

Security and privacy policy

This is the security and privacy policy for Personalised Planning Pty Ltd ABN 18 007 047 645 AFSL 246843, which trades under the following business names:

- Enterprise¹²¹
- PPPL
- Access¹²¹

This security and privacy policy statement relates to the activities of all businesses named above. Hence, when referring to Personalised Planning Pty Ltd, this document refers to Enterprise¹²¹, PPPL and Access¹²¹.

Personalised Planning Pty Ltd ('PPPL', 'we', 'us') is a member of the Commonwealth Bank Group of companies and has adopted the principles set out in the Privacy (Private Sector) Amendment Act 2000 across all our businesses, as part of our continuing commitment to client service and the maintenance of client confidentiality.

How we handle your personal information

Personal information is information or opinion that allows others to identify you. It includes your name, age, gender, contact details, as well as your health and financial information. We will act to protect your personal information in accordance with the National Privacy Principles or an industry privacy code.

At PPPL we value your trust and aim to help you manage and build wealth over a long period. The protection of your personal information is a vital part of this relationship. It is supported by our experience in keeping personal information confidential.

We collect personal information to provide you with the products and services you request as well as information on other products and services offered by us. The law may also require us to collect personal information. We will tell you who collects the personal information and advise you of their contact details, your right of access to that information, and what will happen if you choose not to provide the information.

Personal information may be used and disclosed within PPPL to administer our products and services, as well as for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required or allowed by law.

We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.

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 inform us so that we can correct it. If we deny access to your personal information, we will let you know why. For example, we may give an explanation of a commercially-sensitive decision, rather than direct access to evaluative information connected with it.

Further information and feedback

The pages that follow contain more detailed information about our privacy and information handling practices.

If you have any questions or would like further information on our privacy and information handling practices, please contact us by:

- e-mail at ask@enterprise121.com
- telephone 1300 000 121*, or 8618 5500 (if calling locally)
- writing to the address below:
The Privacy Officer
PPPL
Level 42, Rialto South Tower
525 Collins Street
Melbourne Victoria 3000

* Cost of a local call unless made from a mobile phone, which will be charged at the applicable mobile rate.

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Background

Common law duty of confidentiality

As part of the general law governing the Australian Financial Services (AFS) licensee/customer contract, AFS licensees have always been required to keep any information about their customers in the strictest confidence. Traditionally, AFS Licensees could only disclose information they hold about a customer if:

- they had the customer's express or implied consent;
- the disclosure was compelled by law; for example, under Taxation Acts;
- the disclosure was required in the best interests of PPPL; for example, to a court if PPPL is defending or conducting legal action involving a customer. This exception does not, as it is sometimes thought, allow PPPL to disclose information for any purpose it chooses; or
- the disclosure was in the public interest; for example, if a customer's dealings indicate that he or she was trading with the enemy during a time of war. This exception is used rarely and only in the most serious circumstances.

As a matter of policy, all members of PPPL observe this standard of confidentiality. While these general requirements remain in place, all members of PPPL have broader obligations, under the National Privacy Principles, which are contained in the Privacy Act 1988 (Cwth).

Privacy Amendment (Private Sector) Act 2000

In December 2000, the Commonwealth Government enacted privacy legislation, which commenced 21 December 2001, amending the Privacy Act (implementing the National Privacy Principles) to include provisions that regulate the way private sector organisations collect, use, disclose, keep secure and provide access to personal information.

PPPL acts to protect your personal information in accordance with the National Privacy Principles.

This document

The information in this document details how we comply with the requirements of the Privacy Act in protecting the personal information we hold about you.

Collection of personal information

What is 'personal information'?

Personal information is information or an opinion, whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can reasonably be ascertained, from the information or opinion.

Why we collect information

Personal information is collected so that we may:

- administer our customer relationships; and
- provide customers with the products and services they request.

Personal information may also be used for:

- monitoring and evaluating products and services;
- gathering and aggregating information for statistical, prudential, actuarial and research purposes;
- assisting customers with queries; and
- taking measures to detect and prevent frauds and credit loss.

What we collect

Personal information collected by members of PPPL generally comprises name, address, date of birth, gender, marital status, occupation, account details, contact details (including telephone, facsimile and e-mail) and financial information. Sometimes we collect a few personal details unlikely to be known to other people to help us identify you over the telephone.

If you are applying for credit we may also collect the number and ages of your dependants, the length of time at your current address, your employer's name and contact details, the length of your employment, proof of earnings and, if you have changed employer in the last few years, details of your previous employment. We use this information to assist in making responsible credit decisions. In addition, as required by Part IIIA of the Privacy Act 1988, we will obtain your consent to collect, use and disclose credit information about you.

If you have or are applying for life insurance or income protection insurance, we also collect medical and lifestyle information that relates to the insurance. This information may include your sexual activity and is collected so we may assess whether to accept your insurance proposal and, if so, on what terms.

If you are applying to join an affinity (professional associations and organisations) program, we will collect information regarding your membership of the relevant body so that we may confirm your eligibility to participate.

We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. The Financial Transaction Reports Act 1988 requires us to sight and record details of certain documents (for example, birth certificate, passport) in order to achieve 100 points of identification.

Where it is necessary to do so, we also collect information on individuals such as company directors and officers (where the company is our customer) as well as customers' agents and persons dealing with us on a 'one-off' basis.

We may take steps to verify the information we collect; for example, a birth certificate provided as identification may be verified with records held by the Registry of Births, Deaths and Marriages to protect against impersonation, or we may verify with an employer that employment and remuneration information provided in an application for credit is accurate.

We do not collect information about your political or religious beliefs or ethnic background.

What if you provide incomplete or inaccurate information?

We may not be able to provide you with the products or services you are seeking.

Obtaining your consent

In most cases, before or at the time of taking out a new product from a member of the Commonwealth Bank Group (or, if that is not practicable, as soon as practicable thereafter) the collecting member obtains your consent to the purposes for which it intends to use and disclose your personal information.

If you do not give us consent, we may not be able to provide you with the products or services you want. This is because it is impracticable for us to treat some customers differently because, for example, they don't want their statements to be prepared and mailed by an external provider with which we have made arrangements to provide this service to all customers.

Please refer to the 'Other disclosures' section for details of the confidentiality arrangements that apply when functions are outsourced.

Withdrawing consent

Having provided consent, you are able to withdraw it at any time. To withdraw consent, please contact the member of the PPPL from whom consent is to be withdrawn. Please note that withdrawing your consent may lead to your PPPL authorised representative no longer being able to provide you with the product or service you enjoy given that, as mentioned above, it is impracticable for us to treat some customers differently.

Information collected from someone else

In some cases, your personal information may be provided to us by your agents, or by family members or friends. We will take reasonable steps to let you know that we have your personal information, unless it is obvious from the circumstances that you know or would expect us to have the information, such as where a broker is acting on your behalf. Reasonable steps may include asking the person who gave us your information to let you know that we have that information.

Collection from young people

Requests from young people (those under 16 years of age) to open bank accounts are normally satisfied by opening specially designed accounts. These accounts are opened in the name of the young person, although a parent or guardian's personal information is also collected. The parent or guardian is the authorised signatory who operates the account, and who provides the consent to the use and disclosure of personal information.

A direct request from a young person to open or operate an account or to acquire other products or services from the Commonwealth Bank Group in his/her own name is considered on its merits.

Other disclosures

Who we may communicate with

Depending on the product or service you have and the PPPL authorised representative you are dealing with, we may exchange personal information with:

- brokers and agents who refer your business to us;
- external product providers for whom we act as an agent (so that they may provide you with the product you seek);
- auditors we appoint to ensure the integrity of our operations;
- any person acting on your behalf, including your financial adviser, solicitor and accountant, executor, administrator, trustee, guardian or attorney;
- your referee (to confirm details about you);

- if required or authorised to do so, regulatory bodies and government agencies;
- other financial institutions and organisations at their request if you seek credit from them (so that they may assess whether to offer you credit);
- suppliers from whom we order goods on your behalf (so that the goods may be provided to you); and
- other organisations who in conjunction with us provide products and services (so that they may provide their products and services to you).

The exchange of personal information may not be limited to these examples or examples of a similar kind.

Outsourcing

We disclose personal information when we outsource certain functions, including bulk mailing, market research, direct marketing, statement production, debt recovery and information technology support. We also seek expert help from time to time to help us improve our systems, products and services.

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

PPPL takes its obligations to protect customer information very seriously and we make every effort to deal only with parties who share and demonstrate the same attitude.

Sending personal information overseas

We send personal information overseas if we outsource functions using overseas agents or contractors, or to complete a particular transaction, such as an International Money Transfer.

Disclosure required by law

We may be required by law to disclose information, for example, when we are served with a court order. We may also be required by a Government Agency to produce information and records, for example, pursuant to taxation or social security laws.

Disclosure as a result of your actions

There may be circumstances in which we consider you, by your actions, to have released us from our duty of confidentiality or to have consented to the disclosure of information about you without actually saying so (for example, if you discuss your financial position publicly to the media, in such a way as to leave us with little alternative but to respond publicly).

Securitisation

Securitisation involves the pooling of assets (such as loans) of a similar kind and the sale of the pooled assets to a special purpose vehicle. To facilitate the process, we may disclose personal information to any person to whom our rights in the assets are to pass or proposed to pass and to any ratings agencies, trustees, investors and advisors involved in the transaction.

Personal information quality

Our goal is to ensure that the personal information we hold is accurate, complete and up-to-date. Please contact us if any of the details you have provided change. Please also contact us if you believe that the information we have about you is not accurate, complete or up-to-date.

We may take steps to update personal information, for example, an address, by collecting personal information from publicly available sources, for example, telephone directories or electoral rolls.

Personal information security

We are committed to keeping secure the personal information you provide to us. We take all reasonable precautions to protect the personal information we hold about you from misuse and loss and from unauthorised access, modification or disclosure.

We have a range of physical and technology policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

Our security measures include, but are not limited to:

- restricting access to our computer systems and physical records to authorised persons and preventing users from accessing information they have no need to access;
- requiring employees to use unique passwords to gain access to systems. These passwords are changed regularly and their use is independently monitored;
- 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 prevent unauthorised persons and viruses from entering our systems;
- using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;

- practising a clean desk policy in all premises occupied by PPPL and providing secure storage for physical records; and
- detecting and preventing unauthorised access to buildings by employing physical and electronic means such as alarms, cameras and guards as required.

Where information we hold is identified as no longer needed for any purpose we ensure it is effectively and securely destroyed, for example, by shredding or pulping in the case of paper records or by degaussing (demagnetism of the medium using alternating electric currents) and other means in the case of electronic records and equipment.

Online

Collection of information via web site activity

For statistical purposes we collect information on web site activity (such as the number of users who visit our web sites, the date and time of visits, the number of pages viewed, navigation patterns, what country and what systems users have used to access the site and, when entering one of our web sites from another web site, the address of that web site) through the use of 'cookies'. This information on its own does not identify an individual but it does provide members of PPPL with statistics that can be used to analyse and improve its web sites.

Cookies

A 'cookie' is a packet of information that allows the server (the computer that houses the web site) to identify and interact more effectively with your computer.

When you use one of our web sites, we send you a temporary cookie that gives you a unique identification number. A different identification number is sent each time you use one of our web sites. Cookies do not identify individual users, although they do identify a user's browser type and your Internet Service Provider (ISP).

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Please refer to your browser instructions or help screens to learn more about these functions. If you reject all cookies, you may not be able to use our web sites.

To evaluate the effectiveness of our web site advertising, we may use third parties to collect statistical data. No personal data is collected on these occasions.

Links to other websites

Our web sites may contain links to non-PPPL web sites. While such links are provided for your convenience, you should be aware that the information handling practices of the linked web sites might not be the same as ours.

Telephone

We may monitor and record telephone calls for training and security purposes. You will be notified of any monitoring or recording at the commencement of each call.

Direct marketing

One of the reasons we collect personal information is so that we may provide you with information on products and services offered by authorised representatives of PPPL. Whilst we are permitted by the Privacy Act to disclose personal information to other members of PPPL and we do so to enable PPPL to have an integrated view of its customers, it is important to note that PPPL's policy is that authorised representatives of PPPL with whom you do not have a relationship will not use that information for the purpose of contacting you.

For example, it is against PPPL's policy for Advice¹²¹ to use the personal information of customers to identify and direct market to people who did not already have a relationship with Advice¹²¹. However, PPPL itself may inform a customer of the services available from itself or other members of PPPL provided that the customer has not instructed us not to direct market.

You may, if you wish, indicate that you do not want to receive information on products and services offered by or through the collecting member by:

- 'ticking the box' on the form you sign when you take out a product or service; or
- contacting the collecting member at any time to indicate that you wish to 'opt out' of receiving such information.

Please note that if you provide your information to more than one member of the Commonwealth Bank Group, you will need to tell each member separately if you wish to 'opt out' of receiving information from them.

Changes to our privacy and information handling practices

PPPL may make changes to its privacy and information handling practices from time to time for any reason. We will publish those changes on our web sites and, if there are important changes or a lot of minor changes, by updating this document. The date of this document is shown on the page footer, below.

Access to personal information

You can request us to provide you with access to the personal information we hold about you.

How to gain access

Requests for access to limited amounts of personal information, such as checking to see what address or telephone number we have recorded, can generally be handled in a branch or over the telephone.

With regards to request for access to more substantial amounts of personal information, we will require you to complete and sign the 'Request for Access to Personal Information under the National Privacy Principles' form, and either mail it to:

Privacy Officer
Personalised Planning Pty Ltd
Level 42, Rialto South Tower
525 Collins Street Melbourne Victoria 3000

Following receipt of your request, our Customer Relations area will provide you with an estimate of the access charge and confirm that you want to proceed. Unless you have authorised us to debit your account, access will not be provided until payment is received.

An access charge may apply

An access charge may apply, but not to the request itself. The charge is for the time we spend on locating, collating and explaining the information you request (generally based on a rate of \$60 per hour or part thereof) plus any photocopying costs and out of pocket expenses (such as freight and travelling costs).

Responding to an access request

We will respond to your access request as soon as possible. We will endeavour to comply with your request within 14 days of its receipt but, if that deadline cannot be met owing to exceptional circumstances, your request will be dealt with within 30 days. It will help us in providing access if you can tell us what you are looking for. Your identity will be confirmed (including the verification of your signature) before access is provided.

Requests may be denied or limited

If particular circumstances apply, we are permitted by the Privacy Act to deny your request for access, or limit the access we provide. In such circumstances, we will let you know why your request is denied or limited. For example, we may give an explanation of a commercially-sensitive decision, rather than direct access to evaluative information connected with it.

Jointly held information

Where we hold your personal information in conjunction with that of another individual or individuals (eg. where you jointly conduct an account), we will allow each individual to access their own personal information and the joint information (eg. account balances and transaction details), but not the personal information of the other individual(s).

Contacting us about our privacy and information handling practices

If you have any questions or would like further information about our privacy and information handling practices, please contact us by:

- e-mail at ask@enterprise121.com
- telephone 1300 000 121* or 8618 5500 (if calling locally)
- writing to the address below:
Privacy Officer
Personalised Planning Pty Ltd
Level 42, Rialto South Tower
525 Collins Street Melbourne Victoria 3000

* Cost of a local call unless made from a mobile phone, which will be charged at the applicable mobile rate.

Making a privacy complaint

We recognise that even in the best run organisations things can go wrong. Should you have a privacy complaint, please tell us because it gives us the opportunity to fix the problem and to avoid reoccurrences. We offer a free internal complaint resolution scheme to all of our customers. Our personal and small business customers also have free access to an external dispute resolution scheme.

To assist us in helping you, we ask you to follow a simple three-step process:

1. Gather all supporting documents about the matter of complaint, think about the questions you want answered and decide on what you want us to do.
2. Contact PPPL, where your situation will be reviewed and, if possible, resolved straight away. A quick chat is all that's required to resolve most issues.
3. If at this stage the matter has not been resolved to your satisfaction, please contact our Customer Relations team using the above contact points. We will provide you with the name and contact details of the officer who will investigate your complaint, answer your questions and do all they can to regain your confidence.

If you are still not satisfied, we will tell you about the external dispute resolution avenues available to you.