



Privacy Policy

People you trust.
Advice that works.

Privacy Policy

The Sentry Group ("Sentry") regards Privacy as a pertinent issue and understands that it is important for you to know how we handle your personal information.

Privacy Laws apply to how we collect, hold, use and disclose your personal information. Sentry complies with its obligations under the Privacy Act 1988 and the associated Australian Privacy Principles ("APPs") and is committed to protecting the privacy of your personal information.

You can obtain further details of our obligations as an organisation under Australia's privacy laws from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner's associated guidelines at www.oaic.gov.au.

The following Privacy Policy has been published to provide you with an outline of the following:

- The types of personal information that we collect and keep on record;
- Why we collect, hold, use and disclose your personal information;
- How we collect your personal information;
- How you may access your personal information and correct it if necessary;
- How to raise your concerns to us in relation to our handling of your personal information; and
- If we are likely to disclose your personal information to overseas recipients.

Types of personal information that we collect, use and hold

There are two types of personal information that Sentry may collect, use and hold:

- Personal information – this is any information or opinion about you, whether the information or opinion is true or otherwise, and whether the information or opinion is recorded in a material form or otherwise. Usually, this is the information that identifies you, such as your name, address, contact details, gender information, occupation details and any other information that can identify you.
- Sensitive information – this is usually information about an individual's racial or ethnic origin, political opinions or membership, religious or philosophical beliefs, criminal record, health or genetic information.

Why we collect your personal information

Sentry collects and holds personal and sensitive information for the purposes of establishing and building a financial services, or credit services relationship with you. For example:

- In relation to financial services, Sentry will require your personal information to provide suitable financial advice; or

- In relation to credit services, Sentry will require your personal information to assist you in obtaining a loan.

In some cases, we provide personal information to our contractors, who provide us with services to assist us with conducting our business.

You do not have to provide to Sentry any of your personal information; however, if you choose not to provide the information or if you provide incomplete or inaccurate information, we may not be able to provide the services you are seeking.

How we collect your personal information

Personal information about you is generally collected directly from you, unless you have consented to us obtaining information from a third party, such as your accountant, spouse or superannuation fund.

However, there may be circumstances where it is not practical or reasonable for us to obtain your consent before collecting your personal information from a third party. For example, if you are nominated as a beneficiary of a life or superannuation policy or your information is obtained through publicly available information services, such as social media or telephone directory, Sentry will not obtain consent from you prior to collecting your information.

When you visit Sentry's or any of our representatives' web site we may collect information of a statistical nature such as the pages you viewed or the time online. This information is collected using cookies. Cookies do not identify individual users although they do identify a user's browser type and Internet Service Provider. You can configure your browser to accept all cookies, reject or notify when a cookie is sent. Please refer to your browser instructions for more details.

Where we collect information from you about another individual, such as your nominated beneficiary, it is important that you advise them of the disclosure and their Privacy rights.

Disclosure of your personal information

Generally, your consent is obtained before we disclose your personal information to a third party. Your consent can be in writing, by telephone, or implied by your conduct.

Depending on the type of service or product provided to you we may need to disclose your personal information to:

- Investment Managers, Insurance Companies or Financial Institutions;
- A third party acting on your behalf e.g. your nominated financial adviser, accountant, settlement agent, land seller or builder;
- External service providers that provide services to us or our representatives e.g. mailing houses, software suppliers and stationers.

In some instances, we may be required to disclose your personal information to external services providers who are

located overseas, including United States of America, Singapore, Malaysia and Vietnam.

In some circumstances however we may be required by Law to disclose your personal information.

It may also be necessary to disclose your personal information to a party acquiring an interest or shareholding in Sentry's or any of our representatives' business.

Access to personal information

You can request us at any time to provide you with access to the personal information we hold about you. Under some circumstances we may not be required to provide access to you and in such cases a written explanation will be given to you.

Access to your information will be provided on receipt of a written request and will generally be processed within 21 days. More time may be required for more complex requests. Your written request should be forwarded to our Privacy Officer at the address provided on this document.

There is no fee for requesting access to your information; however, we may charge you the reasonable costs of processing your request.

Personal information quality

We try to ensure that your personal information is accurate, complete and up-to-date. To assist us with this please keep us advised of any of your personal details which may have altered.

Further, if you believe that the information we have about you is not accurate, complete or up-to-date, please contact us and we will use all reasonable efforts to correct the information. If we disagree as to the accuracy of the requested correction we will make an appropriate notation in your records that you claim the information we hold is not accurate, complete or up-to-date.

Personal information security

We take all reasonable administrative, technical, and physical safeguards to protect your personal information from misuse, loss, unauthorised access, alteration or disclosure.

Your personal information may be stored on business servers or Cloud Storage, which can be located overseas.

Secure methods are used to destroy or de-identify any personal information, provided the information is no longer needed for any purpose and it is permissible by the law to do so.

Marketing and promotional material

We acknowledge and respect your right to choose to opt-out of receiving information about products and services supplied by us, or by others, which we think may be of interest to you.

Should you decide not to receive marketing or promotional material from us you can opt-out at any time by advising us in writing or contacting us by telephone.

Privacy policies of other parties

Many of the product and service providers you may deal with through your relationship with Sentry will also have Privacy Policies concerning the manner in which they collect, hold, use or disclose personal information. These Policies can generally be accessed via the provider's web site or will be made available to you upon request to them.

Changes to this statement

Sentry may make changes to our Privacy Policy from time to time. We will publish those changes on our web site www.sentrygroup.com.au.

Contacting us about privacy

If you would like further information regarding our Privacy Policy, or if you think we have breached any aspect of this Privacy Statement, please contact our Privacy Officer, by:

Telephone: 08 9267 3444 between 9.00am and 5.00pm (WA time) Monday to Friday

Email: compliance@sentrygroup.com.au

Post: PO Box 8196, Perth BC WA 6849.

Issued by

Sentry Group Pty Ltd, ABN 40 125 343 384.

Sentry Wealth Pty Ltd,
ABN 17 151 866 385 | AFSL 408800.

Sentry Credit Services Pty Ltd,
ABN 26 116 569 423 | Australian Credit Licence 390153.

Sentry Financial Planning Pty Ltd,
ABN 74 099 029 526 | AFSL 247105.

Sentry Financial Services Pty Ltd,
ABN 30 113 531 034 | AFSL 286786.

Sentry Advice Pty Ltd,
ABN 77 103 642 888 | AFSL 227748.

Wealthsure Financial Services, Pty Ltd,
ABN 59 130 288 578 | AFSL 326450.

Sentry Select Pty Ltd, ABN 99 603 020 499.

Jointly and severally referred to herein as "Sentry Group" or "Sentry".

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ALEXANDER BEARD

Privacy Policy

Like most industries today, the financial services industry is rapidly being shaped by technology, which is literally changing the way we do business. To be successful in this environment, we must continue to ensure that our customers are confident that we will manage their financial affairs expertly and confidentially. (AUSTRALIA) Pty Ltd. (“AB-AUS”) collects personal, private information from its clients in order to determine the client’s specific investment goals and objectives, which will assist in determining how to adequately service the client account based on the services provided by AB-AUS, as disclosed in AB-AUS’s Form ADV Part II.

The safeguarding of customer information is an issue we take seriously, and we want to assure all of our customers that whenever information is collected and used, it is done so with discretion. To affirm our continuing commitment to the proper use of customer information, we have set forth the following Privacy Policy, which is designed to guide us in serving the privacy needs of our customers.

Recognition of a Customer’s Expectation of Privacy: At AB-AUS, we believe the confidentiality and protection of customer information is one of our fundamental responsibilities. And while information is critical to providing quality services, we recognize that one of our most important assets is our customers’ trust. Thus, the safekeeping of customer information is a priority for AB-AUS.

Use, Collection and Retention of Customer Information: AB-AUS limits the use, collection, and retention of customer information to what we believe is necessary or useful to conduct our business, provide quality services, and offer products, services, and other opportunities that may be of interest to our customers. Information collected may include, but is not limited to: name, address, telephone number, tax identification number, driver’s license numbers, date of birth, employment status, annual income and net worth.

Maintenance of Accurate Information: AB-AUS recognizes that it must maintain accurate customer records. The above-referenced information is collected at the inception of your relationship with AB-AUS. Therefore, AB-AUS will contact you periodically to review your overall account holdings, and to ensure that personal/confidential information contained in your file is accurate. AB-AUS also requests that you review any information provided to you related to

your advisory account, and notify AB-AUS at info@abg.net promptly on the discovery of erroneous information. AB-AUS will respond to a comment/request to correct inaccurate information immediately.

Limiting Employee Access to Information: At AB-AUS, employee access to personally identifiable customer information is limited to those employees that have a business reason to know such information. Employees are educated on the importance of maintaining the confidentiality of customer information and on these Privacy Principles. Because of the importance of these issues, all AB-AUS employees are responsible for maintaining the confidentiality of customer information and employees who violate these Privacy Principles will be subject to disciplinary measures.

Protection of Information via Established Security Procedures: AB-AUS recognizes that a fundamental element of maintaining effective customer privacy procedures is to provide reasonable protection against unauthorized access to customer information. Therefore, AB-AUS has established appropriate standards and procedures to guard against any unauthorized access to customer information.

Restrictions on the Disclosure of Customer Information: When it comes to sharing customer information with unaffiliated companies, AB-AUS places strict limits on who receives specific information about customer accounts and other personally identifiable data. AB-AUS may share information with such companies if they provide a product or service that may benefit our customers. Whenever we do this, we carefully review the company and the product or service to make sure that it provides value to our customers. We share the minimum amount of information necessary for that company to offer its product or service. We may also share information with unaffiliated companies that assist us in providing our products and services to our customers; in the normal course of our business (for examples, with broker-dealers, consumer reporting agencies and government agencies); when legally required or permitted in connection with fraud investigations and litigation; in connection with acquisitions and sales; and at the request or with the permission of a customer.

Maintaining Customer Privacy in Business Relationships with Third Parties: If we provide personally identifiable customer information to a third party with which we have a business relationship, we will insist that the third party keep such information confidential, consistent with the conduct of our business relationship.

Disclosure of Privacy Principles to Customers: AB-AUS recognizes and respects the privacy expectations of our customers. We want our customers to understand our commitment to privacy in our use of customer information. As a result of our commitment, we have developed these Privacy Principles which are made readily available to our customers. Customers who have questions about these Privacy Principles or have a question about the privacy of their customer information should contact Dave Stone info@abg.net

These Privacy Principles apply to individuals, and we reserve the right to change these Privacy Principles, and any of the policies or procedures described above, at any time. Under such circumstances, we will provide you with an updated set of policies and will provide adequate time for you to opt out of any information sharing arrangement.

These Privacy Principles are for general guidance and do not constitute a contract or create legal rights and do not modify or amend any agreements we have with our customers.

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