

# Privacy Policy

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**Issued by:** RJS Wealth Management Pty Ltd

RJS Wealth Management Pty Ltd ABN 24 156 207 126 is a corporate authorised representative (No. 438158) of Modoras Pty Ltd ABN 86 068 034 908. Modoras Pty Ltd is an Australian financial services and credit licence holder. (No. 233209). Modoras Pty Ltd is located at Level 3, 50-56 Sanders Street, Upper Mt Gravatt Queensland 4122.

# TABLE OF CONTENTS

Our commitment to you	3
Collection of personal information	4
Why do we collect your personal information?	4
What personal information do we collect and hold?	4
What 'sensitive information' do we collect and hold?	5
How do we collect personal information?	5
If you do not allow us to collect your personal information	5
Use and disclosure of personal information	6
Who do we disclose your personal information to?	6
Cross-border disclosures of personal information	7
Security of personal information	8
Accessing your personal information	8
Correction of personal information	9
How to make a complaint	9
About us	9
Contact us	11

**Our commitment to you** The following details relate to the Licensee of RJS Wealth Management, Modoras Pty Ltd. The Modoras Group ('Modoras', 'we', 'us', 'our') comprises of a number of entities that provide a full range of advice and services covering:

- wealth management
- accounting
- taxation
- business advisory
- credit assistance

For the full list of these entities, please see the 'About us' section below. Modoras is committed to respecting our clients' right to privacy and protecting their personal information. We adhere to the Privacy Act 1988 and the Australian Privacy Principles, which govern the standards, rights and obligations around:

- the collection, use and disclosure of personal information
- an organisation or agency's governance and accountability
- integrity and correction of personal information
- the rights of individuals to access their personal information

Our privacy policy applies to all our dealings with you — whether they're in-person, over the phone, in writing, or online. It applies to all the Modoras directors, managers, employees and representatives with whom you deal. We only collect personal information we reasonably require in order to provide you with the advice, services and/or products that you choose to engage in to achieve your financial, lifestyle and/or business goals; or if required or allowed by law.

The specific requirements regarding the handling of personal information may vary between Modoras's different business entities. These entities will typically only share your personal information with each other for the purpose for which it was collected.

## Collection of personal information

The Privacy Act defines 'personal information' as:

*Information or an opinion about an identified individual, or an individual who is reasonably identifiable:*

- a) Whether the information or opinion is true or not; and*
- b) Whether the information or opinion is recorded in a material form or not.*

## Why do we collect your personal information?

We collect personal information that is reasonably necessary for, or directly related to, our work. Our work involves providing our clients with the financial, accounting, tax and credit assistance, services and/or products that you choose to engage in with us.

This includes:

- providing financial advice
- placing financial products, including buying and selling shares
- purchasing, varying, or cancelling insurance products
- setting up and administering self-managed superannuation funds (SMSFs)
- assisting with ancillary services such as Centrelink
- delivering accounting and tax-agent advice
- supplying business advice and support

Furthermore, to comply with the Anti-Money Laundering and Counter Terrorism Financing Act, we're required to collect and verify certain 'know your customer' information to confirm a client's identity.

## What personal information do we collect and hold?

The type of personal information we collect will depend on the advice, services and /or products you request from us.

It can include and is not limited to your:

- contact details, including your name, address, phone number, and email address
- personal details, including your date of birth, marital status, medical history, employment details, and financial dependants
- tax file number
- current financial circumstances, including your income, expenditure, assets and liabilities
- financial needs and objectives
- willingness and ability to take risks (risk profile)
- insurance cover and superannuation
- estate-planning details, including your will and any powers of attorney
- details of other professionals you engage with

## What 'sensitive information' do we collect and hold?

The term 'personal information' encompasses a broad range of information, including 'sensitive information'. We may sometimes collect and hold sensitive information about you. Sensitive information includes information or an opinion about an individual's:

- race or ethnicity
- political opinions or associations
- religious or philosophical beliefs
- trade-union membership or associations
- sexual orientation or practices
- criminal record
- health or genetic information
- behavioural biometrics (a person's digital, physical and cognitive behaviour)

## How do we collect personal information?

We only collect your personal information by lawful and fair means.

Where practical, we'll collect the information from you personally and not from third parties.

Examples of the way we collect information directly from you include:

- face-to-face interviews
- video conferences
- telephone conversations
- emails
- text messages
- data-collection forms on our website
- web-browsing cookies
- information supplied via social media platforms

In situations where you would reasonably expect it and/or you've consented to it, we'll collect your personal information from third parties (e.g. accountants, solicitors, Centrelink, product providers).

## If you don't allow us to collect your personal information

The collection of personal information is critical to our ability to provide the financial, accounting, tax and credit assistance, services and products our clients choose to engage in with us. If you don't allow us to collect some or all of your relevant personal information, it's likely we'll be unable to provide advice, services and/or products to you.

## Use and disclosure of personal information

We 'use' your personal information when we:

- search our records for your personal information
- access and read the personal information we hold about you
- make a decision based on the personal information we hold about you
- pass your personal information from one part of our organisation to another

We 'disclose' your personal information when we give access to it, or show it to, another individual, organisation or agency.

### Primary and secondary purposes for using and disclosing personal information

Australian privacy law allows us to use or disclose your personal information for:

- the purpose for which it was collected (the **primary purpose**)
- a **secondary purpose**, if an exception applies (see below)

Our primary purpose for collecting your personal information is to provide you with the financial, accounting, tax and credit assistance, services and/or products that you choose to engage in with us.

We can't use or disclose your personal information for another reason (a secondary purpose) unless an exception applies. Exceptions include:

- you've consented to us using or disclosing your personal information for the secondary purpose (e.g. the provision of estate-planning advice)
- you would reasonably expect us to use or disclose your personal information for the secondary purpose, and the purpose is related to the primary purpose of collection (or, in the case of sensitive information, directly related to the primary purpose)
- we think it's reasonably necessary for enforcement-related activities carried out by, or on behalf of, an enforcement body (e.g. police, ASIC)
- it's required or authorised under an Australian law, or court or tribunal order

Examples of secondary purposes for which we may use or disclose your personal information include:

- identifying other services and products that may be of interest to you
- referring you to our related business entities
- conducting a professional quality-control review
- managing our business operations (e.g. maintaining our IT systems)

## Direct marketing

Another of the secondary purposes for which we may use your personal information is direct marketing to promote services and goods that may be of interest to you. Unless you tell us otherwise, we may send you marketing emails and/or messages. In accordance with the Spam Act, each of our marketing emails will contain an 'unsubscribe' option. Who do we disclose your personal information to? In the course of our work, we may disclose your personal information to one or more other parties, including:

- our representatives
- our related and associated business entities
- a person who helps facilitate the financial, accounting, tax and credit assistance and services we provide to you
- superannuation fund trustees
- insurers
- product providers for whom we act as an agent
- medical pre-assessment services (to determine life-insurance eligibility and terms)
- lenders and other affiliated credit providers (e.g. banks)
- external auditors
- if required or authorised to do so under law, our insurers, dispute-resolution organisations, law enforcement agencies, regulatory bodies, etc.
- other Australian financial services licensees (AFSLs) we do business with or are considering partnering with
- prospective entities or parties interested in acquiring all or part of our business

## Cross-border disclosures of personal information

We may disclose your personal information to service providers based overseas, including in:

- New Zealand
- United States
- United Kingdom
- Canada
- Spain
- Poland
- Indonesia
- Brazil
- Sri Lanka
- India
- China
- Philippines

They provide, among others, administration, bookkeeping, database management, information technology, software support and marketing services. Information is disclosed to them via secure internet connections. We take reasonable steps to ensure our overseas service providers adhere to the Australian Privacy Principles.

## Security of personal information

We take reasonable steps to protect your personal information from misuse, interference and loss, and unauthorised access, modification, or disclosure. The security steps we take and strategies we implement cover the following areas:

- governance, culture, and training
- internal practices, procedures, and systems
- information and communications technology (ICT) security
- third-party providers (including cloud computing)
- data breaches
- physical security
- destruction and de-identification
- standards

If we no longer need your personal information, we'll take reasonable steps to de-identify or destroy it. In the unlikely event your personal information is accessed or disclosed without authorisation or is lost, and the data breach is likely to result in serious harm, we'll notify you and the Office of the Australian Information Commissioner. If we notify you of a breach, we'll recommend steps you can take in response.

## Accessing your information

If you request it, we'll give you access to the personal information we hold about you (i.e. information in a record we have possession or control of).

We'll give you access in the manner you request (e.g. email, phone, in person, hard copy, electronic record) and within a reasonable timeframe. This timeframe will depend on the scope and clarity of your request, whether the information can be readily located and assembled, and whether consultation with you or other parties is required. Generally, the timeframe will not exceed 30 calendar days. If we give you access to your personal information, we may charge you for things like:

- staff costs in searching for, locating and retrieving the personal information, and deciding which personal information to provide to the individual
- staff costs in reproducing and sending the personal information
- costs of postage and/or materials in giving access

We'll inform you in advance of any charges and the likely amount. There are grounds on which an organisation can refuse to give access to personal information. For example, an organisation can refuse to give access if it would have an unreasonable impact on the privacy of other individuals.

## Correction of personal information

We take reasonable steps to ensure the personal information we collect is accurate, up-to-date, complete, relevant and not misleading. If we notice any erroneous information, we'll correct it. Similarly, if you become aware of any wrong information, you can ask us to correct it. Depending on the circumstances, we may ask you to verify your identity. We won't charge you for any corrections. If we find out we disclosed incorrect information to a third party, we'll contact them to ask them to correct it. If we disagree with any corrections you wish to make, we'll arrange for a statement from you to be added to your client file.

## How to make a complaint

If you think we've mishandled your personal information, please call our privacy officer on (07) 3219 2555. We'll do our best to resolve your issue immediately. If we can't, we'll investigate the matter further before giving you a response. If you're unhappy with our response or we take longer than 30 days to respond, you can lodge a complaint with the:

### Office of the Australian Information Commissioner (OAIC)

GPO Box 5288

Sydney NSW 2001

[www.oaic.gov.au](http://www.oaic.gov.au)

[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

1300 363 992

## About us

The companies and related business entities listed below are partially or wholly owned by or directly affiliated with the Modoras Group.

### Wealth

**Modoras Pty Ltd** (ABN 86 068 034 908) is an Australian financial services licensee (AFSL 233209) and Australian credit licensee (ACL 233209). The following 'corporate authorised representatives', are authorised to provide wealth advice under our licence. They in turn have sub-authorised individuals (directors and/or employees) to provide advice, service and assistance on the licensee's behalf.

- RJS Wealth Management Pty Ltd  
ABN 24 156 207 126
- Modoras Wealth Management (VIC) Pty Ltd  
ACN 145 368 869  
The trustee for Modoras Wealth Management (VIC) Unit Trust  
ABN 27 236 614 176
- Modoras Wealth Management (QLD) Pty Ltd  
ABN 66 623 115 668

- Modoras Wealth Management (SYD) Pty Ltd  
ABN 82 622 475 478

Modoras Pty Ltd also trades as **Modoras Asset Management** (MAM). MAM is the specialist investment advisory division of Modoras. It provides financial, capital market and investment analysis; portfolio design and construction; and portfolio management services. MAM sponsors the Modoras Asset Management Investment Series.

**Actocue Pty Ltd** (ABN 32 128 604 419) is an Australian financial services licensee (AFSL 323729) and Australian credit licensee (ACL 323729).

## Accounting , tax and audit

Accounting, tax and business advice and services are offered through the following tax agents and accounting companies:

- RJ Sanderson & Associates Pty Ltd  
ABN 71 060 299 783
- Modoras Accounting (QLD) Pty Ltd  
ABN 81 601 145 215
- Modoras Accounting (Gold Coast) Pty Ltd  
ABN 62 601 145 199
- Modoras Accounting (VIC) Pty Ltd  
ACN 145 368 850  
The trustee for Modoras Accounting (VIC)  
Unit Trust  
ABN 37 460 720 728
- Modoras Accounting (SYD) Pty Ltd  
ABN 18 622 475 521
- Modoras Audit & Assurance (SYD) Pty Ltd  
ABN 85 668 357 159
- SDJ Audit Pty Ltd  
ABN 11 624 245 334
- Crispin & Jeffrey Pty Ltd  
ABN 97 668 120 170
- Modoras Capital (SYD) Pty Ltd  
ABN 63 671 028 354  
a corporate authorised representative  
of Gabraltar Capital Pty Ltd  
ABN 65 610 194 986  
AFSL (493813)

## Credit assistance

The following companies are Australian credit licensees (ACL):

- RJS Loan Solutions Pty Ltd  
ABN 25 123 033 116  
ACL 393942
- Modoras Pty Ltd  
ABN 86 068 034 908  
ACL 233209
- FinancialLine Finance Pty Ltd  
ATF FinancialLine Finance Trust  
ABN 11 644 724 780
- Actocue Pty Ltd  
ABN 32 128 604 419  
ACL 323729
- M.Inv Services Pty Ltd  
ABN 72 695 459 280  
a credit representative of  
Connective Credit Services Pty Ltd  
ABN 51 143 651 496  
ACL (389328)

## Other services and related entities

- FinancialLine Pty Ltd  
(Technology services)  
ABN 28 104 193 857

**Banks Group Wealth Management Pty Ltd** (ABN 14 127 520 558) is an Australian financial services licensee (AFSL 496348). The following 'corporate authorised representatives' are authorised to provide wealth advice under the licence. They in turn have sub-authorised individuals (directors and/or employees) to provide advice, service and assistance on the licensee's behalf.

- BG Private Clients Pty Ltd  
ABN 72 621 816 466

### Contact us

For more information about this policy, please contact our privacy officer:

Email: [compliance@modoras.com](mailto:compliance@modoras.com)

Physical address: Level 3, 50–56 Sanders Street, Upper Mt Gravatt QLD 4122

Postal address: PO Box 6530, Upper Mt Gravatt QLD 4122

Phone: (07) 3219 2555.

Client	RJSWM Professional
Name:	Name:
Signature:	Signature:
Date:	Date:

By asking us to provide you with our services, you consent to the collection, use and disclosures to overseas recipients of the personal information you have provided to us for the purposes described above. This only needs to be signed if not in any other documents.

For more information about RJS, please visit  
**[www.rjsanderson.com.au](http://www.rjsanderson.com.au)**

# RJS WEALTH MANAGEMENT

 | [info@rjswm.com.au](mailto:info@rjswm.com.au)

 | [www.rjsanderson.com.au](http://www.rjsanderson.com.au)

 | 1300 27 28 29