LIFESPAN
Financial Planning

Privacy Policy

Version 2.1 Effective 9 October 2026

Our Commitment

At Lifespan Financial Planning (Lifespan), we recognise that your privacy is very important. Our business is governed by legislation protecting your personal information, including the Privacy Act 1988 and the Australian Privacy Principles (APPs) Privacy Amendment (Enhancing Privacy Protection) Act 2012, which replace the National Privacy Principles established under the Privacy Amendment (Private Sector) Act 2000.

Our Privacy Policy sets out our commitment to the APPs and to protecting the privacy of the personal information that we hold. This Privacy Policy explains how we collect, use, disclose, and hold personal information and how to contact us if you have any queries about the personal information we hold about you.

We require all our staff (including our Authorised Representatives) to adopt our Privacy Policy.

A summary of the APPs is available by contacting our office or at the Office of the Australian Information Commissioner (OAIC) website, www.oaic.gov.au.

What is personal information?

“Personal Information” is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not. Examples include an individual’s name, address, contact number and email address.

“Sensitive information” is a special category of personal information. Sensitive information includes health information and information about an individual’s race or ethnic origin, philosophical beliefs, membership of a professional or trade association and membership of a trade union.

Anonymity and pseudonymity

You have the right to not identify yourself or use a pseudonym when dealing with Lifespan. However, in accordance with the Anti-money laundering and Know Your Client legislation set out in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*. if you elect to not identify yourself in respect of any financial services that we offer, we will not be able to assist you in those circumstances.

Collection

As a provider of financial services, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies you and/or contains information or an opinion about you. In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

(a) employment details and employment history;

(b) details of your financial needs and objectives;

(c) details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;

(d) details of your investment preferences and aversion or tolerance to risk;

(e) information about your employment history, employment circumstances, family commitments and social security eligibility; and

(f) health information (required for some types of insurance).

We generally will only collect sensitive information (e.g. health information) about you with your consent, unless we are otherwise required or authorised by or under law to do so.

If you provide us with personal information about another person, please make sure that you tell them about this Privacy Policy.

We are required pursuant to the following legislation to collect sufficient information to correctly identify our clients and ensure appropriate personal financial product advice is provided to them:

- Corporations Act 2001;
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006;
- Taxation Administration Act 1953;
- Australian Securities and Investments Commission Act 2001;

- Superannuation Guarantee (Administration) Act 1992; and
- Superannuation (Unclaimed Money and lost members) Act 1999.

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you.

Generally, collection of your personal information will be effected either through face-to-face interviews, over the telephone, by email or by way of an online client engagement form. Additional and/or updated personal information may be collected through one or more of those methods as required.

Information may be received from third parties such as accountants, solicitors or referring entities. This information will usually be information that we determined could have been collected from you directly. However, should we determine otherwise, and the information is not contained in a Commonwealth record, we will as soon as possible either destroy or de-identify the information provided it is lawful to do so.

Collection of Government Identifiers

Tax file numbers (TFN)

This section applies (in addition to the rest of this Privacy Policy) if we ask for, or collect, your TFN. We are authorised to collect the TFNs of clients under applicable taxation, personal assistance and superannuation laws, including the Income Tax Assessment Act 1936 (**Tax Laws**). The collection, use and disclosure of TFNs is regulated by applicable Tax Laws, the Privacy (Tax File Number) Rule made under the Privacy Act and the APPs. We only collect your TFN for purposes required or authorised by law, including for the purpose of reporting information to the Australian Taxation Office or to give you any TFN information that we may hold about you.

It is not an offence to withhold your TFN.

Medicare and other identifiers

The above also applies to Medicare details and other government identifiers (not including TFNs). Lifespan will only request that this information be provided if it is reasonably required for a purpose outlined in this Privacy Policy or as required by a government authority.

Use and disclosure

We will only collect, maintain and use Personal Information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial plan;

- the provision of financial planning advice to you;
- making securities and investment recommendations;
- reviewing your financial plan;
- reviewing securities and investment recommendations; and
- risk management.

We will not use or disclose Personal Information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- where you have consented to such disclosure; or
- where the APPs authorise such use or disclosure under law, in circumstances relating to public health and safety or in connection with certain operations by or on behalf of an enforcement body.

We are required under the rules of certain professional or industry bodies (including the Financial Advisers Association of Australia) to make certain information available for inspection by the professional or industry body on request to ensure ongoing compliance with professional standards. This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction and advice records and make those records available for inspection by the Australian Securities and Investments Commission (**ASIC**).

Direct Marketing

We may use the personal information collected from you so we can contact you with information about our products and services, special offers, promotions and events that may be of interest to you.

We may contact you by email, mail or telephone. You can let us know at any time if you no longer wish to receive these communications by contacting us (using the contact details at the end of this policy) or using the unsubscribe facility in our communications. It may take some time for any request made to be effected. We ask that you please allow 2 weeks for your request to be actioned.

Disclosures

Financial product providers

We may disclose your Personal Information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.

Agents and authorised representatives

In order to ensure that you receive a personal and tailored service, your Personal Information may be transferred to one of our agents or authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

Overseas recipients

Lifespan may also disclose personal information to overseas recipients. In most cases, the information will be disclosed in the course of our monitoring and supervision activities. These activities are requirements under *the Corporations Act 2001, but in some cases the disclosure may be for advice preparation and/or* administrative purposes. As at the date of this Privacy Policy, the location of any overseas recipients of personal information collected by Lifespan is listed in the Overseas Recipient Location Register, which forms part of this policy. If and when we disclose personal information to any recipient outside of Australia, we require the recipient to comply with the APPs (or equivalent/stricter privacy laws that apply in that country).

Sale of business

In the event of a sale of business, we may disclose personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made on a confidential basis and it will be a condition of that disclosure that no personal information will be mishandled or disclosed by the prospective buyer. If the sale of business proceeds, we will contact you to notify you that your personal information will be provided to the purchaser, and you will have the ability to opt-out of your personal information being provided to the purchaser.

Document security and storage

Your personal information is maintained securely and is generally held in your client file. Information may also be held in a computer database. We will seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure.

We may store your information in a cloud or other types of networked or electronic storage.

Access and correction

You may at any time request access to your personal information by contacting your adviser (our Authorised Representative) or the Privacy Officer. Lifespan will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information

requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will not provide you with access to your personal information if:

a) providing access would pose a serious threat to the life or health of a person;

b) providing access would have an unreasonable impact on the privacy of others;

c) the request for access is frivolous or vexatious;

d) the information related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;

e) providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;

f) providing access would be unlawful;

g) denying access is required or authorised by or under law; or

h) providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body request that access not be provided on the grounds of national security.

In the event we refuse access to your personal information, we will provide you with an explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any Personal Information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness, and we will correct the incorrect personal information within a reasonable period.

We will endeavour to respond to any request for access to personal information within a reasonable period, which will depend on the complexity of the information, the date the personal information was collected and the date of the request(s). If your request is urgent, we ask that you please indicate this clearly and direct your request to the Privacy Officer.

Information Collected Online

Lifespan's web site may contain links to other web sites whose operator may or may not adhere to a privacy policy or be governed by the APPs.

Our web site may use cookies which allow us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your Internet service provider should be able to assist you to set your preferences.

Privacy Complaints

This Privacy Policy and the legislation which governs it has been established to promote and protect your privacy rights. If you believe your personal information has been mishandled, there has been a breach of your privacy or you have any concerns about the manner in which we have collected your personal information, you may lodge a complaint directly with our Privacy Officer by contacting us on the details below. Your complaint will be thoroughly investigated and responded to within 30 calendar days. We endeavour to resolve all complaints and encourage our clients to resolve complaints directly with our organisation.

However, if you are not satisfied with our response, you can contact us to escalate your concerns or lodge a complaint with the Australian Information Commissioner by visiting www.oaic.gov.au, calling 1300 363 992 or by emailing enquiries@oaic.gov.au.

Changes to this privacy policy

From time to time, it may be necessary for us to review and revise our Privacy Policy. We may notify you about changes to this Privacy Policy by posting an updated version on our website. We encourage you to check our website from time to time to stay familiar with our latest Privacy Policy.

Contact us

If you have any further enquiries regarding privacy issues or require further information relating to our Privacy Policy, please contact our Privacy Officer.

Suite 4, Level 24, 1 Market Street Sydney 2000

PO Box Q1917, Queen Victoria Building NSW 1230 Telephone: (02) 9252 2000

Email: advice@lifespanfp.com.au

Additional privacy information

Further information on privacy in Australia may be obtained by visiting the website of the Australian Information Commissioner at www.oaic.gov.au