

Privacy Policy

Section A – Introduction

1. Introduction

- 1.1 Sustainable Life Solutions Pty Ltd ACN 655 297 886, its affiliates and related parties, are committed to managing personal information in accordance with the *Privacy Act 1988* (Cth) ("**Privacy Act**") and the Australian Privacy Principles ("**APP**") and any other applicable laws.
- 1.2 The information in this document details how we, Sustainable Life Solutions Pty Ltd, comply with the above requirements in protecting the personal information we hold about you.
- 1.3 We are an Australian Financial Services Licensee specialising in general advice.
- 1.4 Personal information is any information or opinion about you that is capable, or reasonably capable, of identifying you, whether the information or opinion is true or not and is recorded in material form or not.
- 1.5 Sensitive information includes such things as your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record, that is also personal information. Your health, genetic and biometric information and biometric templates are also sensitive information.
- 1.6 We will act to protect your personal and sensitive information in accordance with the Australian Privacy Principles and the Privacy Act.
- 1.7 We collect personal and/or sensitive information to provide you with the products and services you request as well as information on other products and services offered by or through us. The law requires us to collect personal and/or sensitive information.
- 1.8 Your personal and/or sensitive information may be used by us to administer our products and services, 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.
- 1.9 We disclose relevant personal information to external organisations, including product providers and those that help us provide services.
- 1.10 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 If the information we hold about you is inaccurate, incomplete, or outdated, please inform us so that we can correct it.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, or give you access to the information through a mutually agreed intermediary, rather than direct access to evaluative information connected with it.

Section B – Collection of Personal Information

2. Why We Collect Information

- 2.1 We collect personal information when it is reasonably necessary for one or more of our functions or activities.
- 2.2 These include:
- (a) providing customers with the products and services they request and, unless they tell us otherwise, to provide information on products and services offered by us and external product and service providers for whom we act as agent. (If you have provided us with your email or mobile phone details, we may provide information to you electronically with respect to those products and services);
 - (b) complying with our legal obligations;
 - (c) monitoring and evaluating products and services;
 - (d) gathering and aggregating information for statistical, prudential, actuarial and research purpose;
 - (e) assisting customers with queries; and
 - (f) taking measures to detect and prevent frauds.

3. Information We May Collect

- 3.1 The personal and sensitive information we collect generally consists of name, address, date of birth, gender, marital status, occupation, account details, contact details (including telephone, facsimile and e-mail) and financial information, such as your bank account and credit card details, personal insolvency information and credit-worthiness. Where permitted or required by law, we may also collect Australian Government related identifiers or copies of identity documents, such as drivers licences, passports, Medicare, visa, tax file numbers, individual healthcare identifiers

and related documents. You are entitled to refuse to provide particular types of information, including tax file numbers.

- 3.2 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.

4. How We Collect The Information

- 4.1 We only collect personal information about you directly from you (rather than someone else) unless it is unreasonable or impracticable to do so or you have instructed us to liaise with someone else.
- 4.2 We hold your personal information in our customer relationship management systems which is usually cloud-based but may also be on-premises, in data warehouses or in hard copy files. We manage these systems in several ways. If the information is held or managed by a third-party, we have contractual relations with that party relating to the holding of your personal information. If we hold your personal information, we limit or restrict who may access this personal information and have policies and procedures in place to prevent interference, loss or misuse. These systems may also be managed by third-parties in Australia and overseas with whom we have contractual relations. We may store and disclose personal information overseas, including in the Philippines.

5. Incomplete Or Inaccurate Information

- 5.1 We may not be able to provide you with the products or services you are seeking if you provide incomplete or inaccurate information.

6. Sensitive Information

- 6.1 In addition to the above conditions of collecting personal information, we will only collect sensitive information about you if we obtain prior consent to the collection of the information or if the collection is required or authorised by law.

Section C – Integrity of Your Personal Information

7. Security Of Personal Information

- 7.1 We are committed to ensure that we protect any personal information we hold from misuse, interference, loss, unauthorised access, modification and disclosure.
- 7.2 For this purpose, we have a range of practices and policies in place to provide a robust security environment. We ensure the on-going adequacy of these measures by regularly reviewing them.

Section D – Use or Disclosure of Personal Information

8. Who We May Communicate With

- 8.1 Depending on the product or service you have, the entities we exchange your information with include but are not limited to:
- (a) brokers and agents who refer your business to us;
 - (b) affiliated product and service providers and external product and service providers for whom we act as agent (so that they may provide you with the product or service you seek or in which you have expressed an interest);
 - (c) auditors we appoint to ensure the integrity of our operations;
 - (d) any person acting on your behalf, including your solicitor, settlement agent, accountant, executor, administrator, trustee, guardian or attorney;
 - (e) any person acting on our behalf, including solicitors, accountants, experts and consultants;
 - (f) insurers, including proposed insurers and insurance reference agencies (where we are considering whether to accept a

proposal of insurance from you and, if so, on what terms);

- (g) medical practitioners (to verify or clarify, if necessary, any health information you may provide);
- (h) credit providers or agencies, and others to whom you may owe money.

- 8.2 Our use or disclosure of personal information may not be limited to the examples above.

9. Disclosure Required By Law

- 9.1 We may be required to disclose customer information by law e.g. under Court Orders or Statutory Notices pursuant to taxation or social security laws or under laws relating to sanctions, anti-money laundering or counter terrorism financing.

Section E – Direct Marketing

10. Direct Marketing

- 10.1 We will only use or disclose the personal information we hold about you for the purpose of direct marketing if we have received the information from you and you have not opted out of receiving such information.
- 10.2 Direct marketing means that we should use your personal information to provide you with information on our products and services that may interest you.
- 10.3 If you wish to opt-out of receiving marketing information altogether, you can:
- (a) call us on 1300 754 333 or
 - (b) write to us at admin@slife.com.au.

Section F – Access to Personal Information

11. Access

- 11.1 You can request us to provide you with access to the personal information we hold about you.
- 11.2 If you would like to request access to your personal information, such as details of what is recorded in your account file, we will require you to complete and sign a “Request for Access to Personal Information” form.
- 11.3 We will respond to your request as soon as possible and in the manner requested by you.
- 11.4 Your identity will be confirmed before access is provided.

12. Exceptions

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

13. Refusal To Give Access And Other Means Of Access

- 13.1 If we refuse to give access to the personal information or to give access in the manner requested by you, we will give you a written notice setting out the reasons for the refusal, the mechanisms available to complain and any other relevant matter.
- 13.2 Additionally, we will endeavour to give access in a way that meets both yours and our needs.

Section G – Correction of Personal Information

14. Correction

- 14.1 We will correct all personal information that we believe to be inaccurate, out of date, incomplete, irrelevant or misleading given the

purpose for which that information is held or if you request us to correct the information.

- 14.2 If we correct your personal information that we previously disclosed to another APP entity you can request us to notify the other APP entity of the correction. Following such a request, we will give that notification unless it is impracticable or unlawful to do so.

Section H - Contact Us and Complaints

15. Contact

- 15.1 If you have any questions or would like further information about our privacy and information handling practices, please contact us by:
 - (a) Email: compliance@slife.com.au; or
 - (b) Phone: 1300 754 333; or
 - (c) Post: PO Box 83, Darlinghurst, Sydney, NSW 2010

16. Making A Privacy Complaint

- 16.1 We offer a free internal complaint resolution scheme to all of our customers. Should you have a privacy complaint, please contact us to discuss your concerns.
- 16.2 You will also have free access to an external dispute resolution scheme in which we are member.
- 16.3 To assist us in helping you, we ask you to follow a simple three-step process:
 - (a) Gather all supporting documents relating to the complaint.
 - (b) Contact us and we will review your situation and if possible, resolve your complaint within a reasonable time.
 - (c) If the matter is not resolved to your satisfaction, please contact our Complaints Officer on 1300 754 333 or put your complaint in writing and send it to Sustainable Life Solutions Pty Ltd, PO Box 83, Darlinghurst, Sydney, NSW 2010.

16.4 If you are still not satisfied, you have the right to contact the Office of the Australian Information Commissioner (“**OAIC**”). You can contact the OAIC to make a query concerning your privacy rights, or to lodge a complaint with the OAIC about how we have handled your personal information. You can contact the OAIC’s hotline on 1300 363 992 or visit their website at www.oaic.gov.au. The OAIC has the power to investigate a complaint and make a determination.