



Privacy Policy

Effective 13 May 2022

Neargold Pty Ltd ATF: Alan Klein Family Trust, trading as XL Planners is a Corporate Authorised Representative of Politis Investment Strategies (Authorised Representative Number 275078 ABN:24 652 094 693). Politis Investment Strategies Pty Ltd is the holder of Australian Financial Services License (AFSL Number 253125, ABN: 71 106 823 241)

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Introduction

Neargold Pty Ltd ATF: The Alan Klein Family Trust, trading as XL Planners is strongly committed to protecting your privacy. The purpose of this Privacy Policy is to tell you what kind of information we may gather about you, how we may use that information, whether we disclose it to anyone, and the choices you have regarding our use of, and your ability to correct this information.

We are bound by, and committed to supporting, the Australian Privacy Principles established under the Privacy Act 1988 as amended.

Privacy Policy

We are a Corporate Authorised Representative of Politis Investment Strategies (Authorised Representative Number 275078, ABN: 24 652 094 639). Politis Investment Strategies Pty Ltd is the holder of Australian Financial Services License (AFSL Number 253125, ABN: 71 106 823 241) and as such 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 ("personal information").

From time to time, it may be necessary for us to review and revise this policy. We reserve the right to change this policy at any time and may notify you of the change in writing.

Collecting Information

Our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you that might include:

- Your name, address and contact details
- Employment details and employment history
- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation
- Details of your personal financial needs and objectives
- Details of your investment preferences and aversion or tolerance to risk
- Medical, health and lifestyle information for risk insurance purposes

You may choose not to provide your personal information. If this is the case, depending on the nature and quality of the information you choose to withhold, we may not be able to provide you with advice or implement strategies entirely appropriate to your financial needs and objectives.

In case we are not able to collect sufficient information to ensure appropriate advice can be given, we may not be able to provide you with our services.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

Generally, collection of your personal information will be effected in either face to face interview, over the telephone or by way of a client information document or other service providers, agents, advisers, brokers, employers or family members. From time to time additional and/or updated personal information may be collected through one or more of those methods.

How we use your personal information

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.

We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you. In case you wish not to receive such material, you can contact us and request not to receive such information and we will give effect to that request. Please allow 2 weeks for your request to be actioned.

Disclosure of your personal information

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 of your information.

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

There are other circumstances under which we may disclose your personal information, for example when disclosure is required or authorised under law (e.g. disclosure to a government agency or where disclosure is necessary to protect our interests) or authorised by the Australian Privacy Principles.

We will not send your information overseas or hold data about you outside of Australia. Other third parties that we may disclose your information to from time to time might send your information overseas or hold data about you outside of Australia.

In order to ensure that you receive a personal and tailored service, your Personal Information might be transferred to one of our authorised representatives who will be your primary point of contact with the organisation. It is a condition of our agreement with each of our authorised representatives that they adopt and adhere to this privacy policy.

In the event that we propose to sell our business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is affected, we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

Security of your personal information

We keep your hard-copy or electronic records on our premises and systems or offsite using trusted third parties.

We will at all times seek to ensure that the personal information collected and held by us is treated as confidential and protected from unauthorised access, misuse, loss, modification or disclosure and have taken reasonable steps to secure your personal information.

By authorising us to communicate with you by e-mail, you are authorising us to act on any instructions without enquiring us to the identity of the sender. If your instructions are ambiguous, incomplete or unclear we are under no obligation to act on your instructions. When we correspond with you by e-mail, our messages are not encrypted and may potentially be accessed by unauthorised persons.

In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained electronically for a period of at least 7 years in order to comply with legislative and professional requirements, following which time the information will be destroyed.

Accessing your personal information

You may at any time request access to your personal information and we will reasonably 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 endeavour to respond to any request for access within 14 - 30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly.

There may be reasons to deny access, such as when your request may unreasonably impact upon another person's right to privacy. If your access is denied, we will provide you with the reasons.

When access is provided, we will require you to provide evidence of your identity and we may charge a fee based on the time spent retrieving, collating and producing the information. This fee will be disclosed to you at the time of your request.

Updating and correcting your personal information

We rely on the information you provide to us and we will endeavour to ensure that all your personal information we hold about you are 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 should contact us and provide us with details and evidence of the information that requires to be corrected. If we agree that the information requires correcting, we will take all reasonable steps to correct the information.

If we do not agree that your personal information requires correcting, we will provide you with a reason and take reasonable steps to ensure that whenever your personal information is accessed or handled in the future, it is apparent that you are objecting as to the accuracy or completeness of that information.

If you have any complaints

If you are concerned about the privacy of your information, or the way we manage your information, or this Privacy Policy and the Australian Privacy Principles, you should contact our office. Your complaint will be considered and responded to in accordance with our complaints handling procedure detailed in our Financial Services Guide.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner telephone 1300 363 992 who may investigate your complaint further.

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Neargold Pty Ltd
ATF: The Alan Klein Family Trust
Trading as, XL Planners
Suite 5, 97 Grafton Street
Bondi Junction NSW 2022

Postal Address
PO Box 123
VAUCLUSE NSW 2030

Contact
T: 02 8014 2164

alan.klein@xlplanners.com.au

Politis Investment Strategies Pty Ltd
1st Floor, NCYC Commercial Centre
91 Hannell Street
WICKHAM NSW 2293

Head Office Postal
PO Box 168, WICKHAM NSW 2293

Head Office Contact
T: (02) 4962 5525
F: (02) 4962 5526

reception@politis.com.au
www.politis.com.au