



# Financial Services Guide

**Version 3**

**Date: 5 October 2021**

# Important Information

## Financial Services Guide

This Financial Services Guide (FSG), is designed to clarify who we are and what we do, and to help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you;
- how we and our associates are paid and – any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. The Privacy Notification on page 15 is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us.

## Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA). This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the '**Contact us**' section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

## Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the '**Contact us**' section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (e.g. fax, email or letter) or another method agreed with us.

## Not Independent

The Godfrey Pembroke Group (Godfrey Pembroke) is not independent, impartial or unbiased because:

- we are a wholly owned subsidiary of IOOF Holdings Limited ABN 49 100 103 722 (IOOF) and part of the IOOF group of companies (IOOF Group), which issues a range of products that we may recommend to our clients; and
- we may receive commissions on life insurance products we recommend to our clients.

# About Us

## Who we are

The following financial advice specialists are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you:

**Paul Damien Trosti**

**Authorised Representative No. 333418**

The Financial Services that the above financial advice specialists offer are provided TaylorTrosti Pty Ltd, ABN 79 603 643 769 trading as TaylorTrosti, Authorised Representative (AR) No.1007582. Credit Representative No. 370254.

Your financial advice specialists are Representatives of and offer services on behalf of Godfrey Pembroke.

Godfrey Pembroke has authorised your financial advice specialists to provide you with this Financial Services Guide.

# About Godfrey Pembroke Group Pty Ltd

At Godfrey Pembroke Group Pty Ltd (Godfrey Pembroke) we pride ourselves on providing a comprehensive range of financial advice services. Our network of self-employed advisers bring specialist expertise, and they understand intimately how to manage complexity. The Godfrey Pembroke history is underpinned by unparalleled customer service and personal attention to our clients' needs.

Founded in 1981, Godfrey Pembroke is a network of self-employed financial advice specialists who have a long history of leading the industry in professionalism, trust and transparency. Our goal has remained the same – to provide high quality financial advice to help create, grow and protect our clients' wealth.

With a focus on the value of relationships and a deep expertise in addressing complex financial needs, Godfrey Pembroke continues to support advisers and advice businesses within their network as they deliver quality advice outcomes for advice clients.

Our financial advice specialists are representatives of Godfrey Pembroke Group Pty Ltd ABN 38 078 629 973 Australian Financial Services Licensee 245451, of The Bond, Level 3, 30 Hickson Road, Millers Point NSW 2000

## Our associations and relationships

Godfrey Pembroke is a subsidiary of the IOOF Group. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website ([www.moneysmart.gov.au/investing/financial-advice](http://www.moneysmart.gov.au/investing/financial-advice)).

Godfrey Pembroke financial advice specialists are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

We may recommend financial services and products issued, managed, or administered by companies within the IOOF Group or companies in which a shareholding is maintained by an IOOF Group member.

These include products and services issued, managed or operated by the following entities:

- MLC Investments Limited ABN 30 022 641 661 AFSL 230705 (branding includes 'Private Investment Consulting')
- JANA Investment Advisers Pty Ltd ABN 97 006 717 568 AFSL 230693
- NULIS Nominees (Australia) Limited ABN 80 008 515 633 AFSL 236465 as trustee for the MLC Super Fund ABN 70 732 426 024, and as trustee for the MLC Superannuation Fund ABN 40 022 701 955 (branding includes 'MLC' and 'Plum')
- Navigator Australia Limited ABN 45 006 302 987 AFSL 236466 (branding includes 'Pre Select Funds')
- Australian Executor Trustees Limited ABN 84 007 869 794 AFSL 240023
- IOOF Investment Services Limited ABN 80 007 350 405 AFSL 230703
- IOOF Investment Management Limited ABN 53 006 695 021 AFSL 230524
- IOOF Limited ABN 21 087 649 625 AFSL 230522
- Managed Portfolio Services Limited ABN 77 009 549 697 AFSL 233761
- OnePath Funds Management Limited ABN 21 003 002 800 AFSL 238342
- OnePath Custodians Pty Limited ABN 12 008 508 496 AFSL 238346
- Oasis Fund Management Limited ABN 38 106 045 050 AFSL 274331
- Antares Capital Partners Ltd ABN 85 066 081 114 AFSL 234483 (this includes as the issuer of the 'Altrinsic Global Equities Trust' co-branded 'Altrinsic Global Advisers' and 'a partner of MLC Asset Management')
- Fairview Equity Partners Pty Ltd ABN 45 131 426 938 AFSL 329052
- Intermede Investment Partners Limited ABN 89 562 707 527
- MLC Asset Management Services Limited ABN 44 106 427 472
- Presima Inc

If we recommend a product or service issued by an IOOF Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on Godfrey Pembroke's approved product list. These will include IOOF Group products, and products issued by National Australia Bank Limited and its related entities (NAB). We were previously authorised by a company in the NAB Group. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances, then we may recommend a product outside of this list.

At all times, we will ensure that our recommendations are in your best interests.

IOOF and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402 (MLC Limited) and OnePath Life Limited ABN 33 009 657 176 (OnePath Life). MLC Limited is part of the Nippon Life Insurance Group and OnePath Life is part of the Zurich Financial Services Group. MLC Limited and OnePath Life are not part of the IOOF Group.

## **What we do**

We are authorised by Godfrey Pembroke to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Superannuation
- Retirement Savings Accounts
- Securities
- Standard Margin Lending Facilities

## **Contact us**

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Suite 402, Level 4, 80 Elizabeth Street, Sydney NSW 2000

GPO Box 5433, Sydney NSW 2001

02 8024 8040

[service.team@taylortrosti.com.au](mailto:service.team@taylortrosti.com.au)

# Your confidence in our advice

Your satisfaction is of paramount importance to us and we have procedures in place to resolve any concerns promptly, and fairly.

## Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial advice specialist know in the first instance. You can also raise your complaint at any time by contacting us at:

IOOF Advice Complaints  
Level 3, 30 Hickson Road  
Millers Point NSW 2000

**Phone:** 1800 271 147

**Email:** [advicecomplaints@ioof.com.au](mailto:advicecomplaints@ioof.com.au)

2. If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

**Website:** [www.afca.org.au](http://www.afca.org.au)

**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Telephone:** 1800 931 678 (free call)

**In writing to:** Australian Financial Complaints Authority Limited

GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Godfrey Pembroke holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of financial advice specialists who were authorised by us at the time of your complaint but are no longer representatives of Godfrey Pembroke.

# Payments and benefits we receive

At Godfrey Pembroke we believe you deserve transparency and we want to ensure all our recommendations are driven by your needs alone. This is why Godfrey Pembroke has led the industry in implementing a fee-for-advice model (back in 2006), and we will continue to do so. This model allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based on:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- by direct invoice from us for initial and ongoing advice;
- in some circumstances, where possible, as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- where applicable, we may be paid a commission by the financial product issuer(s);
- where applicable, via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time. Please refer to the “**How we charge for our services**” section of this FSG for further information.

## Other payments we may receive

We will provide you with details of all fees, commissions, or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

## Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

### Conferences

Our financial advice specialists may attend conferences and professional development seminars that have a genuine education or training purpose. Godfrey Pembroke may pay for the costs of travel and accommodation, and events and functions held in conjunction with the conference or seminar.

### Non-monetary benefits

Godfrey Pembroke and your financial advice specialist maintain a public register outlining the alternative forms of remuneration that are payable to, and by us e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting your financial advice specialist. Please be aware that Godfrey Pembroke may charge you for the cost of providing this information to you.

### Sponsorship

Godfrey Pembroke receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and we do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

# Referrals

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

## Referrals to a third party

We have referral arrangements in place with third party providers. If we refer you to one of these providers we may receive a payment, fee, commission, or other benefit from those providers.

Details of these arrangements are set out in the table below and specific details of any referral payments we may receive will be provided in our advice documents to you. Alternatively, you can request further details about our referral arrangements prior to us providing you with financial advice.

**Table - Details of referral arrangements in place:**

Name of referral partner	Services	Payment we will receive for referral	Example
Housing Mortgage Services Pty Ltd	Mortgage Broking	50% of initial fee earned by the Mortgage Broker. 25% of trail commission earned by the Mortgage Broker.	<i>Loan:</i> If you established a loan for \$1,000,000 we would receive up to \$3,300 upfront and up to \$750 per annum thereafter.
Nectar	Mortgage Broking	Quality Lending Services will receive 40% of initial fee earned by the Mortgage Broker. 40% of trail commission earned by the Mortgage Broker.	<i>Loan:</i> If you established a loan for \$1,000,000 we would receive up to \$2,640 upfront and up to \$600 per annum thereafter.

Please note that Godfrey Pembroke is not responsible for the advice and services provided by these providers.



## Referrals to an associated entity or related third party

We may refer you to the following associated entities or related third parties and therefore may receive a direct or indirect benefit from any referral we make to this provider.

Details on these associated entities and related third parties are set out in the table below and specific details of any benefits we may receive from the referral will be provided in our advice documents to you. Alternatively, you can request further details about our associated entity and related third party arrangements prior to us providing you with financial advice.

We are obligated to act in your best interests when providing you with financial advice, as such we will be transparent and disclose any benefits we may receive via an associated entity or related third party in relation to our recommendations to you.

**Table – Other Business Activities, Associated Entities and Related Third Parties:**

Name of Entity	Nature of association
201 Professional Services Pty Ltd TaylorTrosti	Paul Trosti and Daniel Taylor are Directors of 201 Professional Services Pty Ltd and have a controlling shareholding in the entity. As a result, Paul Trosti and Daniel Taylor will receive dividends/distributions and/or income from 201 Professional Services Pty Ltd.
Quality Lending Services Pty Ltd	Paul Trosti and Daniel Taylor are Directors of Quality Lending Services Pty Ltd and Paul Trosti has a controlling shareholding in the entity. As a result, Paul Trosti and Daniel Taylor will receive dividends/distributions and/or income from Quality Lending Services Pty Ltd.
Quality Para Planning Pty Ltd	Paul Trosti is a Director of Quality Para Planning Pty Ltd

Please note that Godfrey Pembroke is not responsible for the advice and services provided by these providers.

## Death & TPD Succession/Estate planning

In the event of our death or permanent disablement, Godfrey Pembroke may acquire our client servicing rights. This helps manage the transition of ownership to ensure you continue to receive advice.

The value of any sale is based on an independent valuation of the business.

# How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

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<b>Initial Meeting</b>	<p>At our expense.</p> <p>Please allow 90 mins for the Initial Meeting which is held at our offices during business hours.</p> <p>During our initial meeting explore your current situation and continue discussions about what is most important to you.</p> <p>We will also provide you with an engagement agreement and explain how we can work together.</p> <p>If we both feel that we are a fit and that there is sufficient value in working together then we can proceed.</p> <p>If we are not a match, we will happily refer you to our network of colleagues and associates who may be better placed to work with you.</p>
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## Strategy Development

Strategy Development is the process of identifying what is most important to you then gathering the required information and developing financial models to provide you with the best options for you to achieve of what is most important to you.

We will work with you to develop a personalised strategy that will address the following areas:

### Cash flow and banking

Cash flow and banking addresses areas of advice in relation to budgeting, income planning and cash management including the most appropriate use of your surplus income, to ensure that you are on track to achieve what is most important to you.

We do this by;

- Reviewing your current cash flow within the framework of your banking facilities and tax structures;
- Carefully considering your cash flow requirements;
- Recommending amendments to and/or establishing a cash flow plan with specific cash hubs to collect and distribute funds for, loans, lifestyle and investment purposes.

### Debt & Debt Management

Debt Management describes how you deal with monies you owe. We will review issues such as borrowings, repayments, earnings, assets, liabilities and ownership. The influence of taxation on non-deductible (home, car, personal) and deductible (business, investment) debt will also be considered.

### Tax & Accounting

We will engage our accountants to develop a personalised tax and accounting plan for you by:

- Reviewing your current entities and ownership structures;
- Appraising your tax and accounting requirements;
- Recommending changes where necessary to ensure that your tax and accounting plan is aligned with your requirements efficiently and cost effectively.

**NOTE:** *We have referred you to our in-house accountants [tax agent no: 25300916] as we are not licensed to provide specific tax advice, even though we take these into consideration when reviewing your cashflow, debt and asset circumstances.*

### Investing

We will develop an investment plan for your current and future personal assets including:

- Review of your current investment strategy and asset allocation;
- Explore your aspirational risk profile;
- Recommending changes (where necessary) to your asset allocation and degree of diversification that ensure your investment portfolio is aligned with your lifestyle goals, risk tolerance and overall strategy.

We will schedule several meetings, emails and conversations during the Strategy Development Process, including:

1. Gaps, Options & Choices Meeting (described below)
2. Strategy Discussions & Advice (described below)

**Gaps, Options & Choices Meeting: (1 meeting, allow 2 hours)**

During the Gaps, Options & Choices Meeting we will finalise your current position as identified during the Initial Meeting.

We will also;

- Review your legal structures
- Note your banking structures and patterns
- Analyse your insurance requirements
- Discuss your investment risk profile
- Explore strategic options.

We will ask you to sign Insurance and Investment disclosures during the meeting. These disclosures include a starting point for insurance sums insured and a level of investment risk that we will use as assumptions when building a financial model in preparation for the Strategy Discussion and subsequent Advice.

**Strategy Discussions & Advice (1 - 2 meetings, allow up to 2 hours per meeting)**

During your Strategy Discussions, we will enable you to try recommendations on for comfort and fit before you give us the go ahead to conduct further detailed analysis and financial modelling required to prepare your comprehensive financial plan. We refer to this stage as your 'suit fitting'.

We'll then finalise your Strategy, which is essentially your comprehensive set of tailored recommendations specifically for you, that when implemented will provide you with the greatest probability of achieving your what is most important to you.

Strategy Development Process	Estimate
What is most important to you	
Information gathering	
Gaps, Options & Choices	
Initial Strategy Development & Final Strategy Presentation	
<b>Total (including GST)</b>	<b>Ranges between \$7,700 and \$16,500</b>
Upon engagement. Payable once from the entity to which the advice relates.	
Fees may be tax deductible, seek tax advice.	

**Implementation**  
(fee for advice)

Implementation is the process of putting in place the recommendations made during the Strategy Development Process.

Should you elect to proceed with our recommendations and engage us to implement these for you, the fees quoted in the Statement of Advice will apply.

## Annual Review & Update

The Annual Review & Update is the process of reviewing what is most important to you then confirming the required information and updating the financial models to provide you with the best options for you to achieve of what is most important to you.

We will work with you to review and update your personalised strategy that in two parts as follows:

### Update Call (allow 30 minutes)

During the Update Call we will check in on any updates since our last meeting, review several compliance related questions regarding financial products, changes for the year ahead and any concerns or issues you would like us to focus on during the Annual Review & Update.

### Annual Progress Meeting (allow 2 hours)

Compares your previous position against your current position, quantifying contributing factors and measuring your progress towards what is most important to you.

We will present you with a fee reconciliation for the completed year along with considerations and opportunities for the year ahead.

Annual Review & Update Fees	Per Engagement
<b>Annual Fee:</b>	<b>\$7,000</b>
Annual Review & Update including a review and recommendations for the following:	
1. Net Asset Growth	
2. Strategy progress	
3. Cash flow	
4. Insurance	
5. Super	
6. Estate Planning	
7. Tax	
8. One Statement of Advice or Record of Advice	
(Upon engagement. Payable monthly from the entity to which the advice relates. Fees may be tax deductible, seek tax advice).	
<b>Total (including GST)</b>	<b>Ranges between \$7,000 and \$27,500</b>

## Fixed Term Advice and Services Agreement

You can elect to enter into a 12-month Fixed Term Advice and Services Agreement (Agreement) as part of your financial planning strategy so you can receive advice services such as a meeting to review your plan. Details of the services will be set out in your Agreement.

The fee can range from a minimum of \$7,000 while the maximum is \$55,000 each year. The fee applied will be commensurate to the level of service needed and the complexity of the advice provided and will be outlined and agreed with you in the Agreement.

## Execution only service

Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off minimum of \$330 and a maximum of \$2,200 fee may apply.

## Insurance products

In the most part we do not receive commissions either directly or indirectly from any life insurance products.

However, in rare situations where it is in the clients' best interests to pay for our advice with insurance commissions an insurance company can pay commissions to us.

In these circumstances, where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
<b>Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)</b>	up to 130%	up to 33%
<b>From 1 January 2018</b>	up to 88%	up to 33%
<b>From 1 January 2019</b>	up to 77%	up to 33%
<b>From 1 January 2020</b>	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

**Example** (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.

# Privacy Notification

To give you appropriate advice, our financial advice specialists will need to ask you about your current financial situation, what you are looking to achieve and other personal information.

Without this information, your financial advice specialist may not be able to provide you with advice relevant to your circumstances.

## How we manage your personal information

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy.

If you would like more information, please refer to the IOOF Privacy Policy available at [www.ioof.com.au/privacy](http://www.ioof.com.au/privacy). You can also request a copy by calling your financial advice specialist or by writing to:

### Privacy Officer

Godfrey Pembroke Group Pty Ltd  
Locked Bag 4004  
Queen Victoria Building NSW 1230

## Collecting and using your personal information

We will collect and use your personal information (which may, if authorised and required, include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. We may also collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant, or other reliable identity verification service providers. We do this only if it's necessary to do so, for example where:

- we need information from an insurer about an insurance application you make through us; or
- at your request, we exchange information with your legal or financial advisers or other representatives.

If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

## What happens if you don't provide your information to us?

If you choose not to provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

## Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

## Disclosing your personal information

We may share your personal information (which may, if authorised and required, include your sensitive information, such as health information) with third parties for the purposes for which we are authorised to use your information.

This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including Godfrey Pembroke and other members of the IOOF Group, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;

- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee Godfrey Pembroke and other members of the IOOF Group;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities) where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia. Any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient complies with Australian privacy laws.

### **Marketing activity**

We presume you consent to being contacted by us (including Godfrey Pembroke and other members of the IOOF Group) may contact you from time to time on an ongoing basis about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the '**Contact us**' section of this FSG). We will process your request as soon as practicable.

### **Accessing or correcting your personal information**

You can ask us to correct, or to provide you with access to, information we hold about you. You can find out how to seek access to or the correction of your information by reading our Privacy Policy or by contacting us. Our Privacy Policy is available at [www.ioof.com.au/privacy](http://www.ioof.com.au/privacy) or you may request a copy from your financial advice specialist.

### **Complaints**

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (by contacting us) or by referring to the '**Your confidence in our advice**' section of this FSG.

### **Further information**

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the '**Contact us**' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at [oaic.gov.au](http://oaic.gov.au)