

CHPW Financial Pty Ltd

Privacy Policy (“Policy”)

This Policy was last updated on 1 November 2025.

CHPW Financial Pty Ltd [ABN 78 110 598 368] and the Licensee Group (**‘we’, ‘our’, ‘us’, ‘CHPW’**) is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). A full list of entities bound by this Privacy Policy may be found at the end of this document. This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

While we may update our Policy from time to time, the most recent version of this Policy will always be available on our website. If we change the Policy in any material way, we will post a notice on our website along with the updated Policy. We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer in the first instance:

Contact: Privacy Officer

Email: clientservices@chpw.com.au

Phone: (03) 9674 0600

Postal address:

Attention: Privacy Officer

CHPW Financial Pty Ltd

Level 5, 30 Collins Street, MELBOURNE, VIC, 3000

Our website contains links to other websites. When you click on a link to another site, you are no longer subject to this Policy.

1. **What types of information do we collect and why?**

In the course of providing our goods and services to you, we collect personal and other information about our clients, customers and suppliers etc. and how they interact with us, our goods, and our services. When you provide us with your personal information, you are agreeing to our collection and handling of your personal information in accordance with this Privacy Policy. We collect personal information through a number of mechanisms, including:

Collection from you: we collect and store information you provide directly to us (*either in person, by email, by phone, or by any other direct means*) in order to deliver our goods and services. This includes:

- Contact information: such as your name, address, email address, telephone number;
- Personal information: such as date of birth and driver’s licence details;
- Financial and credit information: such as your payment information (credit card, bank account, etc); and/ or
- Business details: such as your Australian Business Number.

- 1.1 **Automatic:** we use cookies (*small text files stored on your devices that provide us with information such as your internet protocol (IP) address, server information, internet service provider, and information on how you interact with our website*) or similar technologies to collect data and other services that allow us to understand how you use our online media.

This information is not linked to you personally.
- 1.2 **Device:** if you use our services or interact with us through a mobile device, we receive technical information about your device, numbers that identify the device and your location information. This information is associated with you.
- 1.3 **Communications:** when you communicate with us, we collect information such as your contact details (such as email address or phone number). You can elect to not receive communications from us by contacting our Privacy Officer.
- 1.4 **Sensitive Information:** We do not collect information considered to be sensitive information in the Privacy Act.

Collection from others: We may collect your personal information from other people where we have your permission to do so or are permitted to do so under law. This includes:

- Financial adviser
- Mortgage broker or other credit representative
- Other professionals who act on your behalf, such as a lawyer or accountant.

2. **How do we use your personal information?**

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related, or in the case of sensitive information, a purpose directly related, to that primary purpose and if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of providing financial planning services.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

2.1 **We may also use your personal information where that use is required or authorised under an Australian law, including to fulfil our own obligations. Use of Artificial Intelligence Systems**

We may utilise some artificial intelligence systems to provide you with our services. This includes the processing of personal information by securely controlled artificial intelligence systems. We may use these systems to e.g. collate information and/ or, draft internal or meeting notes.

If the collation of personal information results in creating new personal information such as allowing a view of your financial position we will always verify that we are permitted to hold this information.

We always ensure that where these artificial intelligence systems are used, they do not disclose your personal information outside of our organisation. If you have any

concerns or questions about our processing of your personal information using artificial intelligence, please contact our Privacy Officer.

2.2 **Related Party and Group Transfers**

CHPW Financial Pty Ltd is wholly owned by the ASX listed entity The Australian Wealth Advisors Group Limited [ACN 653 634 292] and we do not provide your information to other entities within the group of companies. This transfer of information is compliant with s 13B of the Privacy Act.

2.3 **Disclosure of personal information to third parties**

We may disclose your information to third parties who assist us in providing, managing and administering our goods and services. We will also disclose your personal information where such disclosure is required or authorised by Australian law.

We disclose your personal information to third parties that:

- Act on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney;
- Provide financial planning software and paraplanning services;
- For corporate superannuation members, are your employer or your employer's financial adviser;
- Are lenders and credit providers and where they are permitted to collect this information from us;
- Manage and enhance our customer database;
- Process information;
- Assess your interest in our products or services; and
- May have other purposes related to the above.

We do not sell or license your information to third parties.

2.4 **Sending information overseas**

Personal information is sent overseas in limited circumstances. We send personal information to:

- Support service providers located in the Philippines which have access to personal and financial information provided to enable their role in preparing statements of advice and records of advice etc. and/ or
- External service providers that assist our organisation such as with internal operations, market research and the distribution of newsletters, standards and other publications.

We take all steps reasonable in the circumstances to ensure that those we disclose personal information to overseas protect your information. This includes the use of contractual arrangements to control how third parties use and handle personal information overseas.

We utilise data centres located in countries overseas such as the Philippines as described above. While we may store information overseas, we retain exclusive

access to that information, and it will not be further accessed or disclosed except in accordance with this Policy.

2.5 **Disclosure of credit information to third parties**

We do not disclose your credit information to any credit reporting bodies.

3. **How do we store and secure the information we collect?**

We store your personal and financial information as physical files in a secured area or on our electronic data base systems and on computers with appropriate back up and security systems.

3.1 **Security and management of personal information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised access, modification or disclosure. We do this by:

- putting in place physical, electronic and procedural safeguards in line with industry standards;
- requiring any third party providers to have acceptable security measures to keep personal information secure;
- limiting access to the information we collect about you;
- imposing confidentiality obligations on our employees;
- providing privacy training (including on the appropriate use of systems) to those who are responsible for handling your personal information; and
- only providing access to personal information once proper identification has been given.

While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you in accordance with our obligations under the Privacy Act.

If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

4. **How to access and control your information?**

4.1 **Accessing the information we hold about you**

Under the APPs you may be able to:

- obtain a copy of the personal information that we hold about you; and
- identify where we have obtained your Personal Information from, if we have used or disclosed that Personal Information for direct marketing purposes.

To make a request to access this information please contact us in writing. We will require you to verify your identity and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

If we accept your request for access, we may charge a fee to cover the costs of retrieving, reviewing and copying any material requested. However, we will never charge you for making a request to access information itself.

We will provide written reasons if your request (or any part of it) is rejected, as well as providing details for making a complaint about the refusal if necessary.

4.2 **Updating your personal information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact our Privacy Officer if you believe that the information we hold about you requires correction or is out of date.

We endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to financial information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

5. **Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Officer with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#)

You may also direct privacy complaints related to financial advice to: **Australian Financial Complaints Authority (AFCA)** via:

Mail: GPO Box 3, Melbourne, VIC, 3001
Phone: 1800 931 678 (Free Call)
Email: info@afca.org.au
Online: www.afca.org.au

6. **Who does this policy apply to?**

This Privacy Policy may apply to CHPW's Corporate Authorised Representatives that form part of the Licensee's Group. Please refer to each authorised representative's website for details of whether they are bound by this Policy.