



## JSA Group Privacy Policy

Your privacy is important to us. This Privacy Policy outlines how the JSA Group (JSA) manages the personal information we hold about you, our client. Privacy laws apply to how we collect, maintain, use and disclose your personal information.

It is the JSA's policy to respect the confidentiality of information and the privacy of individuals. JSA is bound by the Privacy Act 1988 including the Australian Privacy Principles.

JSA's Privacy Policy will be reviewed from time to time to take into account new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current JSA Privacy Policy.

### Organisations To Which This Policy Applies

We are permitted by the Privacy Act to disclose personal information (other than sensitive information) to the following entities:

- |                                     |                    |
|-------------------------------------|--------------------|
| • JSA Financial Planning Group      | ABN 27 001 854 397 |
| • JSA Financial Services Pty Ltd    | ABN 34 084 953 177 |
| • JSA Mortgages and Finance Pty Ltd | ABN 25 132 359 990 |
| • JSA Accounting & Tax Pty Ltd      | ABN 66 136 025 397 |
| • JSA Salary Packaging Pty Ltd      | ABN 81 147 974 623 |
| • Emjay Insurance Brokers Pty Ltd   | ABN 52 002 815 910 |

Where you have been referred to JSA via one of our Joint Ventures or a Referral Partner, we may be required to disclose personal information to them when permitted or required by law or with your consent.

### JSA Group's Privacy Policy is Based on Openness

We are committed to being open about how we use personal information. Your personal information will be collected and held by Authorised Representatives, Staff and related bodies corporate of JSA Group.

### Why Does JSA Group Collect Personal Information?

Our business is to understand and meet our clients' needs over their lifetime for a wide range of financial and other services. To do this effectively, we need to collect certain personal information. We will only collect personal information as reasonably necessary for this purpose. In most cases, your personal information will be collected when you meet with your JSA Adviser, Accountant or Consultant or you provide your information to us via telephone or electronic and written material. In some instances, your information may also need to be collected from third parties such as your employer if you are a member of a corporate superannuation plan, accountant, mortgage broker or solicitor.

Our JSA Financial Planning Advisers provide financial and loan products and services under the Matrix licence. They include (but are not limited to):

- Life insurance products protecting against risks
- Investment products to build wealth
- Superannuation and retirement income products to provide for retirement

- Banking and deposit products as part of the financial planning advice
- Financial planning advice, lending service or advice and other services to help individuals understand their financial needs and make financial and investment decisions

Collecting personal information also allows us to meet Australian or international legal or regulatory obligations that we, or product providers, might have.

### **What Kind of Personal Information Do We Hold?**

Because of the nature of the products and services provided, government regulations and the impact of Australian or International legal or regulatory obligations and taxation laws on us, or on the providers of products and services to our clients, we ask for a range of personal information.

The type of personal information we may collect can include (but is not limited to) name, address, date of birth, contact details, employment details and any other information we consider necessary provided by you or by others nominated by you. We may also collect and retain information regarding your education, credit history, professional background and experience and may potentially include sensitive information. For more details, see the section 'Sensitive Information Is Subject To Greater Restrictions' on Page 3.

In some instances, we may also collect information regarding your dependents and beneficiaries depending on the type of service and product we offer to you.

We obtain most of the information directly from you through applications or other forms, and from maintaining records of information provided in the course of financial planning advice, credit assistance, and customer service and for the purpose of conducting business with you.

If you choose not to provide the necessary information, we may not be able to provide you with the requested product or service.

### **How Do We Collect Your Information?**

We generally collect your personal information from you. However, we may collect the information with your consent from third parties where it is 'unreasonable or impracticable to collect from you' such as your accountant, a solicitor or your employer for superannuation purposes. We may also collect your information from publicly available sources or from third parties as required by law. If you are a minor (under 18 years of age) and you wish to obtain advice and services from Matrix, we may be required to obtain information from your legal guardian.

Where you have provided us with your contact details, personal information or requested our services via our websites, we may keep a record of your information.

### **How Do We Use This Information and Who May We Disclose It To?**

Unless you are informed otherwise, the personal information we hold is used for the Primary Purpose namely, the provision of financial planning, credit assistance, novated leasing and finance, accountancy and taxation advice and services and reviewing your ongoing needs. We may also use for personal information for secondary purposes such as enhancing customer service and product options, communicating with you regarding the products and services you have with us; handling your complaints; and giving you ongoing educational information, newsletters or opportunities that we believe may be relevant to your financial needs and circumstances.

We also use the personal information we collect about our clients to fulfil our legal or regulatory obligations or to assist providers of products and services to our clients to do so.

We will only disclose personal information to third parties for Primary Purpose, or when permitted or required by law, or with your consent. We will not release your information for any other purpose unless permitted by the Privacy law and with your consent. You may provide the consent in writing or via telephone.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Other areas within the JSA Group who provide financial and other services
- Financial planners, brokers and those who are authorised by JSA Group to review clients' needs and circumstances from time to time
- Service providers and specialist advisers to JSA Group who have been contracted to provide JSA Group with administrative, financial, insurance, accounting, legal, information technology, research, Paraplanning or other services
- Other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law
- Credit reporting or reference agencies or insurance investigators
- Organisations in connection with the sale or proposed sale of all or part of the JSA Group and/or other JSA business entities and to the use of that personal information by those organisations for those purposes
- AUSTRAC, the government agency who oversees Anti Money Laundering and Counter Terrorism. Before we arrange products or services we are required to validate client identity. We will request and copy some personal documents only for that purpose. Also we are required to provide details of certain transactions and entities where we hold reasonable suspicion of suspect matters.
- Product or service providers who have an obligation to disclose information to the Australian Taxation Office (ATO) where the ATO has agreements to share information with overseas tax authorities.
- Relevant external dispute resolution bodies who would handle your complaint.

Generally, we require that organisations outside JSA Group who handle or obtain personal information as service providers to JSA Group acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the privacy law.

#### **When Your Personal Information May Be Disclosed to Overseas Recipients**

In the course of providing you with Financial Services, we may engage in the services of organisations based overseas, or organisations based in Australia that utilise services themselves from overseas. Some of the organisations to which we may disclose your Personal Information may be located outside Australia, including New Zealand, USA (DropBox), India, Vietnam, Malaysia, Singapore, Thailand, Cambodia, Hong Kong and the Philippines. Where Personal Information is disclosed to these overseas locations, we expect these organisations to comply with this Policy and any relevant privacy laws and regulations applicable to their jurisdiction.

#### **Marketing Opt Out**

You can inform us if you do not wish to receive marketing materials from JSA. You can instruct your Adviser at the contact details provided on the last page of this document.

#### **Sensitive Information is Subject to Greater Restrictions**

Some personal information we hold is 'sensitive'. Sensitive information typically relates to a person's racial or ethnic origin, membership of political associations or trade unions, religious affiliations, sexual orientation or practices, criminal record, health information, medical and genetic history.

Sensitive information is usually needed for applications for personal insurance and to manage claims on those products. It may also be relevant to credit and other applications. It is JSA Group's policy that sensitive information will be used and disclosed only for the purposes for which it was provided, unless the customer agrees otherwise or the use or disclosure of this information is allowed by law. Documents asking for sensitive information will explain this and we will only collect sensitive information from you where reasonably necessary for us to provide a service to you and with your consent, or in limited other circumstances specified under privacy laws.

## **Management of Personal Information**

JSA Group trains its employees, financial planners, accountants, consultants and their staff who handle personal information to respect the confidentiality of customer information and the privacy of individuals. JSA Group regards breaches of your privacy very seriously and will impose appropriate penalties, including dismissal in some cases.

JSA Group has appointed a Privacy Officer to ensure that JSA Group's management of personal information is in accordance with this Privacy Policy and the Privacy Act.

## **How Do We Store Personal Information?**

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, mail, over the internet, or other electronic medium. We hold personal information in a combination of electronic and paper-based files and take steps to protect the personal information we hold from misuse, interference, loss, unauthorised access, modification or disclosure.

We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

## **You Have The Right To Check What Personal Information About You Is Held By Us**

Under the Privacy Act, you have the right to access any personal information which JSA Group holds about you and to advise JSA Group of any inaccuracy. The Act does set out some exceptions to this.

To make a request, you will need to submit your request in writing, verify your identity and specify what information you require.

We will respond to your request within 14 days. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing details and copying any material requested. If the information sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

## **Dealing with Breaches**

We consider breaches of your privacy to be very serious. If this happens, we will ensure that appropriate investigation occurs in a timely fashion, and where necessary, apply appropriate consequence management and/or remediation (including dismissal in some cases). We will be required to notify you and the Office of the Australian Information Commissioner (OAIC) if an 'eligible data breach' occurs in relation to your Personal Information that is held by us or another entity with whom we have shared your information. A data breach may occur if your Personal Information is lost or subjected to unauthorised access, modification, disclosure or other misuse or interference, and it is generally notifiable if there is a risk of 'serious harm' (for example, financial or reputational harm) to you due to the breach. This obligation extends to breaches that occur within Australia, and overseas.

We will also report any privacy breach as required under any other applicable laws.

## **Correction of Your Information**

JSA Group endeavours to ensure that your personal information is accurate and up-to-date. We realise that this information may change depending on your personal circumstances. You must notify us if there have been changes to your situation.

You may ask us to correct your information held by us which you believe is inaccurate or out of date. We will action your request in a timely manner.

## **What If You Have A Complaint?**

If you consider that any action of JSA Group breaches this Privacy Policy, the Australian Privacy Principles or otherwise fails to respect your privacy, you can make a complaint. Upon lodgement of a complaint with JSA, you will receive an acknowledgement of receipt and an indication of the timeframe in which JSA will respond to your complaint. We will try to resolve your complaint within 30 days. When this is not possible, we will inform you of the reasons for the delay.

To make a complaint, please forward it in writing to:

The Complaints Manager  
JSA Group  
PO Box 171  
CHARLESTOWN NSW 2290

If you are not satisfied with our response to your complaint, you can escalate the matter to the Office of the Australian Information Commissioner (OAIC) to complain about the way we have handled your personal information.

The OAIC can be contacted at:

Office of the Australian Information Commissioner  
GPO Box 5218, Sydney NSW 2001  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
Phone: 1300 363 992