

## ElkCorp, Elkcorp, ElkCorp House, Elk Service Centre, Elk Financier, Elk Advisory, Elk Invest, Elk Numbers & Strategy, Elk Realty & Elk Capital Privacy Policy

### Introduction

The privacy of your personal information is important to us. Our privacy policy governs how we collect and use your personal information. This privacy policy sets out how we respect your rights to privacy in accordance with the National Privacy Principles contained in the Privacy Act 1988 (Commonwealth).

### How we collect personal information

We may collect personal information from you during the completion of the / our Client Needs Analysis & Fact Find, during our face to face or telephone (including remote digitally delivered) appointments we complete with you, and further to this as part of the matters and / or services that you have requested that we investigate and / or provide to you. Information may be disclosed by ElkCorp and / or Elkcorp and / or Elk Service Centre and / or Elk Financier and / or Elk Advisory and / or Elk Invest and / or Elk Numbers & Strategy and / or Elk Realty & Capital only to organisations / individuals that require such information in order to allow for details of product and service options to be provided to you. In addition, information may be provided to credit providers / funders and / or product manufacturers in order to action and implement the finance proposals (including Credit Advice Proposals) and / or applications, and / or advice recommendations (including as document in a Statement of Advice or Record of Advice), that you have requested we investigate and / or implement / establish for you. Further to this, information may also be provided to third party entities that may have initially provided your details to us, or that may have initially referred you to us.

### Use of your personal information

We will use your personal information:

1. In order to effectively conduct our business including providing such information to ElkCorp group entities and / or its Directors, staff, members or representatives, as well as to third party entities that may have initially provided your details to us, or that may have initially referred / introduced you to us.
2. During performing transactions on your behalf to which the provision of that personal information relates.
3. In order to provide information to third party organisations / individuals, so details regarding the products and services we provide access to, can be provided to you; and,
4. For internal administration and marketing purposes including providing such information to ElkCorp group entities and / or its Directors, staff, members or representatives, Elk Service Centre Pty Ltd as well as to third party entities that may have initially provided your details to us, or that may have initially referred / introduced you to us.
5. If you wish to cease receiving any communication from us (other than as required for the day –to-day operation of our business), please contact:

The Privacy Officer  
ElkCorp House  
P.O. Box 345  
Chevron Island QLD 4217

### Access rights to your personal information

You have the right to access any information allowable by law from ElkCorp, ElkCorp House, Elk Service Centre, Elk Financier, Elk Advisory, Elk Invest, Elk Numbers & Strategy, and Elk Realty & Capital that relates to you. In order to access this information, you may ask us to provide you with a list of personal information we hold, and copies of the information. We will endeavour to provide you within 30 days of receiving this request. If you believe any of the information we are holding about you is incorrect, you may ask us to correct it.

### Storage of your personal information

We take all reasonable steps to securely protect your personal information from loss, misuse, or unauthorised access. When your information is no longer required for our business, we will destroy it or permanently de-identify this information.

# Privacy Policy

## Your Privacy Protection

We will maintain a file which contains all the personal details and associated information (including source and supporting documentation) you have disclosed and that we have collected, including information included in the Client Needs Analysis & Fact Find. You can arrange to examine your personal file by simply contacting us to make the appropriate arrangements regarding this. We will also disclose to you (and provide for your review) a copy of a supplementary / additional Privacy Policy specifically relating to the information we capture and collate during the completion of our (including the other organisations / entities / businesses that form part of, and comprise, Elkcorp House Pty Ltd) Client Needs Analysis and Fact Find (this may be contained within the: Welcome to ElkCorp Documentation suite; ElkCorp Services Guide & Disclosure Statement; and / or Elkcorp Financial Services Guide).

## Our Commitment

At ElkCorp, the entities that form part of the ElkCorp and Elk7 group ("the Companies") – including the authorised representatives that represent such companies recognise that your privacy is important.

We are bound by, and committed to supporting, the National Privacy Principles (NPP) set out in the Privacy Amendment (Private Sector) Act 2001. The information set out below is largely a summary of our obligations under the NPP.

## Use and Disclosure

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 comprehensive financial advice and services is dependent on us obtaining certain personal information about you, which may include:

Name and address;  
Employment details and employment history;  
Phone numbers, email address and personal address and / or PO Box address;  
Career history;  
Credit Card details (including for credit card payments);  
Banking details; and  
Statement of financial position (including details of your current superannuation accounts and balances)  
We will destroy or de-identify your personal information when it is no longer required.

## Access and Correction

You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in-house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result.

We reserve the right to charge a fee for searching for and providing access to your personal information. In the event we refuse you 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 that we hold is up to date and accurate. The accuracy of the personal information is dependant to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

## **Privacy Complaints**

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us by any of the methods contained in this policy statement and request that your complaint be directed to the Privacy Officer.

Your complaint will be considered within seven days and responded to accordingly. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

## **Openness**

We may use and disclose personal information for the purposes for which it was provided or secondary purposes in circumstances where you would reasonably expect such use or disclosure.

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. You may, by contacting us by any of the methods detailed in this policy statement, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned

## **Collection**

Our main purposes for collecting personal information are to facilitate the services that ElkCorp provide or that you have agreed / requested. .

At or before the time we collect personal information from you we will take reasonable steps to inform you why we are collecting that personal information, who else we might disclose that personal information to and what may happen if you do not provide personal information to us.

## **Data Security**

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure.

We will not retain any of your information for any longer than it is required by us, except to satisfy statutory requirements of the Act.

We may disclose personal information to third parties or external contractors carrying out functions and duties for and on behalf of the Companies (or entities that form part of, or comprise GKF Partners). It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy.

The information we collect from you may also be disclosed to third parties if the disclosure is required by or permitted by law.

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 used or disclosed by them. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer

## **Identifiers**

In some circumstances we are required to collect identifiers. We will not use or disclose this information other than when required to do so by law or, or when consented to by you

## **Anonymity**

You may deal with us anonymously where it is lawful, practicable and reasonable to do so.

### **Sensitive Information**

Without your consent, we will not collect sensitive information about you. Exceptions to this include where the information is required by law, and / or the provision of service you have requested and / or require, or for the establishment, exercise or defence of a legal claim.

### **How we respect your Privacy**

Any information you give us may be used for providing product and service options to you via the different entities, representatives and service providers across and within the ElkCorp, Elkcorp, and elk7 business model and group of entities. Such information will be shared and utilised within the group and these entities for the purposes of providing such product and services to you. We may use this information for other purposes, such as administration and marketing.

We may disclose personal and financial information to other / third party companies. We will do this only where we are allowed or required to do so by law, or where you have consented. If you want to access your personal information, you can write to, or call us. Our Privacy Policy explains in more detail our commitment to protecting your personal information.