



PRIVACY NOTIFICATION STATEMENT (PNS)

Benton Asset Management Pty Ltd is committed to protecting the privacy of your personal information. This privacy policy outlines how we manage your personal information. It also sets out generally what sort of information we hold, for what purposes and how we collect, use and disclose that information. If after reading this document, you have any questions or need further clarification on any item, please contact our office.

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COLLECTING YOUR PERSONAL INFORMATION

As a financial planning organisation, we are required to comply with existing laws and regulations that govern the collection, holding, use and disclosure of your personal information. Our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including but not limited to:

- Name, contact details and date of birth
- Employment details and employment history
- Family commitments and social security eligibility
- Current financial situation: assets & liabilities, income, investments, expenditure, insurances & superannuation
- Investment preferences and tolerance to risk
- Current health and medical history and other sensitive information
- Tax File Number

You have the right not to provide this information if you do not wish to do so. However, failure to disclose the personal information referred to above may limit our ability to provide you with financial advice and recommendations appropriate to your circumstance and objectives, and may expose you to higher risks in respect of the recommendations made to you.

Generally, the collection of your personal information will be through face-to-face interviews, via the telephone or written material. 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. We will only collect, maintain and use personal information about you if it is necessary for us to provide the services you have requested, including:

- The preparation of your financial plan
- The maintenance and reviewing of your financial plan
- Making securities and investment recommendation
- Maintaining and reviewing the security and investments recommendations made to you



HOLDING YOUR PERSONAL INFORMATION

Your personal information is generally held in your client file(s) and/or a computer database. Your personal information may also be held in a secure achieving facility.

We will at all times take reasonable steps to ensure that your personal information held by Benton Asset Management Pty Ltd is protected from misuse and loss and from unauthorised access, modification and disclosure.

We will also take reasonable steps to destroy or de-identify personal information no longer needed for the purpose of identifying you or to provide you with financial planning advice and services.

In the event that you cease to be a client of Benton Asset Management Pty Ltd, your file will be held for a period of 7 years in order to comply with legislative and professional requirements, following which time the file will be destroyed.

USING AND DISCLOSING YOUR PERSONAL INFORMATION

From time to time, Benton Asset Management Pty Ltd may commission certain external organisations to assist in the provision of services to members (eg. mail-houses, auditors, lawyers and independent consultants who conduct research on member satisfaction). Benton Asset Management Pty Ltd provides members' names and contact details to such organisations, but only for the purpose of providing, administering or improving member benefits or services.

With the exception of the above, we will not use or disclose your personal information for any purpose other than:

- The primary purpose for which that information was collected or a purpose relating to the primary purpose for which that information was collected or a related secondary purpose
- Where you have consented to the use and disclosure
- in other circumstances where the National Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law

We are required under the Rules of Professional Conduct of the Financial Planning Association of Australia to make certain information available for inspection by the Association on request to ensure ongoing compliance with professional standards. The Corporations Act also requires us to maintain certain transaction records and to make those records available for inspection by the Australian Securities and Investment Commission.



We may also use the personal information collected from you for the purpose of providing you with direct and/or indirect marketing material for products that you may be interested in. You may, by contacting us, request not to receive such information.

Your personal information may be disclosed to the following organisation(s) for the purpose of giving effect to the financial plan and recommendation made by us:

- Other financial advisers, brokers and organisations involved in providing the financial advice you have requested (which may include ongoing service)
- Insurance providers, superannuation trustees and product issuers in connection with the financial advice you have requested
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other services;
- Your representatives or service providers such as your accountant, solicitor, tax agent, broker, stock broker or bank
- Organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer
- Government authorities and other organisations where required by law
- Organisations and/or individuals that you have consented to your personal information being disclosed to

ACCESSING YOUR PERSONAL INFORMATION

You may request access to your personal information at any time. Subject to the following exemptions, we will provide you with access by either providing you with copies of the information requested or by providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

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

- Providing access is unlawful
- Denying access is required or authorised by or under law
- Providing access would impact on the privacy of others
- The request is frivolous, vindictive and/or vexatious;
- Providing access would pose a health of life threat to any person

- The information is related to existing or anticipated legal proceedings and would not be discoverable in any such proceeding
- Providing access would limit in any way our ability to negotiate with you
- Providing access would likely prejudice certain operations by or on behalf of enforcement, bodies or an enforcement body requests that access not be provided.

In the event that a decision for access has been denied, we will provide you with an explanation for the refusal.

MAINTAINING ACCURACY AND CORRECTING YOUR PERSONAL INFORMATION

We will endeavour at all times to ensure that the personal information we hold about you is accurate, complete and up to date. In the event that you become aware, or believe, that the personal information we hold about you is not accurate, complete or up to date you may contact us and provide evidence that your personal information is not accurate, complete and up to date.


If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

COMPLAINTS ABOUT PRIVACY

If you wish to complain about a breach or potential breach of this privacy policy or the National Privacy Policies, you should contact our office and request that your complaint be directed to the Complaints Officer. Your complaint will be considered and a response provided within 7 working days. Where we are unable to resolve any complaint to your satisfaction you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

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