organizations representing inherently suspect types of business, such as work-at-home opportunities, shall not be allowed to link;
2. the organization does not have an unsatisfactory record with us;
3. the benefit to us from the visibility associated with the hyperlink outweighs the absence of link is in the context of general resource information or is otherwise consistent with editorial content in a newsletter or similar product furthering the mission of the organization.

These organizations may link to our home page, to publications or to other website information so long as the link:

1. is not in any way misleading;
2. does not falsely imply sponsorship, endorsement or approval of the linking party and its products or services; and
3. fits within the context of the linking party's site.

If you are among the organizations listed in paragraph 2 above and are interested in linking to our website, you must notify us by sending an e-mail to [office@alman.com.au](mailto:office@alman.com.au). Please include your name, your organization name, contact information (such as a phone number and/or e-mail address) as well as the URL of your site, a list of any URLs from which you intend to link to our website, and a list of the URL(s) on our site to which you would like to link. Allow 2-3 weeks for a response.

Approved organizations may hyperlink to our website as follows:

1. By use of our corporate name; or

2. By use of the uniform resource locator (web address) being linked to; or
3. By use of any other description of our website or material being linked to that makes sense within the context and format of content on the linking party's site.

No use of Alman Partners' logo or other artwork will be allowed for linking absent a trademark license agreement.

### *Iframes*

Without prior approval and express written permission, you may not create frames around our webpages or use other techniques that alter in any way the visual presentation or appearance of our website.

### *Reservation of Rights*

We reserve the right at any time and in its sole discretion to request that you remove all links or any particular link to our website. You agree to immediately remove all links to our website upon such request. We also reserve the right to amend these Terms and Conditions and its linking policy at any time. By continuing to link to our website, you agree to be bound to and abide by these linking Terms and Conditions.

### *Content Liability*

We shall have no responsibility or liability for any content appearing on your website. You agree to indemnify and defend us against all claims arising out of or based upon your website. No link(s) may appear on any page on your website or within any context containing content or materials that may be interpreted as libellous, obscene or criminal, or which infringes, otherwise violates, or advocates the infringement or other violation of, any third party rights.

### *Removal of links from our website*

If you find any link on our website or any linked website objectionable for any reason, you may contact us about this. We will consider requests to remove links but will have no obligation to do so or to respond directly to you.

Whilst we endeavour to ensure that the information on this website is correct, we do not warrant its completeness or accuracy; nor do we commit to ensuring that the website remains available or that the material on the website is kept up to date.

## **Disclaimer**

To the maximum extent permitted by applicable law, we exclude all representations, warranties and conditions relating to our website and the use of this website (including, without limitation, any warranties implied by law in respect of satisfactory quality, fitness for purpose and/or the use of reasonable care and skill). Nothing in this disclaimer will:

1. limit or exclude our or your liability for death or personal injury resulting from negligence;
2. limit or exclude our or your liability for fraud or fraudulent misrepresentation;
3. limit any of our or your liabilities in any way that is not permitted under applicable law; or
4. exclude any of our or your liabilities that may not be excluded under applicable law.

The limitations and exclusions of liability set out in this Section and elsewhere in this disclaimer:

- a. are subject to the preceding paragraph; and
- b. govern all liabilities arising under the disclaimer or in relation to the subject matter of this disclaimer, including liabilities arising in contract, in tort (including negligence) and for breach of statutory duty.

To the extent that the website and the information and services on the website are provided free of charge, we will not be liable for any loss or damage of any nature.

If you have any queries regarding any of our Terms & Conditions, please contact us.

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## **ONLINE PRIVACY POLICY**

**Your privacy is critically important to us.**

Alman Partners is located at:

*8 Brisbane Street, Mackay QLD 4740; and*

*Level 6, 307 Queen Street, Brisbane City Qld 4000*

It is Alman Partners' policy to respect your privacy regarding any information we may collect while operating our website. This Privacy Policy applies to <https://www.alman.com.au/> (hereinafter, "us", "we", or "<https://www.alman.com.au/>"). We respect your privacy and are committed to protecting personally identifiable information you may provide us through the website. We have adopted this privacy policy ("Privacy Policy") to explain what information may be collected on our website, how we use this information, and under what circumstances we may disclose the information to third parties. This Privacy Policy applies only to information we collect through the website and does not apply to our collection of information from other sources.

This Privacy Policy, together with the Terms & Conditions posted on our website, set forth the general rules and policies governing your use of our website. Depending on your activities when visiting our website, you may be required to agree to additional Terms & Conditions.

### **Website Visitors**

Like most website operators, Alman Partners collects non-personally identifying information of the sort that web browsers and servers typically make available, such as the browser type, language preference, referring site, and the date and time of each visitor request. Alman Partners' purpose in collecting non-personally identifying information is to better understand how Alman Partners' visitors use its website. From time to time, Alman Partners may release non-personally identifying information in the aggregate, e.g., by publishing a report on trends in the usage of its website.

Alman Partners also collects potentially personally identifying information like Internet Protocol (IP) addresses for logged in users and for users leaving comments on <https://www.alman.com.au/> blog posts. Alman Partners only discloses logged in user

and commenter IP addresses under the same circumstances that it uses and discloses personally identifying information as described below.

### **Gathering of Personally Identifying Information**

Certain visitors to Alman Partners' website choose to interact with Alman Partners in ways that require Alman Partners to gather personally identifying information. The amount and type of information that Alman Partners gathers depends on the nature of the interaction. For example, we ask visitors who sign up for a blog at <https://www.alman.com.au/> to provide a contact name and email address.

### **Security**

The security of your Personal Information is important to us but remember that no method of transmission over the internet, or method of electronic storage is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

### **Advertisements**

Ads appearing on our website may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by Alman Partners and does not cover the use of cookies by any advertisers.

### **Links to External Sites**

Our website may contain links to external sites that are not operated by us. If you click on a third-party link, you will be directed to that third-party's site. We strongly advise you to review the Privacy Policy and Terms & Conditions of every site you visit.

We have no control over and assume no responsibility for the content, privacy policies or practices of any third-party sites, products or services.



## **Google AdWords**

<https://www.alman.com.au/> uses remarketing services to advertise on third-party websites (including Google) to previous visitors to our site. It could mean that we advertise to previous visitors who haven't completed a task on our site, for example using the contact form to make an enquiry. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. Third-party vendors, including Google, use cookies to serve ads based on someone's past visits. Of course, any data collected will be used in accordance with our own privacy policy and Google's privacy policy.

You can set preferences for how Google advertises to you using the Google Ad Preferences page, and if you want to, you can opt-out of interest-based advertising entirely by cookie settings or permanently using a browser plugin.

## **MailChimp**

Alman Partners utilise MailChimp as an email marketing platform for communications such as, but not limited to, blogs and newsletters. Names and email addresses are provided to MailChimp in its role as an email marketing service provider and said personal information is protected under MailChimp's own Privacy Policy found [here](#). Email campaign interaction is collected, including open rate, page clicks, device and connection information.

## **Social Media**

If you access our goods or services by connecting a social media login (such as Facebook or Google) we collect information derived, associated or connected with that platform where permitted by the platform's terms of service. Any information we collect from social media, or other online platforms, is collected in accordance with that platform's terms and conditions.

## **Aggregated Statistics**

Alman Partners may collect statistics about the behaviour of visitors to its website and may display this information publicly or provide it to others. However, Alman Partners does not disclose your personally identifying information.

## **Affiliate Disclosure**

This site does not use affiliate links and therefore Alman Partners do not earn any commissions from such links.

## **Cookies**

To enrich and perfect your online experience, Alman Partners uses “cookies” or similar technologies and services provided by others to display personalized content, appropriate advertising, and store your preferences on your computer. A cookie is a string of information that a website stores on a visitor’s computer, and that the visitor’s browser provides to the website each time the visitor returns. Alman Partners uses cookies to help Alman Partners identify and track visitors, their usage of <https://www.alman.com.au/>, and their website access preferences. Alman Partners visitors who do not wish to have cookies placed on their computers should set their browsers to refuse cookies before using Alman Partners’ websites, with the drawback that certain features of Alman Partners’ websites may not function properly without the aid of cookies. By continuing to navigate our website without changing your cookie settings, you hereby acknowledge and agree to Alman Partners’ use of cookies.

Our website collects the following information from users:

- your server address;
- your top-level domain name (for example, .com, .gov, .au etc);
- the date and time of your visit to the site;
- the pages you accessed;
- the previous site you have visited; and
- the type of browser you are using.

## **Privacy Policy Changes**

Although most changes are likely to be minor, Alman Partners may change its Privacy Policy from time to time, and in Alman Partners' sole discretion. Alman Partners encourages visitors to frequently check this page for any changes to its Privacy Policy. Your continued use of this site after any change in this Privacy Policy will constitute your acceptance of such change.

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## **PERSONAL FINANCIAL PROFILE: PRIVACY ACT**

Alman Partners Pty Ltd is bound by the Australian Privacy Principles (APP). Information you provide to us assists in the construction of a valuable first appointment with an Adviser.

Alman Partners Pty Ltd will only disclose your personal information for a purpose related to the services you are procuring from us. Where we use an external third party in the course of providing our services to you, we will provide your personal information to that external service provider for the exclusive purpose of assisting us to provide services to you. We use external service providers to assist us in providing advice.

Alman Partners Pty Ltd may collect client personal information when purchasing other financial advisory businesses.

## **CONTACT US**

If you wish to:

- gain access to your personal information;
- make a complaint about a breach of your privacy;
- contact us with a query about how your information is collected or used;
- not receive direct marketing from us; or
- contact us regarding any other matter concerning these Policies,

you can speak directly with our staff who will do their best to try to resolve your issue as simply as possible. Alternatively, you can write to us or send us an email so that our Privacy Officer can consider the matter. We will respond to you as soon as reasonably possible.

The Privacy Officer

Alman Partners

PO Box 1699,

Mackay, QLD 4740

Phone +61 7 4957 2572