PRIVACY POLICY

Infocus Wealth Management Limited
ABN 28 103 551 015
Level 2, Cnr Maroochydore Road & Evans St,
Maroochydore QLD 4558
07 5406 5000

VERSION 16.0
Date Effective: December 2025

PRIVACY POLICY: OUR COMMITMENT

This document outlines Infocus' policy with respect to handling the personal information we collect.

'Infocus', 'we', 'us' or 'our' refers to Infocus Wealth Management Limited ABN 28 103 551 015 and its related entities (the 'Group') including 'Authorised Representatives' meaning Financial Advisers and Mortgage Brokers operating under the AFSLs of the Group.

We collect personal information to provide you with the products and services you request as well as to provide information on other products and services offered by or through us. The law requires us to collect and retain personal information. Personal information may be used and disclosed within the Group to administer our products and services, and, unless you tell us otherwise, to provide you with related marketing information.

We will act to protect your personal information in accordance with the Australian Privacy Principles (APP). We only collect the personal information we reasonably require, in the course of our business of providing services, in accordance with this Privacy Policy by lawful, fair, and non-intrusive means. We cooperate with police and other enforcement and regulatory bodies as required or allowed by law.

You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please let us know so that we can correct it (refer to contact details in this document.)

The information in this document is considered to be true and correct at the date of publication. Changes to circumstances after the time of publication may impact on the accuracy of the information held.

SERIOUS PRIVACY BREACHES - YOUR NEW LEGAL RIGHTS

Important: As of June 2025, Australian law provides individuals with the right to take legal action for serious invasions of privacy. This includes situations where there has been:

- Intrusion upon your seclusion; or
- Misuse of your personal information

that would be highly offensive to a reasonable person. You may be entitled to compensation and other remedies through the courts.

Infocus is committed to preventing serious privacy breaches through robust privacy protection measures, comprehensive staff training, and strict adherence to privacy laws. We take your privacy rights seriously and have implemented enhanced security and governance measures to protect your personal information.

What personal information do we collect and hold

The type of personal information we may collect from you includes, but is not limited to:

- Names, address, email, phone numbers, and job titles
- Information in identification documents such as your passport or driver's license
- Tax file numbers (TFN) and other identification numbers such as Medicare number
- Date of birth and gender
- Financial information, including income, expenses, assets and liabilities
- Details of superannuation and insurance arrangements
- Sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties
- Bank account details, shareholdings, and details of investments
- Educational qualifications, employment history, and salary
- Visa or work permit status
- Personal information about your spouse and dependents

Special Protection for Financial Hardship Information: We apply enhanced security and confidentiality measures to information relating to financial hardship or vulnerability.

Children's Information (Under 18 years): We apply additional protections when collecting personal information about individuals under 18 years of age, including enhanced consent requirements and security measures. Where required, we obtain parental or guardian consent before collecting information about minors.

The only circumstances in which we would collect, use, or disclose your government-related identifiers is where we are required or authorised by law to do so. For example, we may be required to disclose your Tax File Number (TFN) to the Australian Taxation Office, a superannuation or retirement income product provider.

As well as providing us with information upon which to provide a customised solution to your needs and objectives, we are required under the Corporations Act 2001 (Cth) and the National Consumer Credit Protection Act 2009 (Cth) to collect and hold this information.

How and why we collect information

We collect personal information from you in a variety of methods. Examples of the ways we collect personal information include:

- Through communications between you and our representatives or your adviser or accountant
- Your use of our website
- You completing application forms in relation to products and services
- Through other avenues, where required to meet regulatory requirements and comply with the law
- You apply for employment with us
- Through marketing activities which request information from you, such as surveys
- From publicly available sources of information such as social media websites

Unsolicited Personal Information:
If we receive personal information about you that we did not request (unsolicited information), we will assess whether it is necessary for our business purposes. If we determine that the information is not required, we will take reasonable steps to destroy or de-identify it as soon as practicable, in accordance with the Australian Privacy Principles. Where applicable, we may also request that you delete these related communications.

Because our products and services are often offered by other intermediaries such as financial planners, solicitors, or accountants, we may collect personal information about you from these third parties. When we collect information in this way, we will seek your approval prior to collection. Generally, the sharing of information between intermediaries occurs via a secure method, to be agreed upon with the intermediaries and in line with this privacy policy.

We will only collect personal information from you where it is reasonably necessary for us to provide our services to you or to perform our functions or activities.

We will only collect sensitive information from you with your consent, except in permitted general situations which include:

- The collection of the information is required or authorised by or under an Australian law or a court/tribunal order
- The collection is necessary to address a threat to an individual's life, health, or safety
- Permitted health situations

Identification Requirements: Identification documentation is required for collection by law under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), as we are required to know our clients. In some instances, we are required to verify this documentation against other records. For instance, identification for Australian companies, trusts, or registered co-operatives may need to be verified by a search of records held by regulatory bodies such as the Australian Securities and Investments Commission (ASIC) or the Australian Taxation Office (ATO).

Automated Decision-Making

Computer-Based Decisions: We may use computer systems and technology (including artificial intelligence) to assist in making decisions that could significantly affect you. This may include:

- Risk assessment and credit decisions
- Compliance screening and monitoring
- Product recommendations and suitability assessments
- Identity verification processes

Personal Information Used: When we use automated decision-making, we may use various types of your personal information including financial data, identification information, and transaction history.

Your Rights: You have the right to:
- Know when automated decision-making is being used
- Request human review of automated decisions
- Access information about how decisions are made
- Contact us to discuss any concerns about automated processes.

Use and disclosure of information

We will use the information you supply for the purpose of providing you with the services agreed under our engagement and related services, to meet obligations we may have at law, including in relation to health and safety.

We are obliged to maintain records which include personal information and make those records available for inspection by ASIC or other regulators under relevant law. If we provide information for the purpose of law enforcement activities, we will make a record of that provision.

It is a condition of our agreements with each of our authorised representatives (both personal and corporate) that they adopt and adhere to this Privacy Policy.

Information Quality: The effectiveness of our services is specifically dependent on information you provide and it being relevant, complete, accurate and up-to-date. Without this, our services may not meet your needs or may result in unforeseen financial consequences.

If you chose not to provide your information

IIf you elect not to provide us with your personal information, as and when requested, we may not be able to provide you with services. This is because:

- We have legal obligations to collect certain information
- Risk assessment and compliance requirements cannot be met
- Product recommendations cannot be properly tailored to your circumstances
- Regulatory reporting obligations may prevent service provision

Disclosing information to other parties

In order to provide our services, we may disclose your personal information to internal and external parties, including, but not limited to:

- Other entities who refer your business to us
- Affiliated product and service providers as well as external service providers such as superannuation fund trustees, insurance providers, and product issuers for whom we act as agents
- Auditors we appoint to ensure the integrity of our operations
- Suppliers from whom we order goods and services on your behalf
- Other persons acting on your behalf including your accountant, solicitor, executor, administrator, trustee, guardian, or attorney
- If required or authorised to do so under law, law enforcement agencies, regulatory bodies, and government organisations
- Medical assessment services where you have sought insurance for the purposes of underwriting an insurance policy
- Other organisations, who, in conjunction with us, provide their products and services
- Other AFSLs, authorised representatives or their agents for the purpose of due diligence on one of our associated entities were they to decide to sell all or part of their business

Business Transfer: In the event that a sale of business takes effect, we may transfer your personal information to the purchaser of the business. As a client, you will be advised of any such transfer and your information will not be exchanged if you object to the transfer.

Outsourced Functions: We disclose personal information when we outsource certain functions, including paraplanning, telemarketing, bulk mailing, market research, direct marketing, and information technology support; we may also seek expert help from time to time to improve our systems, products, and services.

Confidentiality: In all circumstances where personal information may become known to our contractors, agents, AFSLs, authorised representatives or their agents, and outsourced service providers, there are confidentiality arrangements in place. These parties are not able to use or disclose personal information for any purposes other than our own.

Sending personal information overseas

We take reasonable steps to ensure that overseas recipients adhere to the Australian Privacy Principles (APP). We may disclose your personal information to contractors overseas to provide services to you; however, when doing so you should be aware of the following:

- Your personal information may be accessed by our Group staff, representatives, or agents in other countries if that becomes necessary to deliver our services to you. This access is via a secure internet connection or, in some instances, by encrypted email
- From time to time, information may be loaded to secure cloud storage
- Product and service providers we recommend may outsource functions using overseas contractors or companies that process these services using offshore resources

Approved Countries: We monitor government approvals of countries that provide substantially similar privacy protections to Australia's Australian Privacy Principles and will prioritise transfers to these approved jurisdictions where possible.

Service Provider Locations: These service providers may be located in a number of countries including the United States of America, United Kingdom, Philippines, India, China, Serbia, Vietnam, and/or Sri Lanka.

Your Consent: When transferring information overseas, we will either:

- Ensure the recipient is bound by substantially similar privacy protections; or
- Obtain your explicit consent after informing you of the risks

Keeping your Information Secure

Your personal information is generally held in your client file and on our computer database. We will always seek to ensure that your personal information is protected from misuse, loss, unauthorised access, modification, or disclosure. At all times, your personal information is treated as confidential, and any sensitive information is treated as highly confidential.

Technical and Organisational Security Measures:
Our comprehensive security framework includes both technical and organisational measures as required by law:

Technical Measures:

- All computer-based information is protected through the use of passwords on each computer, screen saver passwords, and the majority of software/applications via Multi-Factor Authentication
- Client data is backed up each evening and stored securely with encryption
- Encrypting data sent from your computer to our systems during internet transactions, and customer access codes transmitted across networks
- Employing firewalls, intrusion detection systems, and virus scanning tools to protect against unauthorised persons and viruses from entering our systems
- Using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing

Organisational Measures:

- Comprehensive privacy and cybersecurity training for all authorised representatives and staff
- All hard copy files are stored in lockable cabinets/rooms with restricted access
- Access to our premises is controlled by only allowing authorised personnel to access locations where personal information is stored
- A Cyber Security Standard, which covers Artificial Intelligence (AI) guidelines, and third-party providers and systems
- Regular security risk assessments and reviews
- A Cyber Incident Response Plan and a Data Breach Response Plan
- Confidentiality agreements with all staff and contractors
- Regular monitoring and auditing of privacy practices

Data Retention and Destruction:

- Financial services records: Maintained for 7 years after relationship ends (regulatory requirement)
- Identification documents: Maintained for 7 years after verification
- Marketing information: Maintained until you opt out or relationship ends
- Employment records: Maintained for 7 years after employment ceases
- General correspondence: Maintained for 3 years unless related to ongoing services

In all cases, where information we hold is identified as no longer needed for any purpose, we ensure it is effectively and securely destroyed using certified data destruction methods.

Data Breach Notification: We are required to give notice to the Office of the Australian Information Commissioner (OAIC) and affected individuals of an "eligible data breach." This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC within prescribed timeframes.

Websites, Marketing and Social Media

We may use personal information collected from you for the purpose of providing you with direct marketing material or from social media platforms. Where we have collected your information directly and the marketing is related to our products or services that you would reasonably expect, we may send marketing communications without obtaining explicit consent. If you do not wish to receive such information, you can request not to receive it. Simply contact us by any of the methods detailed in this document. There is no cost for this request; however, please allow two weeks for your request to be actioned.

Website Data Collection: When you visit our website, details may be recorded about your visit, such as time and date, your computer IP address, pages accessed, time spent on the page, and type of browser. This information is used in an anonymous format for statistical purposes and cannot identify you individually, unless we have sought permission from you to do so.

Cookies: Should you log into a client section of our website, we may use cookies to identify who you are while you are logged in for the session. The cookie is unique to that session, and the data within the cookie is encrypted. You must have cookies enabled to be able to use our site.

Third-Party Websites: Our website may contain links to other websites. When visiting these websites, be sure to check their Privacy Policy as we are not responsible for the privacy practices of those other parties.

Email Communications: Where you choose to communicate with us by email, we will store your email, name, and address with any other contact or personal details you have provided on our database.

Spam Act Compliance: The Group adheres to the Spam Act 2003 (Cth); accordingly, we will:

- Obtain your consent before sending an electronic message to you (this can be express or inferred)
- Provide sender identification (so that you know who sent the message)
- Provide you with the option to unsubscribe

In addition, for telemarketing activities, we comply with the Do Not Call Register Act 2006 (Cth). This means we will not make telemarketing calls to numbers listed on the Do Not Call Register unless you have provided consent or an exemption applies.

Accessing and correcting your information

You can request us to provide you with access to your personal information we hold about you by contacting us using the details below. To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete, or out of date, and we will take reasonable steps, in the circumstances, to ensure that it is corrected.

Access Rights: In most cases, we will provide access to your personal information within 30 days of your request, unless an exception applies under the Privacy Act.

Correction Process: If you request correction of your personal information, we will:

- Take reasonable steps to correct the information if we agree it is inaccurate, incomplete or out of date
- If we refuse to correct information, provide written notice explaining our decision and your rights to complain
- Associate a statement with the information if correction is not possible

Members of our Group

The Infocus Group includes Infocus Wealth Management Limited ABN 28 103 551 015 and its related bodies corporate. It also includes Corporate Authorised Representatives and Authorised Representatives of our wholly owned Australia Financial Services Licensees (AFSLs) and Australian Financial Services Credit Licensees.

Members of the Group that have collected personal information are permitted by the Privacy Act 1988 (Cth) to disclose personal information to other members of the Group. This enables the Group to have an integrated view of its clients.

Information Flow Protection: When personal information is shared between Group entities:

- The same privacy protections apply
- Access is limited to staff who need the information for legitimate business purposes
- All transfers are logged and monitored
- You have the right to know which entities hold your information

Related Entities and Services:

Each entity and their representatives are liable only for the services provided within their discipline. The following entities are all subsidiaries of Infocus Wealth Management Ltd ABN 28 103 551 015:

- Infocus Securities Australia Pty Ltd ABN 47 097 797 049 Australian Financial Service Licence and Australian Credit Licence No. 236523 provides financial and mortgage broking services
- Infocus Lending Advisory Pty Ltd ABN 19 134 237 031 and Australian Credit Licence Number 392704, trading as Infocus Lending Advisory, provides all mortgage and lending services
- Infocus Tax & Business Advisory Pty Ltd ABN 40 615 064 983, trading as Infocus Tax & Business Advisory, is responsible for the provision of tax, accounting and business advisory services
- Infocus Financial Planning Pty Ltd ABN 78 129 238 099, trading as Infocus Financial Advisory, is a Corporate Authorised Representative of Infocus Securities Australia Pty Ltd and provides financial services
- Alpha Investment Management Pty Ltd ABN 13 122 381 908 (Australian Financial Services Licence No. 307379) provides Investment management services
- Alpha Fund Managers Pty Ltd ABN 37 124 085 883 is the Investment Manager for the Alpha Fund Series
- Portfoliofocus Pty Ltd ABN 40 098 278 589 provides marketing and promotional services
- Portfolio Administration and Reporting Pty Ltd ABN 85 145 006 757 provides marketing and promotional services
- Platformplus Pty Ltd ABN 46 103 551 533 is the entity responsible for Platformplus Wealth Management System and is the Promoter of PlatformplusWRAP
- Madison Financial Group Pty Ltd ABN 36 002 459 001 Australian Financial Services Licence 246679 provides financial services
- Wealthportal Pty Ltd ABN 61 131 002 036 is a promoter of the WealthPortal investment and superannuation platform

How to Complain

We take your privacy seriously. If you have a complaint about your privacy please tell us, as we'd like the chance to fix the problem. The Group have procedures in place to deal with complaints fairly, transparently and quickly.

Step 1: To raise a complaint regarding privacy please contact us on (07) 5406 5000 to discuss your concerns. Alternatively, you can email or write to us at:

Mail: The Complaints Manager
Infocus Securities Australia Pty Ltd (Infocus)
PO Box 1856, Sunshine Plaza QLD 4558

Email: Professional.Standards@infocus.com.au

Step 2: Your complaint should include details of your privacy concerns, a brief summary of the facts relating to your complaint, and how you believe we can resolve the matter to your satisfaction.

Step 3: Infocus will investigate your complaint and will make every effort to ensure you receive a fair and prompt reply. For complaints relating to financial services, we provide you a written response within 30 calendar days of receiving your complaint. We will keep you informed of the progress of your complaint if this investigation cannot be resolved within this time.

Step 4: If you are unhappy with our response, or have not received a response within the required timeframe, you can lodge a complaint with the Australian Financial Services Complaints Authority (AFCA).

Step 5: Infocus is a member of the external complaints resolution scheme operated by the AFCA. AFCA provides free advice and assistance to customers not satisfied with the responses provided by member companies to their complaints. AFCA may undertake an independent external investigation of the complaint or enquiry. Member companies like Infocus are bound by any decisions made by AFCA.

Australian Financial Complaints Authority Contact:

- **Phone:** 1800 931 678
- **Mail:** Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
- **Website:** www.afca.org.au
- **Email:** info@afca.org.au

Privacy Commissioner: You may also complain directly to the Office of the Australian Information Commissioner about our handling of your personal information at www.oaic.gov.au or phone 1300 363 992.

Contact Us

If you seek any further information from the Group about our Privacy Policy, please contact:

Email: Professional.Standards@infocus.com.au

Address: Level 2, Cnr Maroochydore Road & Evans Street Maroochydore QLD 4558

Postal: PO Box 1856 Sunshine Plaza QLD 4558

Telephone: (07) 5406 5000

Consent for Mortgage Broking Clients

By asking us to provide you with our services in regards to Mortgage Broking, you consent to the collection, use and disclosures to overseas recipients of the personal information you have provided to us for the purposes described above. This consent includes understanding that:

- Information may be transferred to overseas service providers
- These transfers are subject to the protections outlined in this policy
- You have the right to withdraw consent (though this may affect our ability to provide services)

CLIENT 1 SIGNATURE		**DATE**	
CLIENT 2 SIGNATURE		**DATE**	
fuLL NAME (PRINTED		**DATE**	