



Templestone
Financial Services

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Financial Services Guide (FSG) and Adviser Profile

VERSION 4.0





‘Not Independent’

Templestone Financial Services Pty Ltd receives commission payment on Life Insurance Products. This allows us to advise and place your insurance without charging you, the client, directly but rather receiving remuneration from product issuers. By doing this we are not allowed to use the words Independent, Impartial or Unbiased when describing our business. For more information, please contact your adviser.



FINANCIAL SERVICES GUIDE

This Financial Services Guide (FSG) is issued by Templestone Financial Service Pty Ltd ABN 99 641 075 952 AFSL 523831 referred to as **"Templestone"**, **"we"**, **"us"**, and **"our"**. Templestone Financial Service Pty Ltd is a boutique, independently owned Financial Services company. Templestone is not related to any Bank or Institution and offers to Templestone client's access to scale, broad- based approved product access.

There are two parts to this FSG. Please make sure that you read both parts before making any decision based on our advice. This document is Part one and Part two is the Adviser's Profile, which includes information about your financial adviser ("adviser"), who is one of our Authorised Representatives. Any reference to an adviser will include the deals of the adviser's company if they are part of a corporate entity. If the adviser's profile is not attached, please ask the adviser for this profile or contact Templestone Head Office whose contact details are in the next section. Your adviser is authorised by us to distribute this FSG.

What is a Financial Services Guide (FSG)

The Financial Services Guide (FSG) is an important document that is designed to help you decide whether to use the financial services offered.

The main purpose of the Financial Services Guide (FSG) is to give you an overview of the financial services that are being offered and it provides you with the following information:

- About us;
- What kinds of financial services we are authorised to provide to you;
- The process we follow to provide financial services;
- How we, our Authorised Representatives (and any other relevant persons) are remunerated;
- Are there any of our associations or relationships that might influence the financial services we offer?
- How we collect, use and disclose the information you provide to us
- Our complaints handling procedures and external dispute resolution procedures including how you can access them.

The terms Representative, Authorised Representative, Corporate Authorised Representative, and Advice Provider means that a person, or entity, is authorised to represent a business that holds an Australian Financial Services (AFS) license. Templestone is the holder of an AFS License and is therefore responsible for the financial services provided, including the distribution of this Financial Services Guide (FSG).

As there are many different titles in the marketplace describing such authorised representatives and advice providers throughout this document, we are describing them as Adviser(s) or Your Adviser(s).



What Kinds of Financial Services we are authorised to provide to you and what kinds of financial products do these services relate to?

Templestone is authorised to provide product advice on and to deal in the following strategies and classes of products:

Strategies Financial planning strategies including:	Product Classes
<ul style="list-style-type: none"> • Tax planning (in consultation with your tax adviser) 	<ul style="list-style-type: none"> • Deposit and payment products limited to; <ul style="list-style-type: none"> · Basic deposit products and deposit products other than basic deposit products. · Debentures, stocks or bonds issued or proposed to be issued by a government.
<ul style="list-style-type: none"> • Estate planning 	<ul style="list-style-type: none"> • Life Products including Investment Life
<ul style="list-style-type: none"> • Business succession planning including life risk insurance 	<ul style="list-style-type: none"> • Insurance Products, and Life Risk Insurance Products.
<ul style="list-style-type: none"> • Life Insurance and risk management 	<ul style="list-style-type: none"> • Interests in managed investment schemes including Investor directed portfolio services (IDPS).
<ul style="list-style-type: none"> • Pre and post retirement planning 	<ul style="list-style-type: none"> • Retirement savings accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997).
<ul style="list-style-type: none"> • Retirement income 	<ul style="list-style-type: none"> • Securities.
<ul style="list-style-type: none"> • Social security advice 	<ul style="list-style-type: none"> • Superannuation.
<ul style="list-style-type: none"> • Investments 	<ul style="list-style-type: none"> • Margin Lending
<ul style="list-style-type: none"> • Self-managed superannuation funds (SMSF) 	
<ul style="list-style-type: none"> • Wealth accumulation 	
<ul style="list-style-type: none"> • Wealth creation 	
<ul style="list-style-type: none"> • Superannuation and rollover advice 	
<ul style="list-style-type: none"> • Asset allocation and management advice 	
<ul style="list-style-type: none"> • Ongoing advice and review services 	

Your Adviser may only be authorised to provide advice in some of the above areas. Please refer to the Adviser Profile (Part 2 of this FSG) which sets out those areas your Adviser is authorised to provide you with advice and recommendations.

Please note that only products approved by Templestone may be recommended by the adviser. If you hold a specific product which is under a class of product covered by the Templestone licensee, your adviser may review and advise you on this product even though it is not on our Approved Product List (APL). However, your Adviser will not be able to deal in, write or arrange further business on the product if it is not on our:

- APL
- is a product on which they are not authorised to provide personal advice. The Adviser Profile (Part two of this FSG) outlines the classes of financial products on which they can provide advice.

Your adviser may also conduct separate business activities such as accounting, mortgage advice and other services not provided under our licence. We are only responsible for the financial products and services described in this FSG and on our APL. From 1 July 2014, new regulation requires your financial adviser to declare whether they are a registered (tax) adviser and the tax (financial) advice service they are authorised to provide.



The process we follow to provide financial services.

Your adviser acts as our Authorised Representative when providing personal advice to you and therefore we are responsible for any advice given. Your adviser is under an obligation to act in your best interests in relation to any personal advice provided to you (known as the 'best interest duty').

Your adviser is authorised by us to give you personal advice, but in order for them to do so, you need to provide them with information about your needs, goals and objectives. If you choose not to provide your adviser with this information, any advice they provide may not be appropriate to your needs.

Providing your adviser with instructions on how to buy or sell financial products.

You may specify how you would like to give your adviser instructions, for example, in writing, by telephone, fax or other means. However, in some instances your adviser will require your instructions to be in writing. For your own protection, you should not:

- sign any blank forms or documents
- appoint any financial adviser to act as your attorney or authorised signatory
- nominate any financial adviser to receive your statements without you also receiving a copy or give your adviser unclear or misleading instructions or false information.

Other documents that you may receive in addition to the FSG and Adviser Profile, your financial adviser may provide you with the following documents:

■ **A Statement of Advice (SoA) or Record of Advice (RoA)**

Before your adviser provides you with any personal financial product advice (personal advice), they will collect information about you, your objectives, financial situation and needs. The SoA will set out the advice and the basis upon which it is given. You may then decide whether or not to act on it. It will also set out information about our remuneration and your adviser's remuneration and disclose any associations or relationships which might reasonably be expected to influence them when providing the advice. Any subsequent personal advice that is provided to you may, if it is in relation that has already been provided to you, be documented in an ROA, provided there has not been a significant change in your personal circumstances or the basis upon which the initial advice was provided. Copies of all advice documents will be retained on your client file and you may request a copy by contacting your adviser.

■ **A Product Disclosure Statement (PDS)**

If a particular financial product (other than securities) is recommended by your adviser, you must also be provided with a PDS issued by the product issuer. The PDS contain information about the benefits, risks and other features of the product, which will enable you to make an informed decision about whether to purchase the product.



How we, our advisers (and other relevant persons) are remunerated.

Both we, and your adviser receive remuneration from:

- service and advice fees paid by you;
- Remuneration and other payments paid by product providers;

All Fees and Remunerations must be paid to us, the Financial Services Licensee. We will then forward on to your adviser their share of the fee or remuneration.

No Fee or Remuneration is allowed to be paid to your Adviser directly or by way of direct debt to your adviser's account.

Service and advice fees paid by you

Your adviser will discuss and explain our fee structure with you before we provide you with any financial advisory services. The types of fees you can be charged are listed below. Also, you may be charged a combination, or part of, any of these fees:

- Fee for advice - your adviser may charge fees for the preparation and implementation of the advice. These fees will be based on your individual circumstances, the complexity of your situation and the time it takes to prepare personal financial advice for you.
- Ongoing advice fee - your adviser may charge either a fixed fee agreement or ongoing fee to provide ongoing portfolio reviews and/ or for the provision of ongoing services. This fee will be either a set amount or based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio, e.g., an hourly rate. Your adviser will discuss these fees with you prior to giving you the advice.

General Advice / Execution Only instructions

Where "General Advice" or an "Execution Only" instruction is provided, you may request particulars of remuneration payable to us and to your adviser, directly from your adviser. Please refer to the Adviser Profile attached for information about any portion of these fees that we may retain and please ask your adviser, or us, if you require further information about any of the fees and charges that you pay.

Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods. Where it is debited from your investments, it is normally referred to as the Adviser Service Fee. In most instances, you will be able to select the method of payment that suits you best. Your Adviser will discuss and agree the method of payment with you before providing you with services. The specific fees and services that you will pay for will be set out in your SoA or other advice documents, your annual fee disclosure statement or client service agreement. Your current options:

You may choose to be charged a financial planning advice fee that is based on the time spent preparing your SoA (or other advice document) and is dependent on the complexity of the advice; or You may enter into a service agreement with your adviser that covers items such as ongoing advice, newsletters, annual reviews and portfolio valuation reports. You and your adviser should discuss the services to be included and the fee that you will pay.

Alternatively, it will be set out in the service agreement provided by your adviser either



Part one

before, or at the time, you are presented with your SoA.

Remunerations and other payments paid by product providers

If you implement a financial product through us, we may receive payments in the form of initial remuneration and/or ongoing remuneration from the financial product providers. These remunerations are included in the fees and premiums you pay for the product. This is not an additional cost to you.

Risk insurance products

We may receive initial remuneration from the life insurance company for risk insurance products that you purchase, and we may also receive ongoing remuneration when you renew your policy. This remuneration is taken out of the premium that you pay and is not a separate charge to you. Applicable risk insurance remunerations are included in the Adviser Profile and will be detailed in your SOA. No remuneration is payable on group insurance policies held within your superannuation that commenced after 1 July 2013. Remunerations may also be received in relation to retail insurance policies held within superannuation irrespective of the date of commencement.

Referral arrangements

Your adviser may have referral arrangements or associations with other financial services providers, such as accountants. These are detailed in the Adviser Profile and may be referred to in any advice document provided to you.

How we collect, use and disclose information

Your adviser will retain the following personal information on your client file:

- A record of what you tell your adviser about your objectives, financial situation and needs to enable your adviser to give you personal advice.
- A copy of all personal advice provided to you. This includes the Statement of Advice or Record of Advice (SoA or RoA) provided to you when you initially received personal advice, as well as any subsequent advice. And
- Other records relating to the provision of financial services and advice given to you. Ask your adviser if you would like to examine your client file. You can request a copy of any advice document either by phone or in writing. Please allow at least seven working days to process your request.
- A record of what you tell your adviser about your objectives, financial situation and needs to enable your adviser to give you personal advice.
- A copy of all personal advice provided to you. This includes the Statement of Advice or Record of Advice (SoA or RoA) provided to you when you initially received personal advice, as well as any subsequent advice. And
- Other records relating to the provision of financial services and advice given to you. Ask your adviser if you would like to examine your client file. You can request a copy of any advice document either by phone or in writing. Please allow at least seven working days to process your request.

If your adviser leaves our licence and starts providing financial services under another licensee, your information may be transferred to the new licensee. You will be advised of any such transfer prior to it taking place and you will be given the opportunity to remain with one of our Templestone advisers if you prefer to do so.

Your privacy

We are committed to maintaining the privacy and security of your personal information. Your personal information will be collected for the primary purpose of providing you with the services described in this FSG. If you do not provide the personal information requested, we



may be unable to provide you with the financial services you have requested.

Anti-Money Laundering and Counter Terrorism

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act 2006 (Cth) to verify your identity and the source of any funds. This means that we will ask you to present identification documents to meet the ID requirements which are determined by the relevant regulator AUSTRAC. We will also retain copies of this information. In connection with providing our services to you, we may disclose information about you to your Authorised Representatives and to other professionals, such as insurance providers, superannuation trustees, product issuers, auditors and our service providers.

We may disclose your personal information to overseas recipients for the preparation of advice. However, any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient of your personal information complies with the Australian privacy law.

Your Privacy

Your personal information will be handled in accordance with our Privacy Policy which outlines how we collect, use, store and disclose your personal information. For more information, including how to access or correct your personal information, or how to complain about a breach of the Australian Privacy Principles, please read our Privacy Policy which can be accessed on our website (www.templestonefs.com.au) or by contacting us on 02 8607 1417 or by writing to:

Privacy Officer

Templestone Financial Services Pty Ltd

Suite 8, Level 1, 4A Meridian Place Bella Vista NSW 2153

or by asking your adviser for a copy.

Our complaints handling process

If you have a complaint about the financial services provided to you, you should take the following action:

- Speak to your financial adviser about your concerns, or
- Call the compliance manager on 0402 252 772

If after speaking to us or your financial adviser, and your complaint is not resolved within five business days, please write to:

Compliance and Professional Standards Manager

Templestone Financial Services Pty Ltd

Suite 8, Level 1, 4A Meridian Place Bella Vista NSW 2153

or Email compliance@templestone.com.au

We will try and resolve your complaint quickly and fairly. If your complaint cannot be resolved by us to your satisfaction or within 30 days, you may refer your complaint, free of charge, to the Australian Financial Complaints Authority (AFCA) of which Templestone Financial Services Pty Ltd is a member.

AFCA can be contacted on:

1800 931 678 or via mail:

Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001.

Part one



Email: info@afca.org.au Website: www.afca.org.au

Alternatively, other matters can be referred to the industry regulator, the Australian Securities and Investments Commission (ASIC) on **1300 300 630** or via the website **www.asic.gov.au**.

Professional Indemnity (PI) Insurance Cover

Our professional indemnity insurance covers us and our authorised representatives for the services provided under our Australian Financial Service Licence. This includes claims relating to the conduct of staff and representatives who no longer work for us but did so at the time of relevant conduct. Our policy meets the requirements of the Corporations Act 2001 (Cth).



ADVISER PROFILE

Introduction

This Adviser Profile is Part 2 of our Financial Services Guide (FSG) and provides you with further information about your Authorised Representative of Templestone. The Adviser Profile must be read in conjunction with Part 1 of the FSG and if Part 1 is not attached please ask the adviser for this profile or contact Templestone's Head Office on (02) 8607 1417.

Who is my adviser?

Your adviser is Chandar Varadhan (ASIC Authorised Representative No. 001239623) of Meru Solutions Pty Ltd Trading As Dimar Financial Services whose Australian Securities and Investments Commission (ASIC) number is 1286488. Meru Solutions Pty Ltd is a Corporate Authorised Representative of Templestone Financial Services Pty Ltd.

Chandar's contact details are:

Office Address: Suite 302, Level 3, 33 Lexington Drive, Bella Vista NSW 2153

Postal Address: Suite 302, Level 3, 33 Lexington Drive, Bella Vista NSW 2153

Telephone: 02 8607 1417

Mobile: 0402 252 772

Email: advice@dimarfs.com

Company Website: www.dimarfs.com

Experience:

Over 20 years of experience in financial services industry specialising in regulatory compliance, having worked in all sizes of businesses ranging from small to medium to big conglomerates such as AMP and CBA. Holds a Master of Business Management degree and a Certified Financial Planner® with accreditations in Self-Managed Super Fund (SMSF), Aged Care, Direct Shares and Margin lending. Chandar is very passionate about financial advice and believe a sound strategy coupled with a disciplined approach to investing is the main ingredient for financial success. He firmly believes that you must be an investor first to be wealthy and not the other way around.

Chandar is also a Director of Templestone Financial Services Pty Ltd

Qualifications:	Memberships:
Certified Financial Planner CFP®	Financial Advice Association of Australia (FAAA)
Certificate IV Finance and Mortgage Broking	
Accredited Aged Care Professional	
Master of Business (Management)	



What kinds of Financial services are you authorised to provide me and what kinds of Financial product/s do those services relate to?

Chandar is authorised by Templestone Financial Services Pty Ltd to provide product advice on and to deal in the following strategies and classes of products:

Strategies Financial planning strategies including:	Product Classes
<ul style="list-style-type: none"> • Tax planning (in consultation with your tax adviser) 	<ul style="list-style-type: none"> • Deposit and payment products limited to; <ul style="list-style-type: none"> · Basic deposit products and deposit · products other than basic deposit products. · Debentures, stocks or bonds issued or proposed to be issued by a government.
<ul style="list-style-type: none"> • Estate planning 	<ul style="list-style-type: none"> • Life Products including: Investment Life
<ul style="list-style-type: none"> • Business succession planning including life risk insurance 	<ul style="list-style-type: none"> • Insurance Products, and Life Risk Insurance Products.
<ul style="list-style-type: none"> • Life Insurance and risk management 	<ul style="list-style-type: none"> • Interests in managed investment schemes including Investor directed portfolio services (IDPS).
<ul style="list-style-type: none"> • Pre and post retirement planning 	<ul style="list-style-type: none"> • Retirement savings accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997).
<ul style="list-style-type: none"> • Retirement income 	<ul style="list-style-type: none"> • Securities.
<ul style="list-style-type: none"> • Social security advice 	<ul style="list-style-type: none"> • Superannuation.
<ul style="list-style-type: none"> • Investments 	<ul style="list-style-type: none"> • Margin Lending
<ul style="list-style-type: none"> • Self-managed superannuation funds (SMSF) 	
<ul style="list-style-type: none"> • Wealth accumulation 	
<ul style="list-style-type: none"> • Wealth creation 	
<ul style="list-style-type: none"> • Superannuation and rollover advice 	
<ul style="list-style-type: none"> • Asset allocation and management advice 	
<ul style="list-style-type: none"> • Ongoing advice and review services 	

Only products approved by Templestone Financial Services Pty Ltd may be recommended by the adviser.

How are any remunerations, fees or other benefits calculated for providing the financial services?

The cost of providing a financial product or service to you will depend on the nature and complexity of the advice, financial product and/or service provided. The payment options for the provision of financial services will be discussed with you by your adviser and are as follows:

- Fee for service
- Implementation fees
- Transaction fees
- Brokerage/Remuneration
- Ongoing service fees
- Or a combination of the above depending on what best suits the client.

Please note that the type of payment option can also depend on the type of product and/or advice implemented, and your adviser will discuss this with you. All fees, remuneration and brokerage payments received for the financial services provided are paid to Templestone Financial Services Pty Ltd. Templestone Financial Services Pty Ltd pays 100% of the fee/commission to Meru Solutions Pty Ltd. Meru Solutions Pty Ltd then pays Chandar a combination of salary and other benefits for the provision of financial services.



Templestone
Financial Services

Contact Us

+61 02 8607 1417
contact@templestone.com.au
www.templestone.com.au

Our Office

Suite 8, Level 1
4A Meridian Place Bella Vista
NSW 2153

PART 1 – PRIVACY POLICY

Introduction

For the purpose of this Privacy Policy, Templestone Financial Services Pty Ltd ('Templestone') consists merely of its officers, agents, employees, contractors, and representatives who will be bound under these arrangements.

This policy is reviewed regularly by Templeton. In addition, if there is a major compliance breach in this area, Templeton shall review the relevant procedure or engage an external compliance consultant to review the procedure.

Templeton acknowledges the importance of having an effective and efficient Privacy Policy in accordance with the Australian Privacy Principles (APP's). The Privacy Amendment act introduced significant changes to the Privacy Act 1988 (Cth) (Privacy Act). This Policy provides guidance on how Templeton its entities, officers, advisers, agents, and employees who collect, use and retain personal and sensitive information will comply with the APP's.

Overview

Templeton intends that this policy will apply to all entities of the group and the Privacy Amendment Act states that the APPs apply to individuals, body corporates, partnerships, unincorporated associations or trusts unless they are a small business operator. A small business operator is defined as a business with an annual turnover of \$3,000,000 or less for a financial year unless an exemption applies. Notwithstanding that some advisers may operate a business that would come under the small business exemption, as advisers or agents of Templeton they will still be obliged to comply with the APPs.

Definition

Personal information means 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.

Australian Privacy Principles (APP)

APP1 – Open and transparent management of personal information

APP 1 requires organisations to have ongoing practices and policies in place to ensure that they manage personal information in an open and transparent way.

APP 1 introduces more prescriptive requirements for privacy policies than the existing requirements in APP

An organisation must have an APP privacy policy that contains specified information, including the kinds of personal information it collects, how an individual may complain about a breach of the APPs,

and whether the organisation is likely to disclose information to overseas recipients. An organisation needs to take reasonable steps to make its APP privacy policy available free of charge and in an appropriate form.

APP 1 also introduces a positive obligation for organisations to implement practices, procedures and systems that will ensure compliance with the APPs and any registered APP codes.

In accordance with the above requirements, it is the policy of Templeton that, all persons to whom this policy applies are required to inform themselves of their obligations under the APPs.

Templeton will provide training as and when required to ensure persons to whom this policy applies are aware of their obligations under the APPs. All clients of Templeton are entitled to access their private information upon request. Any complaints regarding the handling of private information shall be referred to the Templeton.

How Templeton manages private information will be set out in this policy. This policy shall be made available on websites operated by Templeton and its related companies, agents, and representatives.

On request, clients are to have free access to this policy in any form requested, so long as it is practical to do so.

Members of the Templeton group may collect and hold personal information such as a person's name, address, date of birth, income, tax file number (TFN) and such other information that may be required from time to time to provide services to clients. This is collected directly from its clients and personal information is held by either company within the Templeton group or its advisers and agents. Any personal information collected by Templeton is solely for the purpose of providing services to clients and meeting licensing obligations and is not to be used for any other purpose without consent. Clients may seek access to their personal information by contacting the appropriate entity of the Templeton Group. If a correction is required to that personal information the client may make that amendment by notifying the appropriate entity within the Templeton Group.

If a client is not satisfied with the outcome of their complaint, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). Further information is available on the OAIC's website at www.oaic.gov.au.

Templeton will only disclose personal information of its clients to overseas recipients where such disclosure is required to give effect to the instructions of a client. It is not practical to list all countries to which this applies due to the variety of international financial services available to clients.

APP2 – Anonymity and Pseudonymity

APP 2 sets out a new requirement that an organisation provide individuals with the option of dealing with it using a pseudonym. This obligation is in addition to the existing requirement that organisations provide individuals with the option of dealing with them anonymously.

Both requirements are subject to certain limited exceptions, including where it is impracticable for the organisation to deal with an individual who has not identified themselves, or where the law or a court/tribunal order requires or authorises the organisation to deal with individuals who have identified themselves.

As Templeton and its entities deal primarily with clients in financial services, it is unlikely that it would be practical for services to be provided to those clients without them having identified themselves. Further, in most situations companies within the Templeton group will be required under the terms of the Anti-Money Laundering and Counter-terrorism Financing Act 2006 (Cth) (AML/CTF Act) to appropriately identify clients.

APP3 – Collection of solicited personal information

APP 3 outlines when and how an organisation may collect personal and sensitive information that it solicits from an individual or another entity.

An organisation must not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of the organisation's functions or activities. APP 3 clarifies that, unless an exception applies, sensitive information must only be collected with an individual's consent if the collection is also reasonably necessary for one or more of the organisation's functions or activities.

An organisation must only collect personal information from the individual unless it is unreasonable or impracticable to do so.

Templeton is required to collect only information that is reasonably necessary for one or more of its functions. To meet legislative requirements, it is envisaged that Templeton will be required to collect the information needed to comply and store that information including Tax File Number (TFN) and personal medical information.

Where personal information is required to be obtained from clients for them to be provided services from entities within Templeton, those entities must consent to the collection of their personal information.

Templeton entities may be provided with personal information collected from clients of non-related entities for the purpose of providing the services offered by Templeton entities. The information collected from 3rd parties is collected and used only for the purpose of the specific service and is not disclosed or used for any other purpose.

APP4 – Dealing with unsolicited personal information

APP 4 creates new obligations in relation to the receipt of personal information which is not solicited. Where an organisation receives unsolicited personal information, it must determine whether it would have been permitted to collect the information under APP 3. If so, APPs 5 to 13 will apply to that information.

If the information could not have been collected under APP 3, and the information is not contained in a Commonwealth record, the organisation must destroy or de-identify that information as soon as practicable, but only if it is lawful and reasonable to do so.

Templeton entities in receipt of information detailed above should review whether that information could have been necessary or obtained under APP3 and if not then take action to destroy or de-identify that information if it is lawful and reasonable to do so. (For example documents of a personal nature (photos letters emails) accidentally included in other information provided).

APP5 – Notification of the collection of personal information

APP 5 specifies certain matters about which an organisation must generally make an individual aware, at the time, or as soon as practicable after, the organisation collects their personal information.

In addition to the matters listed in APP 1.3, APP 5 requires organisations to notify individuals about the access, correction, and complaints processes in their APP privacy policies, and the location of any likely overseas recipients of individuals' information.

If entities of Templeton utilise 3rd parties to collect information, then they are obliged under this policy to provide the above information.

APP6 – Use and disclosure of personal information

APP 6 outlines the circumstances in which an organisation may use or disclose the personal information that it holds about an individual.

APP 6 generally reflects the APP 2 use and disclosure obligations. In addition, APP 6 introduces a limited number of new exceptions to the general requirement that an organisation only uses or discloses personal information for the purpose for which the information was collected.

These exceptions include where the use or disclosure is reasonably necessary:

- to assist in locating a missing person
- to establish, exercise or defend a legal or equitable claim, or
- for the purposes of a confidential alternative dispute resolution.

Entities of Templeton if approached for the disclosure of personal information outside its normal business practices (including those above) then approval should be sought from the Privacy Officer.

APP7 – Direct marketing

The use and disclosure of personal information for direct marketing is now addressed in a discrete privacy principle (rather than as an exception in APP 2).

Generally, organisations may only use or disclose personal information for direct marketing purposes where the individual has either consented to their personal information being used for direct marketing or has a reasonable expectation that their personal information will be used for this purpose, and conditions relating to opt-out mechanisms are met.

APP 7.5 permits contracted service providers for Commonwealth contracts to use or disclose personal information for the purpose of direct marketing if certain conditions are met.

Entities of Templeton must have direct marketing approved by the licensee and for the purposes of this policy any marketing material that is explicitly provided for clients, e.g., monthly magazines should provide those clients with an ability to opt-out.

Clients of Templeton can elect to opt-out of receiving direct marketing materials by contacting their adviser or the Privacy Officer at Templeton.

APP8 – Cross-Border disclosure of personal information

APP 8 and a new s 16C introduce an accountability approach to organisation's cross-border disclosures of personal information.

Before an organisation discloses personal information to an overseas recipient, the organisation must take reasonable steps to ensure that the overseas recipient does not breach the APPs (other than APP 1) in relation to that information. In some circumstances an act done, or a practice engaged in, by the overseas recipient that would breach the APPs, is taken to be a breach of the APPs by the organisation. There are several exceptions to these requirements.

Other than in the circumstances outlined in APP1 or financial products and services approved by Templeton, entities of Templeton shall seek approval from the Privacy Officer prior to establishing arrangements that would see personal information transferred out of Australia without the clients' prior approval. (e.g., utilising an overseas based accounting organisation to provide work).

APP9 – Adoption, use or disclosure of government related identifiers

APP 9 prohibits an organisation from adopting, using, or disclosing a government related identifier unless an exception applies. APP 9 generally retains the same exceptions as APP 7, with some additions and amendments.

Templeton entities shall not use for example a tax file number as a client reference for filing purposes.

APP10 – Quality of Personal Information

Under APP 10, an organisation must take reasonable steps to ensure the personal information it collects is accurate, up-to-date, and complete (as required by APP 3).

In relation to use and disclosure, the quality requirements differ from APP 3. For uses and disclosures, the personal information must be relevant, as well as, accurate, up-to-date, and complete, having regard to the purpose of the use or disclosure.

Templeton entities are required to update information held on a regular basis and should not rely on outdated information.

APP11 – Security of personal information

APP 11 requires an organisation to take reasonable steps to protect the personal information it holds from interference, in addition to misuse and loss, and unauthorised access, modification and disclosure (as required by APP 4.1).

All Templeton entities must take reasonable steps to ensure that data is securely stored including password protection on computer files and confidential destruction of paper records.

APP 11 requires Templeton entities to take reasonable steps to destroy or de-identify personal information if the organisation no longer needs it for any authorised purpose.

Under APP 11 there are two exceptions to this requirement:

- the personal information is contained in a Commonwealth record, or
- the organisation is required by or under an Australian law or a court/tribunal order to retain the information.

APP12 – Access to personal information

The APPs separate the access and correction requirements into two separate principles. Like APP 6, APP 12 requires an organisation to give an individual access to the personal information that it holds about that individual, unless an exception applies. The exceptions are substantially like the exceptions in APP 6.

There is a new requirement for organisations to respond to requests for access within a reasonable period. In addition, organisations must give access in the manner requested by the individual if it is reasonable to do so. If an organisation decides not to give an individual access, it must generally provide written reasons for the refusal and the mechanisms available to complain about the refusal.

If an organisation charges an individual for giving access to the individual's personal information, the charge must not be excessive, and must not apply to the making of the request.

APP13 - Correction of personal information

APP 13 introduces some new obligations in relation to for correcting personal information, which differ from those in APP 6. The APPs remove the APP 6 requirement for an individual to establish that their personal information is inaccurate, incomplete or is not up-to-date and should be corrected.

APP 13 now requires an organisation to take reasonable steps to correct personal information to ensure that, having regard to a purpose for which it is held, it is accurate, up-to-date, complete, relevant, and not misleading, if either:

- the organisation is satisfied that it needs to be corrected, or
- an individual requests that their personal information be corrected.

Organisations generally need to notify other APP entities that have been provided with the personal information of any correction if that notification is requested by the individual.

APP 13 contains similar provisions to APP 6 in relation to associating a statement with the personal information if the organisation refuses to correct the information and the individual requests a statement to be associated.

An organisation must also respond to a correction request or a request to associate a statement by the individual within a reasonable period after the request is made and must not charge the individual for making the request, for correcting the personal information, or for associating the statement with the personal information.

When refusing an individual's correction request, an organisation must generally provide the individual with written reasons for the refusal and notify them of available complaint mechanisms.

Privacy Complaints

If a client believes that a breach of the APPs has occurred, they can direct their complaint to the

Privacy Officer.

The relevant contact details are:

Privacy Officer
Suite 415, 33 Lexington Drive
Bella Vista NSW 2153

Tel: 0402252772

Email templetonadvice@gmail.com

If a client is not satisfied with the outcome of their complaint, they may lodge a complaint with the Office of the Australian Information Commissioner (OAIC). Further information is available on the OAIC's website at www.oaic.gov.au.

Non – compliance with this policy

Non-compliance with this Policy may result in disciplinary action including the termination of a relationship with Templeton if the breach is considered serious.

If you are uncertain about this policy, then contact the Privacy Officer on 0402 252 772.

PART 2 – COMPLAINTS POLICY

Introduction

For the purpose of this Privacy Policy, Templestone Financial Services Pty Ltd ('Templestone') consists merely of its officers, agents, employees, contractors, and representatives who will be bound under these arrangements.

This policy is reviewed regularly by Templeton.

Overview

Australian Financial Services Licensees (AFSL) are required to have a publicly available and a readily accessible policy document on how it intends to comply with the requirements outlined in the Regulatory Guide (RG) 271. You may also contact us if you would like to know about our Internal Dispute Resolution (IDR) policy.

How can you lodge a complaint?

You may contact us via online, email, phone or may do so in person. If you need additional assistance, you may contact us directly or your adviser who might be able to assist.

What happens next?

- We will acknowledge your complaint within 24 hours in writing
- We will contact you if we need any clarification
- We will review your complaint which may require requesting additional information from your adviser.
- If we can resolve your complaint within 5 days of receipt, we will advise you, but may not provide a written response unless you request in writing.
- In any case, we will respond to your complaint within 30 days of receipt in writing.
- If we are unable to respond within 30 days due to certain circumstances beyond our control, we will contact you to advise you of the delay.
- If you are not satisfied with our response, you may refer the matter to:
 - Australian Financial Complaints Authority (AFCA)
 - GPO Box 3, Melbourne VIC 3001
 - Ph: 1800 931 678