

Privacy policy

PMCG Pty Ltd trading as MCG Wealth Management AFSL 281846 ABN 17 101 690 028
Privacy Information

1. Introduction

1.1 In order to provide investment management services to our investors, we need to request and retain some personal information. This allows us to process applications, administer accounts and provide you with information. We may also use your personal details to communicate with you about products and services and comply with relevant laws. We consider all information about our clients to be private and confidential.

1.2 We are required to collect certain personal information under law, including the Corporations Act 2001, the Anti-Money Laundering and Counter Terrorism Financing Act, other financial services laws and taxation laws of Australia and other jurisdictions, international treaties and agreements.

1.3 If you do not provide the personal information requested, we may not be able to process an application, provide services to you or provide you with information about our products and services.

2. Purpose

2.1 The MCG Privacy Policy sets out why we need to collect personal information, how we collect it, what we do with it, how it's stored and who we might share it with. The Policy also describes how you can access or correct information we hold about you, how you can ask further questions or make a complaint, and information about our websites and online activities.

3. Details of Policy

3.1 Collection

Whom do we collect information from?

Wherever practicable, PMCG Pty Ltd trading as MCG Wealth Management will collect information about individuals from those individuals.

However, it may be necessary at times to collect information about individuals from other external sources, such as:

- a financial adviser or broker;
- authorised representatives, such as executors or administrators;
- identification verification service providers; and
- in the case of exchange traded funds, the registrar.

We may also collect information about financial advisers from third parties for the purpose of providing information about our product and services.

What kind of information will we collect

In order to establish and administer accounts for our investors and provide information about our products and services to investors and financial advisers, and to comply with relevant legislation, we may collect all or some of the following:

- full name, date of birth, gender and contact details including telephone, address, e-mail and fax;
- copy of a driver's licence and /or passport or other identification documentation for the purpose of verifying identity and to ensure compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act and/or other legislation and regulations regarding identification verification, and tax reporting and withholding;
- tax file number and bank account details for the purpose of administering investor accounts and tax reporting and withholding;
- investor contribution details and investment choice;
- preferred beneficiaries;
- details about authorised signatories;
- detailed contact information about a financial adviser;
- copies of any relevant trust deeds, partnership agreements, constitutions or articles of association, which may be relevant to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act; and
- details of services investors or financial advisers are interested in and about the investment needs of individual investors, for the purpose of gathering demographic information.

Sensitive Information

Generally, we do not collect sensitive information about you unless required by law or where you consent for us to do so (and in any event only where it is relevant to your product). We will not collect sensitive information about you where this is expressly prohibited by local law. Sensitive information includes information relating to:

- race
- political or religious beliefs
- sexual orientation and sexual life
- criminal convictions
- membership of professional or trade associations or unions
- biometric and health information
- information about your affiliation with certain organisations, such as professional associations.

3.2 Use and disclosure

How is personal information used?

Generally, we only use and disclose information for the purpose for which it was disclosed to us or related purposes which would reasonably be expected. Those purposes include:

1. to establish and administer an investor's investment account and their relationship with us;
2. for communication purposes;
3. to enable us to provide information about new and existing products and services that will enhance our relationship with the relevant parties. However, we do respect the right of individuals to ask us not to do this;
4. to conduct analysis about our products and services to enhance our service offering;
5. to comply with our record-keeping, reporting, and tax obligations;
6. to protect legal rights and comply with legal obligations;

7. to prevent fraud and abuse; and
8. to handle any relevant enquiries or complaints.

We may also, from time to time, use your personal information (excluding sensitive information) for the purposes of direct marketing to you. Generally, we will only provide you with direct marketing if you have consented for us to do so, and you are able to opt out of receiving direct marketing from us at any time by contacting your financial adviser.

Who may we disclose your information to?

Required by law

We may be required by law to disclose personal information. For instance, we may be required to provide details to:

- Australian Government regulators such as the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulatory Authority (APRA) Australian Tax Office (ATO), Australian Transaction Reports and Analysis Centre (AUSTRAC) and to other regulatory or government entities;
- Australian Financial Complaints Authority (AFCA)
- Superannuation Complaints Tribunal (SCT);
- as required by a court order;
- to other regulatory or governmental entities outside of Australia as may be required; and
- your Spouse in accordance with the Family Law Act requirements.

Account administration

In order to meet our investors' needs and provide some investor services, such as administration of accounts and mailing of investor distribution statements, it may be necessary to release information or provide access to external service providers, for instance:

- any organisations including, involved in providing, managing or administering our products systems or services such as administrators, mail houses and software and information technology providers;
- auditors, consultants and other professional advisers;
- authorised financial advisers;
- a Legal Personal Representative, attorney or any other person who may be entitled to receive the proceeds from a deceased investor's account balance and any person contacted to assist us in that process;
- other financial institutions who hold an account in an investor's name, for example, where amounts have been transferred to or from that account;
- authorities investigating (or who could potentially investigate) alleged fraudulent or suspicious transactions in relation to an investor's account.

3.3 Information quality & security

MCG Wealth Management relies on the accuracy of the personal information provided. We aim to ensure that it is accurate, up to date and complete. If any of your details change or you have any concerns regarding its accuracy you should contact us.

We take steps to protect personal information from unauthorised access, modification, and disclosure including requiring use of passwords, user logins, or other security procedures. Developments in security and encryption technology will be reviewed regularly.

Where necessary, we will remind our clients that the Internet is an insecure medium.

3.4 Access to & correction of information

You may request access to any personal information we hold about you. Generally, if it is incorrect, we will correct it at your request. However, this is subject to some exceptions allowed by law, for example:

- if access to information would pose a serious threat to the life or health of an individual;
- if access to information would have an unreasonable impact on the privacy of others;
- if the request is frivolous or vexatious;
- if the information relates to a commercially sensitive decision-making process;
- if providing access would be unlawful;
- if access would prejudice enforcement activities relating to criminal activities and other breaches of revenue, or a security function;
- if providing access would reveal the intentions of MCG Wealth Management in relation to negotiations with you in such a way to prejudice those negotiations;
- if there are legal dispute resolution proceedings;
- where a third party has given us health information about you in confidence;
- denying access is required or authorised by or under law.

If access is denied we will provide you with the reason why.

Your rights if you are in the EU

As provided for in the General Data Protection Regulation, you have the right to access your data; to correct or rectify your data; to delete your data subject to applicable law; to have your data processed only in accordance with applicable law; to have copies of your data to be moved to another controller; to object to our processing your data otherwise than in accordance with the law; and to withdraw any consent to our processing your data at any time. Please email info@mcgwealth.com.au to exercise any of those rights.

Contact us

If you have any further questions relating to this privacy statement, wish to request access to personal information we hold about you, or have concerns about the way in which we have handled your personal information, please do not hesitate to contact us:

MCG Wealth Management
Suite 6, Level 1, Lingate House
409-411 New South Head Road
Double Bay, NSW, 2028
Ph: +61 2 9327 7395

Complaints about privacy

If you are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint.

Contact 02 9327 7395 or info@mcgwealth.com.au

We will acknowledge receipt of a complaint immediately, however, where this is not possible, acknowledgement will be made as soon as practicable. We will then investigate the complaint and

respond to you within 45 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution.

If you are not fully satisfied with our response, you can contact an external body. In cases of privacy related complaints, this is generally the Office of the Australian Information Commissioner (OAIC).

The contact details for OAIC are: Mail GPO Box 5218 Sydney NSW 2001 Phone 1300 363 992 Email enquiries@oaic.gov.au Online www.oaic.gov.au

You may also direct privacy complaints related to financial advice to the Australian Financial Complaints Authority (AFCA). The contact details for AFCA are: Mail GPO Box 3, Melbourne, VIC 3001 Phone 1800 931 678 Email info@afca.org.au Online www.afca.org.au.

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