



Privacy Policy

Commitment Statement

Your Life Strategy Pty Limited and affiliates trading as Your Life Strategy (Your Life Strategy Pty Ltd) understand that your personal information is private, and we respect your privacy. This document outlines Your Life Strategy's policy on handling (collecting, storing, using, and disclosing) the personal information that Your Life Strategy collect about individuals including customers, potential customers, employees, and shareholders.

We respect the confidentiality of your information and take your privacy seriously, abiding by the Australian Privacy Principles contained in the Privacy Act 1988 (Cth) and this Privacy Policy. When we request personal information, we will normally explain why we need it, how it will be used and who we may share it with.

Information Collection and Use

Purpose

At Your Life Strategy, we are passionate about helping our clients achieve their dreams and goals. We do this by providing financial products and services. To do this effectively, it is crucial for us to completely understand your situation/individual circumstances; in this respect we need to collect certain personal information.

In this Privacy Policy, personal information is any information that identifies you as an individual or relates to an identifiable individual, including name, title, company name, job function, expertise, postal address, telephone number, or email address.

The types of financial products and services we provide include:

- Insurance products
- Investment products
- Superannuation and retirement income products
- Advice and administration services supporting self-managed superannuation funds
- Banking and other services (deposit and credit facilities)
- Financial planning advice and other services to help you understand your financial needs and make financial and investment decisions
- Management of investment assets such as shares, fixed interest, and cash.

Your Life Strategy's purpose for the collection, storage, use and disclosure of customers' personal information is for the effective completion of services and quality of products provided. Your information may also be used by or disclosed to third parties if they are assisting the providing of the services or products mentioned above.

In addition, some laws require us to collect personal information: the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Corporations Act 2001 (Cth), the National Consumer Credit Protection Act 2009 (Cth), and the U.S Foreign Account Tax Compliance Act.

Direct Marketing

We may also use and disclose your personal information to keep you informed about the range of financial products and services provided by Your Life Strategy.

You can opt out of receiving direct marketing information from us at any time (see the 'Contact Us' section below).

Not providing requested information

Providing information is your choice. However, if you don't, we may be unable to fulfil your request for a specific product or service and may not be able to identify you to protect you against fraud. Without certain information, we will also be unable to properly analyse your personal circumstances which will affect the quality of the services and/or products we provide you.

Data Collection

To assist us in providing you with relevant financial products and service, we may ask you for a range of personal information. The information we may request includes (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, health information, employment details, domicile, and citizenship status.

Sensitive information

Sensitive information includes information or an opinion relating to a person's racial or ethnic origin, political views or memberships, religious beliefs or affiliations, memberships of a professional or trade association or trade union, sexual orientation or practices and criminal record. It also includes information regarding an individual's health and medical history.

Sensitive information is sometimes collected and used for purposes such as when we consider a specific product or service (*i.e.*, insurances).

The Australian Privacy Principles set out restrictions about the way sensitive information can be used.

Unless we have your consent or are required or permitted by law, we will only use or disclose sensitive information for the purposes for which it was provided.

How we collect information

Your Life Strategy will collect your personal information directly from you where this is reasonable and practical. This information is gathered either through applications or other forms completed by you, or by recording information you provide via phone calls, interviews and other forms of communication.

We may also collect personal information from external sources. Examples of the people or organisation who may provide us with information are:

- Employers, when a new employee joins their superannuation or insurance plan
- Parents or guardians in respect of children
- People authorised by you (such as lawyers or accountants)
- Other credit providers
- Public sources of information (such as telephone directories)
- Market research organisations (through surveys or telephone polls)
- Third-party brokers (such as insurance and mortgage brokers)
- Credit reporting bodies

When we are provided with personal information about an individual from a third party, we seek to ensure the individual is aware of certain matters, such as Your Life Strategy's identity and contact details.

Anonymity and Pseudonym use

If you wish to remain anonymous or use a pseudonym when dealing with us, we may be able to provide you with limited information or services, such as general details about our products. However, due to lack of information and security of your identity, we will be unable to provide you with the full extent of our services and products; we are generally not permitted to issue a financial product to a person without first collecting their personal information and we will not be able to provide personalised advice.

Using government identifiers

If we collect government identifiers, such as your tax file number, we do not use or disclose this information other than required by law. We will never use a government identifier in order to identify you.

Information Protection

Regardless of data collection method used, Your Life Strategy has systems in place to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files, and other formats.

We have a number of procedures in place to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

Information Sharing

On occasion, your personal information may be shared with other entities both within and outside of Your Life Strategy. These entities vary according to the product or service involved, but could include:

- Other areas and organisations within Your Life Strategy that provide financial or other services.
- Financial planners, brokers and other parties authorised or accredited by Your Life Strategy/You First Strategy.
- Service provider and specialist advisers we engage to provide us with services such as administrative, financial, insurance or research services, some of whom may contact you on our behalf.
- Other insurers, including reinsurance companies, and credit providers.
- Courts, tribunals, and other dispute resolution bodies in the course of a dispute.
- Credit reporting or reference agencies or insurance investigators.
- Employers contributing to or otherwise participating in our superannuation or insurance plans.
- Policy committees in our superannuation plans.
- Anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf.
- Anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service).
- Other financial services institutions – to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

Information disclosure with Overseas Recipients

While some of the entities we share information with may be located in, or have operations in, other countries, and currently have no overseas operations or business partners, we do use Google Drive as a backup for our computer records, their servers are based in US, Ireland, Chile, Netherlands, Denmark, Finland, Belgium, Taiwan, Japan, and Singapore.

We normally require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles.

Please also note that personal information collected by one part of the 'You First' group of companies may be shared with other companies in this group for reasonable business purposes.

Updating personal information

We realise that your personal information changes frequently – people move house, change jobs and update other personal circumstances on an ongoing basis. In most cases you can alter your details over the telephone or via our online client portal.

If we believe that the information, we hold is incomplete or out of date, we may also seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

Time Length of Storage

We may be legally required to maintain some of your records for a significant period. However, once we believe information is no longer needed, we may remove any identifying details or destroy the records entirely.

Information Security

Your Life Strategy considers the security of your information as highly important, but no method of internet transmission or electronic storage is completely secure.

We strive to use commercially acceptable means to protect your personal info, however, cannot guarantee absolute security.

How to Contact us regarding Information Collection and Use

See the 'Contact Us' section below.

If you have a complaint

To raise any concerns which you may have in relation to privacy, please contact us via the contact channels listed in the 'Contact Us' section below. We may then refer a complaint to a specific business area within Your Life Strategy and a representative may respond to your concerns.

As we take your privacy seriously and consider all complaints carefully as part of our commitment to being open, honest, and fair in dealing with your concerns, we will generally contact you within five working days of receiving the complaint.

Escalating your concerns

If you feel your complaint has not been addressed satisfactorily by Your Life Strategy, or that it is taking too long to resolve, you can contact the Your Life Strategy Compliance Officer. Contact details are as follows:

By email – cgrimmer@youfirst.com.au

In Writing – The Compliance Officer

16 Marana Street

Shailer Park QLD 4128

If you still have concerns further assistance may be available from:

The Australian Financial Complaints Authority (AFCA)

Phone: 1800 931 678

Website: www.afca.org.au

Email: info@afca.org.au

Privacy and the Internet

This section outlines privacy issues specific to the youfirst.com.au website and emails you may receive from Your Life Strategy.

Interactive tools

The Your Life Strategy client portal provides you with many interactive tools designed to help you make informed financial and other decisions. Some of these tools include budget planners, repayment and other calculators, a superannuation simulator, and a financial health check.

Your Life Strategy may collect personal information you enter when using the interactive tools on our website.

Cookies

Cookies are a website standard feature that allows us to store small amounts of data on your computer about your visit to our website. They enable us to learn which areas of the website are useful or need improvement.

You are able to choose whether to accept cookies or not by changing the settings on your browser. However, if the cookie function is disabled, some portions of the website may not function as intended and your experience on the site may be diminished.

Instructions on how to manage your cookie setting can be found in the following link: <http://www.allaboutcookies.org/manage-cookies/index.html>

Website Analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from the Your Life Strategy website and our client portal, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites. You cannot be identified personally from this information and no personal information is stored about you.

Changes to This Privacy Policy

This policy is effective as of 19 June 2023, and will remain in effect with respect to changes in its provisions in future, which will come into effect once this document is updated.

Your Life Strategy reserve the right to alter this policy at any time and suggest that you check it periodically.

Your continued use of our service following any modification to this policy constitutes your acknowledgement of the modifications and consent to abide by and be bound by the modified Privacy Policy.

If material changes are made to the Privacy Policy, you will be notified whether through email you have supplied or by prominent notice on the website.

Contact Us

For any further information or inquiries from Your Life Strategy regarding this Privacy Policy generally please contact our Marketing and Communications Manager below:

Email: cgrimmer@youfirst.com.au

Office: 16 Marana Street, Shailer Park QLD 4128

Mail: PO BOX 3457 LOGANHOLME QLD 4129

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Australian Information Commissioner at www.oaic.gov.au.