

# Privacy Policy

August 2025

Privacy Policy

This document contains confidential and proprietary information intended for the specified recipients.

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## **Our Privacy Arrangements**

### ***Who we are***

We are Links Licensee Services Pty Ltd, ABN (97 678 975 589) an Australian Financial Services Licence (700012), and Links Wealth Management (55 681 041 538).

Links Wealth Management Pty Ltd

Suite 10, 18 Karalta Lane

Erina NSW 2250

These entities are collectively referred to in this document as Links.

### ***What is the purpose of this policy?***

This policy provides you with information about:

- The personal information that Links Licensee Services Pty Ltd collects about you
- How we handle your information, including how we use, disclose and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information.

As a business operating in Australia, we are required to adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), which regulate the collection, storage, use, and disclosure of personal and sensitive information. In addition, they also give individuals the right to access and correct any personal information that we have collected about them.

### ***What information do we collect, and why?***

We only collect personal information that is required for us to provide financial services to you and to satisfy our own legal obligations as the holder of an Australian Financial Services Licence. Typically, we will collect this information directly from you, using a combination of meetings and questionnaires, or via our website where you send a request that includes personal information. We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

We do not utilise any standard personal identification reference numbers (such as Tax File, Medicare or Centrelink numbers) as identifiers.

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The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original or certified copy of your drivers' licence, passport or other primary identification,
- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances, and
- Information about your financial needs, goals and objectives.

It is important that you provide us with complete and accurate information, as we use this to develop appropriate strategies and research suitable financial products that suit you. While we will take all reasonable steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you choose to give us incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

#### ***How will your information be stored?***

We store all personal information in electronic format in facilities we own, or in secure cloud-based storage. Hard copy paper files are stored securely with access restricted only to those staff who require your information to provide our financial services.

We maintain high data security standards to reduce the risk of unauthorised access to your information. However, should a data breach occur, we will contact you to notify you of the information that was compromised. In certain data breach situations, we will also be required to report to the Office of the Australian Information Commissioner.

Any original documents given to us will be returned to you after we have scanned them. We are required to retain most records for at least 7 years, or longer where legally required.

#### ***How will we use and disclose your information?***

We only use and disclose your personal information for the purpose of providing you with financial services, to carry on our financial services business compliantly and to seek legal advice about our affairs.

The information we collect will be used to develop an appropriate financial strategy to achieve your short, medium and long-term goals, and determine which financial products (if any) should be acquired or replaced. Our support staff and outsourced contractors will have access to this information as required to assist with the development of your financial strategy.

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Where we accept your instruction to acquire a financial product, we will disclose your relevant personal information to the financial product issuer.

We may also disclose your information to other third parties where required to deliver our financial services to you, or as required by law. These parties include issuers of financial products, life risk insurers, outsourced service providers such as paraplanning, administration support, auditors, accountants, or quality assurance. In some instances, these providers may be based overseas. We currently have an outsourcing arrangements that store data in the Philippines.

Where your information is shared with a third party outside Australia, we will take reasonable steps to satisfy ourselves the third party has arrangements to comply with the Australian Privacy Principles.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

***How can you access or correct the information we hold about you?***

We will take reasonable steps to ensure that the personal information we hold about you is accurate, up to date, relevant and complete, including when it is used or disclosed. If you identify inaccuracies with the information we hold, or there are changes to your circumstances, you can contact us to correct or update the information we hold. If we do not agree with your corrections, we may refuse to update the personal information, in which case we will provide you with a written explanation as to why.

The Privacy Act allows you to seek access to your personal information. To request access, please contact our Privacy Officer at [tyrone@linkswellth.com.au](mailto:tyrone@linkswellth.com.au). There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

***How can you complaint about our handling of your information?***

If you have a complaint about how we have collected, used or stored your personal information, you can direct your complaint to our Complaints Manager at [tyrone@linkswellth.com.au](mailto:tyrone@linkswellth.com.au). Alternatively, you may contact the Office of the Australian Information Commissioner by submitting a complaint through their [online form](#), or by contacting them at:

Privacy Complaints  
GPO Box 5288  
Sydney NSW 2001

Phone: 1300 363 992  
Fax: 02 6123 5145.

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1. We, Links Licensee Services, Australian Financial Services Licence 700012, our related entities and any agent(s) acting on our behalf (Us/We), request your consent to collect, use, disclose and store your personal information for the purposes of Us considering your suitability for employment / authorisation by Us in relation to:
    - a) complying with the ASIC Reference Checking and Information Sharing Protocol under the ASIC Corporations and Credit (Reference Checking and Information Sharing Protocol) Instrument 2024/647 (the Protocol);
    - b) should You be employed or authorised by Us—complying with the general conduct obligations of a licensee under section 912A of the Corporations Act 2001 or subsection 47(1) of the National Consumer Credit Protection Act 2009 which include, taking steps to ensure that a licensee’s representatives comply with financial services laws or credit legislation and ensuring that representatives are adequately trained, and are competent, to provide financial services or credit activities.
  2. The personal information (Information) that may be collected, used, disclosed and stored by Us is likely to include, but is not limited to, information in relation to:
    - a) the scope and length of your employment or authorisation;
    - b) your compliance audit record, including the results or outcomes of compliance audits;
    - c) the circumstances surrounding your departure from the licensee
    - d) compensation that was given to a client either as a financial payment offered to a client or any other non-financial remedy given to a client, as a result of your activities;
    - e) ASIC reportable breaches caused or contributed to by You;
    - f) details of written warnings or reprimands relating to You, given by ASIC or the Financial Services and Credit Panel to a financial services licensee under subsection 921S(2) or 921T(2) of the *Corporations Act 2001*, or instruments given by the Financial Services and Credit Panel to a financial services licensee under subsection 921M(1) of the *Corporations Act 2001*;
    - g) your conduct in relation to financial services or credit activities while you were employed or authorised by, and circumstances surrounding your departure from, the referee licensee;
    - h) details of any unresolved inquiry or investigation concerning your conduct in progress at the time that the reference is given;

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- i) any clarification or updates relating to the matters reported in the reference for a period of up to 6 months commencing after the day on which the reference is given.
3. We will collect this Information from referee licensees, being one or more of the current and/or former licensees to whom You were/are a representative in the preceding 5 years and only in relation to the 5-year period preceding the day the reference was given.
4. Information collected by Us will be collected, used, disclosed and stored by Us for the purposes described above, unless use or disclosure is required or authorised by law, including the Privacy Act 1988 (Cth), or You consent to the collection, use, disclosure or storage for a different purpose.
5. Information collected by Us will be collected, used and disclosed for a period of 12 months commencing after the day You give consent, for the purposes described above, unless You have notified Us in writing that You withdraw this Consent. Unless it is withdrawn earlier, this Consent will cease at the end of that 12 month period.
6. Information collected by Us will be stored for 7 years in accordance with the Protocol.

**Declaration of Prospective Representative**

I declare that I have read and understood the content of this consent form and consent to the collection, use and disclosure of this Information for a period of up to 12 months by Links or until you are notified in writing that I have withdrawn it, whichever occur earlier.

I acknowledge that the defence of qualified privilege applies when a referee licensee shares Information about a representative in accordance with the Protocol. Licensees have a defence of qualified privilege against a defamation action or a breach of confidence action resulting from information shared about a representative in the course of complying with their obligations under the Protocol.

Note: This defence does not apply to any information a referee licensee shares with Us that they are not obliged to give under the Protocol (e.g. information about conduct that occurred more than 5 years before the reference was given or information that is additional to that required under the Protocol, including any further background checking we may undertake on You).

I understand that the Information collected will be stored for 7 years in accordance with the Protocol.