



Clan Capital Management ('Clan') is committed to protecting and respecting your privacy and the privacy of personal information you supply to us. The purpose of this privacy policy is to set out the information handling practices of Clan.

Our contact details are:

Office Address: 45 George Street, Norwood, SA, 5067
Phone: 08 8334 2450
Fax: 08 8364 3418
Postal address: PO Box 3095, Norwood, SA, 5067
Internet address: www.clancm.com.au
Email: admin@clancm.com.au

About this Policy: We are bound by the Australian Privacy Principles from the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988. In addition to this policy, we will on occasions provide you with specific notice about how we use particular information that we collect from you. We may review and amend the information contained in this privacy policy from time to time. You should ensure that you have obtained the most recent version of this privacy policy.

Why we collect your personal information: Our ability to provide clients with a comprehensive financial planning and advice service is dependent on obtaining certain relevant personal information about you. We cannot act on behalf of clients who do not provide us with sufficient information to assess their relevant financial planning requirements.

We respect your personal details: At all times your personal information is treated as confidential. Our commitment to protecting your privacy means that, amongst other things, in the process of collection, storage, accuracy, use and disclosure of your personal information, your privacy is respected.

Collection of Information: Clan may collect personal information from you in person, in writing, by telephone, through our website and by email. We will only collect personal information from you by lawful and fair means, without being unreasonably intrusive. Wherever practicable we will collect personal information from you directly. As a client, you will provide much of the information when you engage us to act on your behalf. However, at times it may be more practicable for us to collect personal information from a third party. We will inform you if we do so, and obtain an assurance from the third party that they are authorised to provide the information.

The type of information we collect from you depends on the type of product or service you request but it may include:

- current personal and financial circumstances including name and contact details, gender, assets and liabilities, income, expenditure, insurance cover, superannuation, employment details and history, family structure and Centrelink eligibility;
- transaction information relating to investment products or services, such as details of contributions and distributions;
- your age and retirement plans.
- health information;

You may choose not to give us your personal information. Depending on the type of information you withhold, we may not be able to provide advice, let you invest or transact or deal with your investment.

We use your personal information to:

- prepare your financial plan;
- process applications and respond to your queries;
- correspond with you;
- administer and manage the products or services we provide to you;
- facilitate our internal business operations, including fulfilling our obligations under the law;
- provide accurate financial advice to you.

Disclosure of your personal information: Clan may disclose your personal information to other companies to assist us in administering your investments or provide you with other products and services.

There are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office); or
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests).

We will also disclose your information if you give your consent.

Security and Storage of Information: Personal information is stored on our computer system requiring logins and passwords or in hard copy stored in our offices. We have taken all reasonable steps to protect the information we hold from unauthorised access, modification or disclosure. There is a confidentiality requirement for all Clan Capital Management employees.

In the event you cease to be a client of Clan Capital Management, any personal information that we hold about you will be held for a period of 7 years in order to comply with legislative and professional requirements. After the end of this period the information held may be de-identified and all files destroyed.

Email policy: By authorising us to communicate with you via email, you authorise us to act on any instructions or apparent instructions without enquiring as to the identity of the sender. If your instructions are ambiguous, incomplete or unclear, we are under no obligation to act on such instructions. We will not be liable for any cost, expenses, loss or damage which you may suffer or incur in connection with any action taken or omitted by us in following any email instructions from you. You are responsible for and must take all reasonable care to ensure that the information you supply to us is accurate. When we correspond with you by email, our messages are not encrypted and may potentially be accessed by unauthorised persons or organisations.

Accuracy: We rely on the accuracy of the information you provide. If you think that we hold information about you that is incorrect, incomplete or out of date please contact us. Where it is established that information we hold about you is inaccurate or out of date, we will take all steps necessary to correct it.

Access: You are generally entitled to review the personal information we hold about you. If you wish to access your personal information please contact us. For security reasons, we require you to complete our 'Request to Access Information Form'. Once the Privacy Officer receives a signed request form and there is no reason for access to be refused, we will make arrangements to give you access to the information.

We reserve the right to charge a fee for the reasonable costs incurred in locating and providing access to your information. If we propose to charge a fee for giving access, we will provide you with an estimate of the fee so you can confirm that you still want access to the information. We do not charge a fee for lodging a request for access.

We will try to provide you with the information you request within a reasonable time period. This will depend upon the type of information to which you request access.

In certain circumstances, we may refuse you access to personal information we hold about you. For example, if giving you access would unreasonably interfere with the privacy of others or would reveal confidential details of in-house formulae or valuation processes. If we do not provide you access to your information, we will give you reasons for our decision.

Complaints process: We have a formal complaint handling policy. If you wish to make a complaint about a possible breach of privacy, you should contact us at:

Clan Capital Management
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Norwood SA 5067
Tel: 08 8334 2450
E: admin@clancm.com.au