

Scarlett Wealth Pty Ltd (Scarlett Wealth) is the Trustee for Scarlett Wealth Unit Trust. At Scarlett Wealth, we are committed to protecting your privacy in accordance with and in compliance with the Privacy Act 1998 (Cth) and the Australian Privacy Principles (APP). Scarlett Wealth, its officers, Representatives and employees are required to obtain and hold information which personally identifies the persons with whom they transact. This document describes our current policies and practices in relation to the handling and use of personal information.

## **What information do we collect and how do we use it?**

When we advise you about your financial affairs, we ask you for the information we need to understand your financial situation, needs and objectives over the phone, through our website, face to face or by an application form. Information we request may include but are not limited to contact details, Information about your assets, liabilities, income, insurance and investments. We may also collect 'sensitive information' from time to time but only to help us provide our service to you. We will disclose any information that the fund managers or insurers whom we deal with on your behalf need to implement your investment and insurance strategies. We also use your information to send you requested product information and promotional material and to enable us to manage your ongoing requirements, e.g. further investments, and our relationship with you such as invoicing, client surveys etc. We may occasionally notify you about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post on investment and insurance matters. If you would rather not receive this information, email or write to us. We may use your information internally to help us improve our services and help resolve any problems. Though Scarlett Wealth operates throughout Australia, if your information is provided to an overseas supplier in the provision of advice, we will take reasonable steps to ensure that these service providers adhere to the APPs. In some circumstances, we may collect government identifiers such as your tax file number. We will not provide this information to external providers except as required by law or as is necessary to provide our financial service to you. You are permitted to decline the provision of this information but it may result in tax being withheld or have other consequences. You have the right to deal with us anonymously to the extent permitted by law and if it is practical to do so. If we receive unsolicited personal information, it will be destroyed and deidentified as soon as practicable, if it is lawful.

## **How do we hold and protect your information?**

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. We hold the information we collect from you in your client files and /or electronically for a period of 7 years. If you cease to be associated with us we will maintain your information in a secure manner for 7 years. After this time, your information will be securely destroyed. Your information will only be provided to authorised personnel who adopt and adhere to our Privacy

Policy. We will take reasonable steps to ensure that electronically held information will be password protected and hard copy information will be held in a locked cabinet or similar.

## **Will we disclose the information we collect to anyone?**

We do not sell, trade, or rent your personal information to others. We may need to provide your information including but not limited to our professional advisers, external dispute resolution schemes, platforms, accountants, regulators (ASIC, ATO, AUSTRAC, etc) and contractors who supply services to us, e.g. to handle mailings on our behalf or to other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event. However, we will do our best to ensure that they protect your information in the same way that we do. We may provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits. We may pass on your information to any of our Authorised Representatives in order to provide further financial services and products relevant to you.

## **What if you don't provide some information to us?**

We can only fully advise you if we have all relevant information. Providing complete and accurate information allows us to provide a service that is adequate and appropriate.

## **How can you check, update or change the information we are holding?**

You have a right to access or to seek correction of your personal information. Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate. If you wish to access or correct your personal information please contact our Privacy Officer. We do not charge for receiving a request for access to personal information or for complying with a correction request. If the provision of information incurs a charge you will be notified in writing prior to any information being provided. If Scarlett Wealth refuses access to information an explanation will be provided in writing.

## **Your consent**

By asking us to assist with your investment and insurance needs, you consent to the collection and use of the information you have provided to us for the purposes described above.

## **Tell us what you think**

We welcome your questions and comments about privacy. Any feedback will be read and considered by the Privacy Officer. Complaints should be made in writing to us and we will respond within 30 days. If you have any complaints, please contact:

Privacy Officer:

Scarlett Wealth Pty Ltd  
Level 1, 226 Leichhardt Street  
Spring Hill QLD 4000  
0418 734 855

[nathan.nash@scarlettfinancial.com.au](mailto:nathan.nash@scarlettfinancial.com.au)

If you are still not satisfied with the response received from us, you may escalate the complaint to the Office of the Australian Information Commissioner by submitting an online complaint at <https://forms.business.gov.au/smartforms>.