

Financial Services Guide



AFSL & ACL No. 244565 | ABN 54 007 375 420
As AFSL Licensee for Hayes Girling Financial

Important Document:

At Security National Financial Services (Security National) we aim to make you feel totally at ease with the services we offer. Our value proposition is peace of mind. Our Financial Services and Credit Guide (FSG) is designed to answer frequently asked questions and to assist you in deciding whether or not to use any of the services offered in the Guide.

It provides you with information about:

- who we are and how we can be contacted
- the products and services we are authorised to provide you
- documents you may receive from your adviser
- financial services we are authorised to provide
- how we are remunerated
- the relationship between Security national and your adviser
- any potential conflicts of interest
- our internal and external complaints handling procedures
- the compensation arrangements we have in place
- privacy

Our contact details:

Security National Financial Services Pty Ltd

Address: Suite 12.02, Level 12, 484 St Kilda Road Melbourne VIC 3004

Postal Address: PO Box 6160 St Kilda Rd Melbourne VIC 3004

P. 03 9867 2511

F. 03 9867 4811

www.secnat.com.au

This document and your adviser's profile give you information about your Australian Financial Services License and Credit License, your adviser and the services that we offer. It is a requirement that we hand you this document for your perusal prior to providing you with any of our financial services.

Non-Independent Statement

Security National Financial Services Pty. Ltd. Do not claim to be independent under the Corporations Act definition as we may receive commissions from life insurance products we provide advice on and place on behalf of clients, from time to time. We do not feel that this impact on the advice provided to clients, as all insurance companies have the same commission caps.

Frequently Asked Questions

Our Vision

In today's competitive environment, business relationships are founded on professionalism, integrity and exceptional client service. These are the principles upon which Security National is founded. In our dealings with clients, Security National and its Representatives are professional, trustworthy and provide excellence in service.

Who are we?

Established in 1991, Security National is a privately owned company with no affiliations to life offices or fund managers. With experienced and professional advisers providing quality financial services, Security National is able to deliver solutions in a wide range of areas relevant to financial planning including the following:

Financial Planning	Personal Budget Planning
Superannuation and Retirement Planning	Personal Wealth Creation
Estate Planning	Direct Investments
Risk Management	Life Insurance Advice
Social Security	Facilitate share trading
Gearing Strategies	Salary Packaging Advice
Personal Portfolio Monitoring	Redundancy Packaging
Tax Effective Strategies	Finance – Homes, Loans, Car leases, Commercial loans

Security National is an Australian Financial Services Licensee and is authorised to provide financial services including the provision of advice on a range of financial products as detailed on page 4.

We offer personalised ongoing services such as financial plan reviews, portfolio monitoring and client newsletters/seminars. Security National is distinguished by its commitment to personal service. Whether you've previously received financial services advice or not, Security National can help you develop solutions tailored to your circumstances. Security National is a Principal member of the Financial Advice Association Australia.

Security National holds Professional Indemnity Insurance for the activities conducted under our AFS and Credit Licenses as required by the Corporations Act 2001 (Cth) and National Consumer Credit Protection Act 2009 with a Limit of Liability of \$2,500,000 each and every claim and in the aggregate. Life Insurance is included in the above policy. Representatives are liable to hold and retain cover should they cease to work for us, but this cover maintains run-off for past and present insured's (as long as the policy is current).

Key information is provided in answer to the following questions. If you need more information or clarification, please ask us.

Security National authorises the distribution of this Financial Services Guide (FSG).

Questions you may have prior to receiving our services

Q. Who is my Financial Adviser?

A. Your adviser is an authorised representative of Security National. All information about your adviser including name, authorisation, qualifications, experience and other details are contained in the adviser's profile attached at the end of this guide.

Q. Who is responsible for the services I receive?

A. Security National is responsible for the services provided to you by our authorised representative, (or your adviser). Your adviser is a competent and experienced professional who will work with you to provide services including advice that is appropriate for your needs and circumstances. Your adviser will be acting on behalf of Security National when recommending solutions to suit your needs.

Q. What is the purpose of this FSG?

A. This document gives you information about Security National. It also contains details of the services we offer, our remuneration arrangements and potential conflicts of interest. It also outlines what to do if you have a complaint about our services and how we protect your personal information.

It must be read in conjunction with your financial adviser's profile outlining their qualifications, experience, contact details, authorisations and specific remuneration arrangements. If you'd like more information or clarification, please don't hesitate to contact us.

When we initially meet with you, you will also be asked to fill out a Client Data Collection form which, along with comprehensive discussions with your adviser, will form the basis for the advice given to you. Not completing these forms may result in advice that may not be appropriate for you. Unless our adviser has full knowledge of your personal objectives, current financial situation, needs and other relevant information, their advice may be limited and not appropriate for your circumstances. This information will be kept strictly confidential.

Should we provide you with advice and services, you must also be provided with other documentation including Statements of Advice (SoA) or Product Disclosure Documents (PDS).

- A SoA is a record of our recommendations that outlines the scope and basis of our advice, including the information on which we've relied, and clearly details any fees, relationships or other relevant factors that may have influenced our advice. This will be prepared for you initially with our original advice and its basis. Any subsequent or further advice may be provided in other documents (RoA - Record of Advice) or may be provided to you verbally depending on the circumstances.
- RoA (Record of Advice) will be provided where an SoA has already been given and additional related advice is required. This will take into account your relevant personal circumstances. You may receive this in written form or it will be kept on your file for seven years. Our practice is to send you a copy for your records. If there have been any *significant* changes to your circumstances or objectives we will need to prepare a new SoA as appropriate. Please advise us of any changes you think necessary.
- A PDS is designed to assist you in making an informed decision about financial products. Should your adviser make a recommendation to you about a particular product or offer to arrange the issue of a product, you will receive a PDS. It contains details of "cooling-off" periods and remuneration details.

It is important to receive and fully understand your SoA and PDS before you commit to any recommendations made to you. If you have not been provided with these documents, please consult with your adviser, or alternatively please contact us and we shall endeavour to provide you with these documents.

Q. What financial services are available to me?

A. Security National holds an Australian Financial Services Licence that allows us to deal in and provide advice for a broad range of financial products (listed below). Our approved portfolio of products is sourced from a variety of institutions and is selected according to external research results, quality and value for money and most importantly, our clients' needs.

- Deposit and Payment products
- Derivatives limited to old law securities options, contracts and warrants.
- Government debentures, stocks and bonds
- Life products including Annuities, Life insurance, Term, Income Protection, Trauma, Death & Total and Permanent Disability products.
- Managed investment schemes including unit trusts, investment bonds, property trusts, growth funds, balanced funds, indexed funds.
- Retirement Savings Account products
- Securities (Shares)
- Superannuation products and Self Managed Superannuation

As we are not permitted to provide legal or specialist taxation advice nor advice in relation to general insurance products we may guide you to seek external advice to meet those needs and objectives.

Your adviser may be authorised by Security National to provide only some of these services and act only in respect of some products. Their profile will set out the extent of their authorisations as well as their qualifications and experience.

Q: How can I provide instructions to you?

A. You may specify how to deliver instructions to your adviser. For example you are able to give your adviser instructions by telephone, email or other means.

Q. What levels of ongoing service are available to me?

A. Depending on your requirements, Security National can provide different levels of service. This may range from advice on a particular product class only to the preparation of a comprehensive SoA. Your adviser will explain the available levels of service together with the associated risks and fee options to enable you to decide the type of service you require.

Based on your circumstances your adviser will recommend an appropriate level of ongoing service.

Q. Will the advice I receive be appropriate for my personal circumstances?

A. Yes. Before your adviser recommends any investment solutions they will need to understand your personal circumstances including your individual investment objectives, financial situation and needs. Of course, you have the right not to share this information with your Adviser. In this case they may not be able to advise you at all or, if they do, are required to warn you of the possible consequences of not having all your information (eg the scope of the advice will be limited and may not address all of your needs and circumstances). You should consider any warning provided within the SoA (or otherwise given) carefully.

Q. What should I know about any risks associated with the solutions recommended?

A. Your Adviser will explain any significant risks associated with recommended solutions, as well as the risks associated with not acting on the recommended solutions. If they don't, you should ask them to explain the risks to you. The SoA and/or PDS provided will contain important information. Please be aware there are inherent risks associated with investing in financial markets.

Q. What are the costs associated with the services?

A. Security National has a flexible fee structure. The following types of remuneration (all explained below) may apply depending on the complexity of your financial requirements and our agreement with you. **Security National pays 100% of all fees and brokerage to advisers.** From this they pay fixed fees to us, which cover the services we must provide them as their licensee.

- 'Plan fee',
- 'Initial fees for service and/or initial establishment fees' and/or
- "Ongoing service fees and/or advice retainer".

All fees and charges will be discussed and disclosed to you prior to the commencement of any work and will be detailed in the SoA or alternatively disclosed to you as appropriate and in accordance with current regulatory requirements. In addition to the information detailed in this FSG, specific details of the proportion of remuneration that Security National retains and that which is received by each authorised representative is contained in the individual profiles for each adviser. Commissions are no longer paid.

Plan fee

Any **Plan fee** charged is intended to cover the costs involved in preparation of a SoA. including any credit assistance. Before we proceed to prepare a plan for you, any fee applicable will be explained to you. Hourly rates may be up to \$250 per hour (inclusive of GST) and the details of the fee levied by your adviser is explained in their profile also provided with this document.

Initial fees for service and/or initial establishment fees

This fee relates to the initial placement of financial, insurance or equities products and is paid to Security National by the product provider from funds you have invested. Alternatively, it may be rebated back to you. If rebated we will invoice you for any additional amount charged by your adviser for the initial placement of your investments. See the profile for each adviser for further details.

By way of example, the upfront fee for investment type financial products can range between 0% and 6% depending on the product provider, for example, for an investment of \$10,000 in an equity fund paying 4% plus GST initial fee, the upfront fee would be \$440.

The upfront commission for risk insurance sets commission caps at 60% of the premium in the first year of the policy.

Ongoing service fees i.e. "portfolio management and review fee" and/or retainer

These are fees that remunerate us for providing personalised ongoing service to you including the conduct of reviews, seminars and portfolio monitoring. Please refer to the profile for your adviser to ascertain their preferred methods of remuneration. Options available again are either receipt of ongoing fees or rebate of brokerage and instead a payment of service fees via invoice.

Ongoing service fee or retainer is payable by the product provider from funds you have invested in. It is paid annually for as long as the investment or policy remains in force. For Investment type financial products, on-going fees may range between .025% and 5% plus GST. For example on an investment of \$10,000 in an equity fund, paying 1.1% means \$110 per year.

The commission for risk insurance sets a maximum trailing commission of 20% of the premium in all subsequent years.

Alternatively, you can elect to have ongoing brokerage rebated back to you and an annual service fee charged by Security National which is payable monthly or quarterly. If rebated we will invoice you for this service fee. Your adviser may charge up to 1.32% pa of the amount of funds you have invested. An example of a 1.32% ongoing service fee for funds invested of \$100,000 would be \$1,320 including GST. If a fee for service is charged it will be agreed between you and your adviser on an annual basis.

Q. Are there any relationships that will influence your advice to me?

SNI Managed Account Service

We may receive a share of portfolio management fees from the SNI Managed Account Service as we sit on the investment committee and form part of the research function for this fund. The fees relate directly to individual portfolios and are not volume based. We will always ensure that our primary concern is the best interest of the client, and as such will only offer such product advice if it is in your best interest and appropriate. The Directors of SNFS are also Directors of SNI Managed Account Service. If we feel this service is in your best interest and we recommend it to you we will provide more detailed information about the relationship in your Statement of Advice Document.

Heritage Property Fund

We may receive a share of portfolio management fees from the Heritage Property Fund as we sit on the investment committee and form part of the research function for this fund. The fees relate directly to individual portfolios and are not volume based. We will always ensure that our primary concern is the best interest of the client, and as such will only offer such product advice if it is in your best interest and appropriate. The Directors of SNFS are also Directors of Heritage Property Fund. If we feel this product is in your best interest and we recommend it to you we will provide more detailed information about the relationship in your Statement of Advice Document.

Michael Ibbotson holds Victorian real estate agent license number 073338L, trading as Bond Street Real Estate (BSRE). BSRE provides residential and commercial real estate services. BSRE may assist clients of Security National to buy and sell property and will be remunerated accordingly. BSRE may also represent Heritage Property Fund or any unlisted property funds. in the sale process of commercial property assets and will be remunerated accordingly.

Security National is neither owned nor controlled by any financial product provider and our advice will always be suitable and appropriate for your needs and circumstances. While we may receive brokerage and benefits from product providers (which will be disclosed in your SoA (or alternative advice documentation) we do not consider that any fund manager, bank or insurance company is currently in a position to influence our advice to you.

Some arrangements in place currently include the following. Note that further details and the values of these benefits will be disclosed in your SoAs (or alternative advice documentation) and detailed in our Alternative Remuneration Register:

Navigator, Colonial First State, IOOF- Share of Administration fees

We may receive a share of administration fees from Navigator, CFS and IOOF – an amount which comes out of the platform provider's management fee. These amounts are based on the amount of funds invested with Navigator, CFS or IOOF but is not volume based. It may be rebated to clients /or included in our percentage fee structure of Security National, but it must be disclosed. Your SoA will detail this information. This payment might be used to assist to pay for adviser training, research and IT costs.

Back office support

We receive back office support from Associated Advisory Practices, a product provider in the form of compliance services and technical support.

Sponsorship

Our authorised representatives and staff may also attend practice development days, technical days, economic briefings and site visits of which all may be sponsored by fund managers, platform providers or dealers.

Shareholdings

Both the licensee and authorised representatives may hold shares in product providers and/or products on our approved product list. Where this is the case it will be disclosed to you in the SoA or alternative advice documentation provided. Options in IOOF shares only.

Gifts and other benefits

Other benefits in the form of lunches, tickets to sporting events (i.e. golf, tennis days) may be received by authorised representatives and/or staff of Security National from time to time.

You are entitled to obtain information about our Alternative Forms of Remuneration. Security National Alternative Remuneration Register is publicly available for inspection on request. A copy of the Register is to be provided to you within 7 days of the request date. This Register outlines any alternative forms of remuneration which are paid and received by Security National or our authorized representatives. The Conflict of Interest Register identifies any potential for conflict of interest. Registers are maintained by fund managers, IDPS (or platform) providers, authorized representatives and Australian Financial Services Licensees.

Q. What information is maintained in my file, and can I examine it?

A. Your adviser will maintain a record of your personal profile for 7 years, including details of your objectives, financial situation, financial needs and any other information relating to your specific financial position. They will also maintain records of any recommendations they make.

AML/CTF Act

Under Money-Laundering regulations, (AML/CTF Act 2006) steps must be taken by us to ascertain your identity and the identity of any beneficial owners of investments that you may make on their behalf. Please be aware that we will require a certified copy of your passport or drivers licence, OR a certified copy of your birth certificate and any current ATO or utility provider information (i.e. copy of electricity account) . This will be required when you fill out your Data Collection Form.

Q. Who can I talk to if I have a complaint about Security National's services?

If you have a concern or complaint about our service or if your experience with us hasn't met your expectations – we'd like you to tell us so we can find a resolution and quell your concerns.

Our commitment to you

We are committed to efficient and fair resolution of all complaints we receive. Any complaint will be treated with courtesy and respect and we will work quickly to investigate and resolve your concerns.

Fairness

The process we follow to resolve complaints is designed to be fair to you and the individual or organisation against which the complaint is made. Wherever possible we will make sure your complaint is investigated by staff not involved in the subject matter of the complaint.

No Charges

We will not charge a fee or any associated cost for lodgement of a complaint or to resolve a complaint.

Our complaint resolution process

Receive & assess

When we receive a complaint we read or listen carefully. We may ask further questions to check we understand your concerns.

Acknowledge

If we can't resolve your complaint within 2 business days we will write to you to acknowledge we have received it and let you know when we expect to provide you with a response.

Investigate

We gather information about your complaint from relevant areas. We may need to contact you for more details or to clarify important points.

We also investigate potential options available to resolve the complaint issues.

Our response

We review the information to work out a fair response to your complaint. We then write to you to confirm:-

- Our response to your complaint.
- The key information upon which our response is based.
- Any action we propose taking to resolve the complaint.

Please read our response and tell us if you believe it to be fair, if you want to provide additional information or if you would like to discuss it further.

Your review

If you agree to our response and the action proposed we may ask you to confirm this in writing before proceeding. Or, you may disagree with our response – please let us know what you are not happy with so we can consider fully your position. If you provide us with any additional information to consider we will review this also.

External review (if required)

If you don't accept our response you can refer to Australian Financial Complaints Authority (AFCA) - an external dispute resolution scheme able to review your complaint. Their contact details are:-

Australian Financial Complaints Authority (AFCA)
GPO Box 3,
Melbourne VIC 3001
Ph: 1800 931 678 Fax: 03 9613 6399

Please note that the Service will not consider complaints until we have had the opportunity to investigate and resolve your complaint directly with you.

If AFCA accepts your complaint, it will attempt to resolve the matter through conciliation, which involves assisting you and us to come to a mutual agreement. If conciliation is unsuccessful, the complaint is referred to an independent recommender for a non-binding determination.

If you are not satisfied with our response

Please tell us if you are not happy. That way we can work with you to resolve the complaint to your satisfaction.

Privacy at Security National.

Security National is committed to ensuring the privacy and security of your personal information in accordance with the principles of *The Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Privacy Act). You have a general right to examine the relevant contents of your file and you should have been provided with our privacy statement (included in this FSG), which details our approach to privacy. Should you wish to examine your file just ask your Adviser and they will make all necessary arrangements to provide you with relevant information.

Our goal is to maintain your confidence when handling any personal information.

We aim to protect your information using electronic, physical and procedural measures. Our staff is trained to respect the information and to handle it appropriately.

We give you the option of opting out of receiving product information, marketing, newsletters or material unrelated to your investments. Please advise us. We also ask you to sign a clause in the documentation which will allow us to share information with but not restricted to:

- fund managers as necessary
- accountants or tax agents
- solicitors
- life offices as necessary
- doctors if providing life insurance
- any potential organisations wishing to acquire part or all of our business.

You are entitled to access the information a company holds about you. Contact your adviser to request information or ring Security National on 9867 2511.

Please see our website or contact us for an updated copy of our full Privacy Policy.

Michael Ibbotson

Authorised Representative Number 276365

What can I do for you as your adviser?

I am an Authorised Representative of Security National Financial Services Pty Ltd, (Security National AFS Licensee 244565). I am authorised by Security National to provide financial services on the full range of financial products permitted under its AFS licence as detailed in the main document (FSG).

My educational qualifications and experience

Security National has been my family business for over 30 years founded by my parents Keith Lawson and Christina Ibbotson. I have been in the financial planning industry since 1999. Prior to joining Security National I was National Sales Manager at DKN, one of Australia's leading financial product providers. I am an Accredited Mortgage Consultant (AMC) and hold a Financial Planning Degree from RMIT. I am also an ASX ALPA adviser. I specialise in wealth creation strategies, insurance, finance, superannuation and retirement planning.

How Security National and I are paid -

Please refer to the Financial Services Guide provided with this adviser profile document for details of the possible forms of remuneration that we may receive.

Security National initially receives all remuneration for the financial services I provide (i.e. all monies are payable to Security National). From that remuneration, Security National pays 100% to me and I then pay a monthly Licensee service fee. I also pay to Security National a quarterly fee to cover some of my operating costs. The details of the amounts retained by Security National will be confirmed in any Statement of Advice or alternative advice document provided to you.

For **insurance related remuneration**, please refer to the FSG for details of the remuneration received in the form of initial and ongoing brokerage.

For **investment recommendations** (i.e. non-insurance) my preferred remuneration methods are:

For initial advice – a plan fee and a fee for service; and

For ongoing services (if you choose to proceed with the advice) – a portfolio management and review fee.

This is subject to agreement with you. All fees and charges will be discussed and disclosed to you prior to the commencement of any work and will be detailed in the SoA/ ROA or alternatively disclosed to you as is appropriate and in accordance with current regulatory requirements.

Any **Initial Fee for Service** payable is based on an hourly consultancy fee rate of \$220 per hour inclusive of GST. You may also be charged a **Plan (SoA) Preparation fee** at (\$220 per hour inclusive of GST) which can range between \$300 and \$3000 depending on the complexity and the time spent.

My preferred method of **ongoing payment is an annual Retainer, this is your portfolio management and review fee**. This can be between 1.1% and 2.2% including GST; however, I usually charge 1.1% of Funds under Advice (FUA), these are the invested funds I provide advice for and manage. For example, an investment of \$100,000 at 1.1% would attract an advice retainer of \$1,100 annually.

So, for initial and ongoing services (for non-insurance related advice), I do not generally accept initial fee but rely on the ongoing portfolio fees as described above. I may, however, take an initial fee (as explained in the FSG) where a fund manager product pays an initial brokerage from their management fees. In most cases this is not an extra cost to you.

Other Benefits, Interests or Associations

Apart from the details confirmed in the FSG, specifically the following apply to me:

Sponsorship

I, and my staff, may attend conferences, practice development days, technical days, economic briefings and site visits of which all may be sponsored by fund managers, platform providers or dealers. These benefits **do not** rely on volume based sales for qualification.

Shareholdings

I hold shares in IOOF.

How to find me

My offices are situated at SE 12.02/L12/484 St Kilda Rd, Melbourne. If you would like to make an appointment to discuss your financial needs and objectives in more detail, please contact me on 03 9867 2511. If you have any difficulties getting through to me please ask for Daniel McIntosh and Anthony Dalakouras, my Executive team, on the office number above.

As a professional financial services business, we are committed to acting efficiently, honestly and fairly.
we value your support and appreciate any feedback that will help us to meet your needs and expectations.

We have your best interests at heart.

Security National Financial Services Pty Ltd Privacy Policy

The privacy of your personal information has always been important to us at Security National Financial Services P/L (The Company). We are bound by The Australian Privacy Principles, (NPP) set out in The Privacy Amendment (Enhancing Privacy Protection) Act 2012 that governs confidential information that you provide to us. We are committed to supporting this and any other applicable laws affecting your personal information, including the AML/CTF Act 2006. This privacy policy outlines Security National Financial Services P/L policy on how we manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

Collecting Your Personal Information

Your personal information will be collected and held by Security National Financial Services P/L for the purpose providing you with the financial services you require. These will be provided by your financial adviser who is an authorised representative of Security National Financial Services P/L holder of an Australian Financial Services License number 244565. It will be used for the purposes of:

- Providing you with the financial services that you have requested;
- Meeting the AML/CTF identification and verification requirements;
- Managing our relationship with you (including providing up to date records)
- Contacting you about financial products and services in which you may be interested.
- Updating your records

To enable your financial adviser to provide you with financial services that are appropriate for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth, and those of your partner/dependant;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- information required under the AML/CTF Act 2006
- family circumstances and social security eligibility; and
- other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

Quality of Data

If it is reasonable and practicable we will only collect your personal information from you. Generally your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or via written material, email letter or fax. We may need to collect personal information from third parties such as your accountant. We will ask you to sign an authority to collect this data. The Corporations Act and the FPA Rules of Professional Conduct require us to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to you. If you elect not to provide this information it may affect the appropriateness and adequacy of our advice, and expose you to higher risks in respect of the recommendations made.

How Your Personal Information is Held

Your personal information is generally held in hard copy or network client files on a computer database. Your personal information may also be held in a secure archiving facility. We will take reasonable steps to ensure that the personal information that we hold is protected from misuse and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having a secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision to you of the financial services you have requested. The types of third parties that may be provided with your personal information are:

- Any other financial advisers, brokers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- Insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, broker, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer; (at your instruction)
- government authorities and other organisations when required by law; and
- other organisations that you have consented to your personal information being disclosed to.

Your personal information may also be used in connection with such purposes. We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a purpose that is related to the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.
- We may also use the information collected from you to provide you with direct marketing such as articles that may be of interest to you. Should you not wish to receive such information please advise us via the “contacting us” section of this policy.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles. We may also acquire information from external parties relating to the services you have authorised us to provide. (Accountant if advising on Mortgages, loans etc)

We will otherwise not transfer your personal information outside Australia or use, sell or disclose your personal information without your consent, unless permitted to do so under the Privacy Act or required to by law.

Accessing your Personal Information

You can gain access to your personal information that we hold upon request. This is subject to exceptions allowed by law. If we deny a request for access we will provide you with the reasons for this decision. To request access please contact us (see “Contacting us and Privacy Issues” below).

Correcting Your Personal Information

We endeavour to take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see “Contacting us and Privacy Issues” below) and provide us with evidence that it is not accurate, complete and up-to-date.

If we agree that the personal information requires correcting we will take all reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not doing so. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

Identifiers (Tax File numbers)

In some circumstances we are required to collect government identifiers, for example your tax file number. We will not use or disclose this information other than when required to do so by law or when consented to by you.

Sensitive Information

Without your consent for instance where information is provided by you for insurance or risk purposes, we will not collect sensitive information about you. Exceptions to this include where the information is required by law, or for the establishment exercise or defence of a legal claim.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us by contacting us on 03 9867 2511.

If you wish to complain about any breach or potential breach of the privacy policy or the Australian Privacy Principles, You should contact the Complaints Manager at Security National. You may also contact the Office of the Australian Information Commissioner who may investigate your concern further.

Disclaimer

In providing financial services to you, we have relied on information supplied to us, which, where reasonable, we have assumed to be correct. Whilst all reasonable efforts have been made to substantiate such information, no responsibility can be accepted if the Information is incorrect or inaccurate.