Ascendancy Planning
FINANCIAL PLANNING & ADVICE

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DOCUMENTS AND DISCLOSURES

Privacy Policy

How Ascendancy Planning collects, uses, shares and protects personal information.

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1 About this policy

This policy explains how Ascendancy Planning Pty Ltd ("we", "us") handles personal information under the Privacy Act 1988 (Cth) and the Australian Privacy Principles. Personal information is information about an identified individual, or an individual who is reasonably identifiable.

We provide financial advice as a corporate authorised representative of Bluewater Financial Advisors Pty Ltd (AFSL 411846). Bluewater has its own privacy policy, which applies to the information it handles as our licensee.

This policy covers clients, prospective clients, people whose details we receive in the course of our work (such as family members, beneficiaries and fellow trustees), and people who enquire about our services.

If you have a question about privacy, contact our Privacy Officer at privacy@ascendancyplanning.com.au or on 1300 317 437.

2 What we collect

To give you advice that is appropriate to you, we may collect:

- **Identity and contact details:** name, date of birth, addresses, phone numbers, email addresses, and identity document details.
- **Financial information:** income, expenses, assets, liabilities, superannuation, investments, insurance, tax file numbers, and bank details.
- **Personal circumstances:** family, dependants, employment, estate planning arrangements, goals and attitude to risk.
- **Verification information:** the results of identity checks and the records of how they were done.
- **Communications:** emails, messages, file notes, and recordings or transcripts of calls and meetings (see section 10).
- **Website information:** technical information about how you use our website (see section 11).

For insurance advice, we may need **health and lifestyle information**, which is sensitive information. We collect sensitive information only with your consent, or where the law requires or permits it.

3 How we collect it

We collect most information directly from you, through fact-finds, forms, documents, emails, calls and meetings.

We also collect information from others, with your authority or where the law allows, including:

- super funds, insurers, platforms and other financial product providers;
- your accountant, solicitor or other professional advisers;
- government and public registers;
- identity verification services.

When we collect information about you from someone else, we take reasonable steps to make you aware of it, unless the law tells us otherwise.

If you give us information about another person, such as a partner or beneficiary, please let them know and point them to this policy.

4 Why we collect and use it

We collect, use and disclose personal information to:

- understand your circumstances and give you personal advice that is in your best interests;
- implement our advice, for example by applying for, changing or closing financial products on your instructions;
- provide ongoing reviews and services you have agreed to;
- meet our legal obligations, including under the Corporations Act 2001 (Cth), the Privacy Act and anti-money laundering law, and keep the records the law requires;
- allow our licensee to supervise and monitor our advice;
- handle complaints and claims;
- communicate with you about your advice and our services;
- run our business, including quality review, training and insurance.

We use it for another purpose only with your consent, or where the law requires or permits it.

If you choose not to give us information we ask for, our advice may not be appropriate for you, and we will tell you if that is the case.

5 Tax file numbers

We collect tax file numbers only where needed to give your super fund or another product provider the information they require, and we handle them under the Privacy (Tax File Number) Rule 2015. Quoting a tax file number is not compulsory, but not quoting it may mean more tax is withheld or some contributions cannot be accepted.

6 Identity checks and anti-money laundering law

We verify your identity before we provide some services. Ascendancy Planning is covered by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) for the services we provide, and we follow our licensee Bluewater's anti-money laundering program. This means we collect and verify information about you and people connected with you, such as beneficial owners, keep records of those checks for at least seven years, and certain matters may be reported to AUSTRAC. We may use an electronic verification service. If a check involves a credit reporting body, we ask for your consent first and offer you another way to verify your identity. The law may prevent us from telling you about a report we make.

7 Who we share information with

We do not sell personal information.

Our licensee. We share information with Bluewater Financial Advisors as needed for it to supervise and monitor our advice, audit our files, and handle complaints.

Financial product providers. We share information with super funds, insurers, platforms and other product providers to implement our advice on your instructions, and with insurers to support applications and claims.

Our team and service providers. Our team includes staff, and may include contractors and providers who support our advice process, such as paraplanning and administration. We also use service providers such as financial planning software, document, email and meeting systems, and identity verification and e-signature services. They receive personal information only to the extent they need it for our services. We require them to keep it confidential and to handle it in line with Australian privacy law.

Our group. We are part of a group of companies that includes Ascendancy Group Pty Ltd, trading as Strategic Super. We share information within the group only as needed to deliver services you have engaged us for or enquired about, or with your consent. We do not share it within the group for marketing. We ask for your express consent before referring you to another business, within or outside our group.

Your professional advisers. With your authority, we share information with your accountant, solicitor or other professionals.

Regulators, dispute resolution and the law. We disclose information where the law requires or permits it, including to ASIC, the ATO, AUSTRAC, the Office of the Australian Information Commissioner, courts and tribunals, and to the Australian Financial Complaints Authority if you make a complaint to it.

8 Overseas

Some of our team and service providers are outside Australia. Personal information may be accessed from, stored in or processed in countries that may include the United States, New Zealand, Indonesia and the Philippines. From time to time, other countries where our providers operate may also be involved.

Before information goes overseas, we take reasonable steps, including contractual terms, to ensure it is handled consistently with the Australian Privacy Principles. We remain accountable for it as the Privacy Act requires.

9 Artificial intelligence and decisions made by computer programs

Artificial intelligence. Our people use AI tools, including AI features built into business software, to help draft, organise, research and check work. Some of these tools process information outside Australia. Your adviser is responsible for the advice you receive and reviews AI-assisted work

before relying on it. We take reasonable steps to prevent your information being used to train AI models. Our AI Policy explains more.

Decisions made by computer programs. While we use automated systems and computer programs, including artificial intelligence (AI), in our work, we do not delegate decisions about your advice to these systems. Your adviser exercises professional judgement and remains responsible for the advice and recommendations we provide.

We use these tools to review and query documents and client conversation transcripts, prepare draft documents, and generate financial projections, simulations and scenarios. Our personnel review relevant outputs before relying on them.

These activities may involve processing your personal information, including health information where relevant and with your consent or as otherwise permitted by law. We use third-party technology providers, and some processing may occur overseas, as described elsewhere in this policy.

10 Calls and meetings

We may record or transcribe calls and video meetings, sometimes using AI tools, to keep accurate records of our advice and for quality. We tell you at the start when this is happening, and you can ask us not to record. Recordings and transcripts may be stored by our providers outside Australia. Where they form part of our advice records, we keep them for as long as the law requires.

11 Our website and forms

Our website uses Google Analytics to understand how it is used. Analytics cookies are set only if you accept them. You can change your analytics choice at any time using Cookie settings in the website footer. If you clear this website's stored data in your browser, the notice will appear again on your next visit. Google may process this information in the United States and other countries.

Our forms use Cloudflare Turnstile to keep out spam and automated abuse. It processes technical information such as your IP address and browser details, which may be handled outside Australia.

12 Updates from us

We may send clients and people who have asked for them our Notes and other updates. Every email includes a way to unsubscribe, and we act on unsubscribe requests promptly.

13 How we protect information

We use technical and organisational measures to protect personal information from misuse, interference, loss, and unauthorised access, change or disclosure. Access is limited to the people who need it for their work.

14 How long we keep it

We keep records of personal advice, and the information it relied on, for at least seven years, as the law requires, and other information for as long as we need it or the law requires. When we no longer need it, we take reasonable steps to destroy or de-identify it.

15 Access and correction

You can ask for access to the personal information we hold about you, and ask us to correct it. We generally respond within 30 days. Asking is free. If giving you access involves significant cost, we may charge a reasonable amount, and we will tell you first. If we refuse a request, we tell you why, unless the law prevents us from doing so, and how to complain.

16 Data breaches

If a data breach occurs, we assess it promptly. If it is an eligible data breach under the Notifiable Data Breaches scheme, we notify the people affected and the Office of the Australian Information Commissioner as the law requires.

17 Privacy complaints

If you are concerned about how we have handled your personal information, contact our Privacy Officer using the details in section 1, or follow our complaints process. We acknowledge your complaint within one business day and respond within 30 days.

If you are not satisfied with our response, you can complain to the Australian Financial Complaints Authority at afca.org.au (1800 931 678), or to the Office of the Australian Information Commissioner at oaic.gov.au (1300 363 992).

18 Changes to this policy

We may update this policy as our services, our systems and the law change. The current version and its date are always available at ascendancyplanning.com.au/privacy. If a change is material, we tell clients by email.

19 Contact

Privacy Officer, Ascendancy Planning Pty Ltd · PO Box 584, Upper Coomera QLD 4209 · privacy@ascendancyplanning.com.au · 1300 317 437

Careful advice, clear next steps.

Questions about this policy? Call us on 1300 317 437, or contact us at ascendancyplanning.com.au/contact.