BARCHESTER
Financial Services

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Privacy Policy

Barchester Financial Services (ABN: 83 613 754 591) (we, us, our) is an Australian business and an Australian Financial Services Licensee (AFSL No.: 490348).

This Privacy Policy explains how we collect, hold, use and disclose personal information, including sensitive information and credit-related information (if applicable), and how you can access and correct your personal information or make a privacy complaint. We handle personal information in accordance with the ***Privacy Act 1988* (Cth)**, including the **Australian Privacy Principles (APPs)**.

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1. What is "personal information"?

"Personal information" means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.

Sensitive information includes information about health, biometric information, and certain other categories under the Privacy Act.

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2. The kinds of personal information we collect and hold

The types of personal information we may collect and hold include:

- **Identity and contact details**: name, date of birth, residential and postal address, email address, phone number.
- **Verification and compliance information**: copies of identification documents, verification outcomes, and records needed for regulatory compliance.
- **Financial and product information**: income details, assets and liabilities, insurance details, superannuation and investment information, account details, transaction details relevant to the advice or services.
- **Advice and service records**: information you provide for fact-finds, risk profiling, statements of advice, records of instructions, and communications (emails, call notes).
- **Website and device information** (where relevant): IP address, device identifiers, browser type, pages visited, cookies and similar technologies.

- **Audio/visual information** (where relevant): call recordings or meeting recordings (if we notify you and it is permitted by law).
- **Third-party information**: information about your spouse/partner, dependants, or other related parties, where you provide it or you are authorised to provide it.

We generally **do not** seek to collect sensitive information unless it is reasonably necessary for our functions and activities, we are permitted to collect it under law, and/or we have your consent where required.

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3. How we collect personal information

We collect personal information in a variety of ways, including:

- directly from you when you make enquiries, engage us, complete forms, provide instructions, apply for products or services, or communicate with us;
- from our website and online services (including via cookies and similar technologies);
- from **third parties** where appropriate, such as:
    - product issuers, insurers, superannuation trustees and platform providers;
    - banks and financial institutions;
    - your authorised representatives (e.g. accountant, lawyer);
    - referrers (with your knowledge/authorisation where required);
    - identity verification providers and document verification services;
    - our professional advisers, contractors and service providers;
    - publicly available sources and databases.

If you do not provide personal information we request, we may not be able to provide financial services or products to you, or we may be limited in the advice or services we can provide.

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4. Why we collect, hold, use and disclose personal information

We collect, hold, use and disclose personal information to:

- provide financial services, including financial product advice and dealing services (as applicable to our AFSL authorisations);
- assess your needs and objectives and provide appropriate services;

- implement your instructions, including applications, rollovers, switches, claims and ongoing servicing;
- communicate with you and respond to enquiries;
- administer our business operations, including billing, record-keeping and document management;
- meet our legal and regulatory obligations, including under:
    - the ***Corporations Act 2001*** **(Cth)** and ASIC regulatory requirements;
    - **anti-money laundering and counter-terrorism financing** laws (where applicable);
    - tax and superannuation regulatory requirements (where applicable);
    - dispute resolution and complaints handling obligations;
- manage risk, security and fraud prevention;
- conduct quality assurance, training and internal reviews;
- improve our services, including through analytics and service development;
- marketing and business development (see section 10).

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5. Disclosure of personal information - who we share it with

We may disclose personal information to third parties where necessary to deliver our services, or as otherwise permitted/required by law, including:

- product issuers, insurers, platform providers and superannuation trustees;
- banks, payment processors and financial institutions;
- your authorised representatives and professional advisers (e.g. accountant, solicitor);
- external service providers who support our operations, such as:
    - IT and cloud hosting providers;
    - CRM and practice management providers;
    - document management and e-signature providers;
    - identity verification and compliance providers;
    - analytics providers;

    - mailing, printing and communications providers;
- our auditors, consultants and professional advisers;
- regulators, courts, tribunals and law enforcement agencies, where required or authorised by law.

We take reasonable steps to ensure third parties who handle personal information on our behalf do so in a manner consistent with this Privacy Policy and applicable privacy laws (for example, through confidentiality and security obligations).

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6. Overseas disclosure

Some of our third-party service providers (including cloud and IT providers) may store, process or access personal information **outside Australia**.

Where we disclose personal information overseas, we take reasonable steps to ensure the overseas recipient does not breach the APPs, or we rely on an applicable exception under the Privacy Act.

Countries where overseas recipients we may use providers located in the United States, the United Kingdom, the European Union, Singapore and other jurisdictions only if accurate for the client's arrangements.

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7. Use of Artificial Intelligence (AI)

We may use **artificial intelligence (AI) tools and features** to support and improve our operations and service delivery. AI may be used for activities such as:

- drafting and summarising documents and communications;
- transcribing and summarising meetings or calls;
- searching, categorising and retrieving information from our records;
- quality assurance and consistency checks;
- detecting potential fraud, security risks or anomalies (where available in our systems);
- improving customer experience and operational efficiency.

7.1 Personal information used with AI

Depending on the task, AI tools may process personal information such as your name, contact details, communications, documents you provide, and information relevant to advice or service delivery.

7.2 AI service providers and data handling
Some AI functionality may be provided by third-party vendors (including cloud-based services). Where this occurs:

- we take reasonable steps to ensure confidentiality and security protections are in place; and
- AI providers may store or process information (including personal information) as part of delivering the service, which may include overseas storage or processing (see section 6).

7.3 Training of AI models
We do **not** intend to use your personal information to train public or generally available AI models, unless:

- you have provided informed consent; or
- it is otherwise permitted by law; or
- the information is de-identified and cannot reasonably identify you.

7.4 Your choices
Where practical and appropriate, you may request that we limit the use of AI tools for particular interactions or documents. If we cannot accommodate the request (for example, due to system requirements), we will explain why.

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8. Direct marketing

We may use your personal information to send you marketing communications about our services and related offerings where permitted by law.

You can opt out at any time by:

- using the unsubscribe function in electronic communications (where provided); or
- contacting us using the details in section 13.

We will comply with the ***Spam Act* 2003 (Cth)** and other applicable laws.

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9. Cookies, website analytics and online services

If we operate a website, we may use cookies and similar technologies to:

- operate the website and enhance functionality;
- understand how visitors use the website;

- measure the effectiveness of communications and campaigns; and
- improve our services.

You can manage cookies through your browser settings. Disabling cookies may affect website functionality.

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10. Security and retention of personal information

We take reasonable steps to protect personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure. Measures may include:

- access controls and multi-factor authentication (where applicable);
- encryption in transit and at rest (where applicable);
- secure storage and disposal procedures;
- staff training and confidentiality obligations;
- monitoring and incident response procedures.

We retain personal information for as long as needed for our functions and activities, including to meet legal and regulatory record-keeping requirements. When information is no longer required, we take reasonable steps to destroy or de-identify it, unless we are required by law to retain it.

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11. Access to and correction of personal information

You may request access to the personal information we hold about you and request correction if it is inaccurate, out of date, incomplete, irrelevant or misleading.

We will respond within a reasonable time. We may need to verify your identity before providing access or making corrections.

In some cases, we may refuse access as permitted by law (for example, where providing access would have an unreasonable impact on the privacy of others, or relates to legal professional privilege). If we refuse access, we will provide reasons (where permitted) and explain complaint options.

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12. Making a privacy complaint

If you believe we have breached the APPs or mishandled your personal information, you can complain to us using the details in section 13. Please include as much detail as possible.

We will:

- acknowledge your complaint within a reasonable time; and
- investigate and respond in writing within a reasonable time.

If you are not satisfied with our response, you may complain to the **Office of the Australian Information Commissioner (OAIC)**:

- Website: https://www.oaic.gov.au/
- Phone: 1300 363 992
- Address: GPO Box 5218, Sydney NSW 2001

If your complaint relates to our financial services, you may also be able to complain to the **Australian Financial Complaints Authority (AFCA)** (where applicable):

- Website: https://www.afca.org.au/
- Phone: 1800 931 678

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13. Contact us

If you have questions about this Privacy Policy, or want to access or correct your personal information, or make a complaint, contact:

Privacy Officer
Barchester Financial Services Pty Ltd
Address: 5 Latrobe Terrace Paddington QLD, 4064 Australia
Email: complaints@barchesterfs.com.au
Phone: 07 3510 3510

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14. Updates to this Privacy Policy

We may update this Privacy Policy from time to time. The latest version will be made available on our website or on request.

Last updated: 23 June 2026

Approved for distribution