Privacy Policy

Financial Systems Pty Ltd (ABN 19 105 216 340)
AFS License No: 241060
Address: Level 3, 73 Walker Street, North Sydney NSW 2060
Telephone: 02 8213 6000

Website: www.financialsystems.com.au Issued March 2019

Protecting your privacy

Your privacy is important to us and we know that how we collect, hold, deal with and protect your personal information is important to you.

Financial Systems Pty Limited, Trading As Hubb Financial, ("FINANCIAL SYSTEMS", "us" or "we") is committed to protecting your privacy. Please read this policy carefully as it sets out important information regarding how we collect, hold, use, disclose and protect your personal information in accordance with the Privacy Act 1988 (Cth).

Please visit our website regularly to review this policy as we update this policy from time to time.

About FINANCIAL SYSTEMS

FINANCIAL SYSTEMS is a Corporation which provides a range of financial services.

The financial services provided by FINANCIAL SYSTEMS are arranging and general advice in relation to the financial services available from FINANCIAL SYSTEMS.

We collect personal information about individuals. The type of information we collect will depend upon the products or services that we are providing, or proposing to provide, to you or another person or entity with whom you are connected or for which you are an office holder such as a director. We are also required to identify the beneficial owner of clients which means we may collect personal information about shareholders of our clients and the office holders of clients.

What are the main consequences for me if I do not provide my information?

You are not required to give us your information. However, if you do not give us your information (including your personal information) we may not be able to properly provide our services to you or your company.
What kinds of information do we collect?

To enable us to fulfil our responsibilities and otherwise provide our services to we need to collect certain information from certain individuals. The kinds of information and verification documents we collect include:

• Your name, address and contact details,

• Date of birth,

• Your gender,

• personal email addresses

The information requested will vary according to the information you supply to verify your identity and the nature of the financial products and services you are asking us to provide.

How do we use your information?

FINANCIAL SYSTEMS collects, holds, uses and discloses the personal information of individuals only for fulfilling its own business purposes

Additionally, we may collect, hold, use and disclose an individual's personal information so we can:

• identify you, conduct checks, understand your requirements, assess applications made by you, and set up, administer and manage our products and services;

• manage, train and develop our employees and representatives;

• comply with applicable laws both in Australia and overseas including (a) the Corporations Act; (b) the Anti-Money Laundering and Counter-Terrorism Financing Act; (c) Income Tax Assessment Acts, Tax Administration Act and A New Tax System (Goods and Services Tax) Act which may authorise or require us to collect your personal information;

• store and process data, develop, create and distribute software, process invoice data in electronic formats;

• develop and price our services;

• develop new services;

• conduct and improve our business and improve the user experience;

• manage our relationship with you;

• comply with our legal obligations and assist government and law enforcement agencies or regulators; and
• manage various risks we confront.

We may also share limited demographic and non-personally identifiable information with third-parties.

FINANCIAL SYSTEMS does not make any other use of this information without the consent of the individual unless required or permitted by applicable law.

How do we collect your information?

We collect personal information by various means including telephone, fax and through our website. We may also collect information through affiliated organisations, our staff and through our contracted agents and other third party service providers.

We may need to ask certain individuals such as directors (or others) further questions so we can properly deal with company inquiries and otherwise provide our services to the company. Wherever practicable, we will ask for the information directly but we will usually collect personal information about you from the company representative who must take reasonable steps to notify you (1) that we have done so, (2) the circumstances of the collection and (3) inform you where you can find/obtain a copy of the Privacy Policy.

How do we keep your information secure?

The security of all information we collect, hold and disclose is of paramount importance to us. We keep both hardcopy and electronic records on our premises and electronic systems as well as with trusted contracted agents and other third party service providers. We take reasonable steps to ensure personal information is secure, including:

• having training measures in place to ensure our staff understands our policies and how to protect your information;

• maintaining an up-to-date data management policy which applies to all employees who handle your information;

• maintaining the security of our premises and our systems (including by use of passwords, firewalls, virus scanning tools and other measures); and

• wherever practicable, not reasonably required for the provision and improvement of our services and not otherwise prohibited (including by law) only keeping your personal information for as long as is required.

Online Security

A number of methods to protect your personal information. When you submit sensitive information via the Web site, your information is encrypted (look for the padlock icon on your browser to verify security). Your information is transmitted on the secured portion of the Web site. Firewalls and Secure Socket Layering (SSL) technology among other methods used to prevent unauthorized access to your account information.
Moreover, when you provide your login and password to access customer-only areas, that information is encrypted during transmission. Remember, you should never share your password with anyone and you should change your password frequently. You can safely change your password online at any time by answering certain questions about you or requesting a temporary password and changing your password upon logging in.

**Who do we disclose your information to?**

Unless we are permitted or required to provide your information to others by law, by court order or to investigate suspected fraud or other unlawful activity or to investigate or prevent damage or injury to persons or property, your information will only be seen or used as specified in this policy including by:

- credit rating agencies and other institutions to verify your identity and credit situation;
- our external dispute resolution body in the case of a dispute;
- organisations that carry out functions on our behalf including mailing houses; researchers; data warehouses; administration or business management services; specialised data matching and trending service providers, consultants, auditors, marketing service providers, data and document management providers and collection agents;
- Australian regulatory bodies such as AUSTRAC, the ATO and ASIC;

**Information on data collection (statistical data)**

Other information that does not relate to an individual personally will be collected and used by FINANCIAL SYSTEMS and may be communicated to third parties. Statistical and demographic data contain no personal details that would make it possible to identify a specific individual.

**How can you access, update or correct your information?**

You are entitled under the Australian Privacy Act to access your personal information and to request that it be corrected or updated as need be.

You may change your personal information by contacting customer service at 1300 767 699 or by submitting the request in writing to:

Financial Systems Pty Limited  
Level 3, 73 Walker Street  
North Sydney NSW 2060

If you believe there are errors in our records about you, please let us know and we will be happy to investigate and (where reasonably practicable) correct any inaccuracies.

**How do I make a complaint?**
While we always endeavour to get things right, we accept that we can get things wrong. If you have a complaint regarding your privacy, you may make a complaint and we will investigate your concerns.

To make a complaint, please send details

**Via Post:** Level 3, 73 Walker Street, North Sydney NSW 2060

**Via Phone:** 1300 767 699

**Via Email:** info@hubb.com

If you are not satisfied with our handling of your complaint, you may complain to the Privacy Commissioner.

**Choice/Opt-out**

We will send you electronic marketing promotions. If you do not wish to continue to receive electronic marketing promotions from Financial Systems, you may opt-out of these communications sending us an e-mail to opt-out of marketing promotions.

**Links**

The Web site contains links to other Web sites. Please be aware that we are not responsible for the privacy or security practices of other Web sites. We encourage our users to be aware of when they leave the Web site and to read the privacy statements of each and every Web site that collects personal information. We also encourage you to review the Privacy Statements of our service providers available on their websites.