

# **Financial Services Guide**

## **LFC Group Pty Ltd**

**investblue**  
it's possible.

## Financial Services Guide (FSG)

This Financial Services Guide was prepared on 15 December 2025.

### What is a Financial Services Guide?

This Financial Services Guide ('**FSG**') helps you understand and decide if you wish to use the financial services, we are able to offer you.

It provides you with information about the entities that may provide you with financial services:

- LFC Group Pty Ltd (**LFC Group**)
- LFC Advice Pty Ltd trading as Invest Blue (**Invest Blue**)

We collectively refer to Authorised Representative(s) in this FSG as "us, our, we". We are the providing entity and are the authorised representative(s) of LFC Group.

This FSG sets out the services we provide. It tells you:

- who we are and how we can be contacted;
- who the licensee is and how it can be contacted;
- what services and products we are authorised to provide to you;
- how we (and any other relevant parties) are paid; and
- how we deal with complaints.

### The advice process

#### Lack of independence

LFC Group Pty Ltd and LFC Advice Pty Ltd (together, **LFC**) is ultimately wholly owned by Invest Blue Finance Pty Ltd ACN 661 784 541 (**Invest Blue Finance**), which is a wholly owned subsidiary of Invest Blue Pty Ltd ACN 001 874 744 (**Invest Blue Parent**). These parent entities have extensive related body corporates, associations and relationships with other financial planning, credit, legal, insurance, aged care and accounting businesses.

Invest Blue Parent is a wholly owned subsidiary of Ironbark Investment Partners Pty Ltd ACN 136 679 215 (**Ironbark**), which has interests in diversified financial services businesses.

LFC, through Invest Blue Parent, Ironbark, its own associations, relationships and/or its related body associations and relationships, may receive benefits by referring you to our related companies, related party products and/or ancillary specialist services. If this is applicable to you, we will only do this where this is in your best interest and we will disclose the entity, product or service where we receive any additional benefit, or it is seen as a potential or perceived conflict in your advice documents such as your SOA or ROA.

Authorised representatives and/or staff employed in our business may also hold shares in Ironbark, whose revenue and profit and therefore dividends to shareholders, may be favourably affected by provision of products or services that we and other Ironbark companies provide to you (which may include diversified financial services).

We may provide you with personal advice that takes into account your needs, financial situation and circumstances. Where we provide you with personal advice, we will provide you with a Statement of Advice (**SOA**). The SOA outlines our advice and the basis on which the advice was given. It also outlines relevant information about us, our fees and charges associated with our advice. We are only able to provide personal advice about certain products as stipulated under the LFC Group's Australian Financial Services Licence (**AFSL**).

If we provide further personal advice after providing our initial advice, we may record this in a Record of Advice (**ROA**), instead of an SOA. You may request a record of the further advice that is provided

to you, if you haven't already been provided with it. You can also contact us, using the in this FSG, within 7 years from when the advice is provided to request this record.

Occasionally we provide general advice. This is where we may express an opinion or recommendation influencing you in making a decision in relation to a financial product, but where we have not considered your personal objectives, financial situation or needs. If we provide you with general advice, we will provide you with a warning that the advice may not be appropriate to your needs, financial situation or objectives.

If a financial product is recommended to you, you will be provided with a Product Disclosure Statement (**PDS**) (if one is available) and a Target Market Determination (**TMD**) (if one is available) provided by the product issuer. The PDS contains information about the product to assist you in making an informed decision about the financial product. It will outline relevant terms, benefits involved in acquiring the financial product, significant risks involved in acquiring the financial product, and fees and charges associated with the product. You should read the PDS and TMD before making a decision that a product is right for you.

LFC Group has arrangements in place to maintain professional indemnity insurance. This insurance satisfies the requirements under section 912B of the *Corporations Act 2001* (Cth) (**Corporations Act**).

Please retain this FSG for your reference and any future dealings with us. We may also add documents at a later date which will also form part of this FSG, and these should be read together with the FSG. These documents will include the word 'FSG' in the heading.

## **Who will be providing the financial services to you?**

### **The Licensee**

LFC Group is the authorising licensee for the financial services provided to you and is responsible for those services.

LFC Group authorises, and is also responsible for, the content and distribution of this FSG.

LFC Group's contact details are as follows:

**Licensee name:** LFC Group Pty Ltd  
**AFSL number:** 526600  
**Address:** Shop 3DD Lighthouse Lane, 145 – 149 King St, WARRAWONG, NSW, 2502  
**Website:** [www.investblueillawarra.com.au](http://www.investblueillawarra.com.au)  
**Phone:** (02) 4276 2557  
**Email:** [illawarra@investblue.com.au](mailto:illawarra@investblue.com.au)

We are the providing entity and are providing the financial services to you. LFC Group's Authorised Representatives who may provide services to you are listed below.

### **Authorised Representative details**

**Name:** LFC Advice Pty Ltd trading as Invest Blue  
**ASIC number:** 01285380  
**Address:** Shop 3DD Lighthouse Lane, 145 – 149 King St, WARRAWONG, NSW, 2502  
**Website:** [www.investblueillawarra.com.au](http://www.investblueillawarra.com.au)  
**Phone:** (02) 4276 2557  
**Email:** [illawarra@investblue.com.au](mailto:illawarra@investblue.com.au)

## **Who is Invest Blue?**

Invest Blue is one of Australia's largest financial advice and education firms, with a 60-year history of looking after the financial welfare of clients.

### **Our Authorised Representatives**

<b>Authorised Representatives</b>	<b>ASIC Register Number</b>	<b>Qualification</b>
Glen Belcher	001268919	BCom (Finance), Certified Financial Planner ®
Nicholas Pleski	001007876	BCom (Financial Planning), DFP
Jack Vaughan	001309733	BCom (Financial Planning), LLB

The authorised representatives named above share the same office as the LFC Group.

You can provide instructions to us by contacting us using the contact details above.

LFC Group and the Authorised Representatives listed in this FSG act on your behalf when we provide financial services to you.

### **Financial Advice Association Australia**

Invest Blue is a professional partner of the Financial Advice Association Australia (**FAAA**), the professional body representing qualified financial planners in Australia, and therefore adheres to set standards in terms of ethics, conduct and continuing professional development.

### **What services and products are we authorised to provide to you?**

We are authorised to provide financial product advice in relation to the following financial services:

- Wealth accumulation
- Income & asset protection
- Tax strategies
- Superannuation
- Retirement & redundancy planning
- Estate planning
- Government benefits
- Debt management

Glen Belcher and Nicholas Pleski are authorised to provide financial 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
- Superannuation
- Retirement savings accounts
- Managed investment schemes, including investor directed portfolio services (IDPS)
- Government debentures, stocks or bonds
- Securities
- Standard margin lending facilities

Jack Vaughan is authorised to provide financial 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
- Superannuation
- Retirement savings accounts
- Managed investment schemes, including investor directed portfolio services (IDPS)
- Government debentures, stocks or bonds
- Securities

There is an important difference between 'general advice' and 'personal advice'. If we provide you with 'general advice' it means that we have not considered any of your individual objectives, financial situation and needs.

If we provide you with 'personal advice' we will consider your individual objectives, financial situation and needs when making our recommendation to you.

We will only provide services to you, with your prior, informed consent. If you do not understand any of the information in this FSG, or have any other questions relating to the terms on which we will be acting, please contact us.

In providing our services, other financial matters may arise, however, we are not authorised to assist with any financial and product services except those set out above. You should seek specific advice from the appropriate professionals on other matters relevant to you.

## **What fees and commissions are payable to us?**

All fees detailed in this FSG include GST and will be detailed in your SOA or ROA.

Your advice fee(s) will either be paid directly by you to LFC Group or paid (on your behalf) by the product issuer to LFC Group, as directed by you and in accordance with the Act.

LFC Group passes approximately 90% of the advice fee(s) to Invest Blue (**our practice**). Our practice employs advisers to provide advice. The advice fee(s) are then, in part, used to pay for adviser salaries. Our advisers may also be entitled to an annual bonus if they meet the following key performance indicators:

- company performance;
- professionalism and adherence to compliance procedures;
- completion of ongoing training;
- team performance; and
- Income generated.

Our practice has agreed this formula with your adviser and does not exercise discretion in paying it except where the revenue share paid to your adviser may be reduced if your adviser breaches regulatory or LFC Group's compliance obligations.

## **Service fees**

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. You may be charged a combination, or part of, any of these fees.

### **Initial consultation**

The initial consultation will be undertaken at our expense.

## **Fees for advice**

If you elect to pay us a fee for advice the following fees will apply. The fees will depend on the complexity of advice and the size of the investment portfolio:

The minimum fee charged is \$2,200 while the maximum fee is \$22,000.

For example, complex advice that contains multiple goals, multiple strategies and/or tax structures including but not limited to; self-managed superannuation funds, family trusts and companies, are likely to be charged closer to the maximum.

Less complex advice that addresses limited goals, single strategies and tax structures are likely to be charged closer to the minimum.

## **Ongoing advice fees**

If you require ongoing services, you will enter into a Client Service Agreement. Your fee will be calculated based on the complexity of ongoing advice and the services provided. Complex advice requirements include the use of trusts and ownership structures, overseas assets or incomes, executive options or multiple investment entities. The frequency of the review will also impact on the fee charged. The minimum fee is \$2,640 per annum while the maximum fee is \$45,000.

Details of the services and the quantum of the ongoing advice fees will be set out in your Client Service Agreement.

## **Life insurance commissions**

If you take out life insurance through us, LFC Group may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These commissions are included in the fees and premiums you pay for the product. They are not an additional cost to you. We may agree to rebate some or all of these commissions.

The initial commission is paid in the first year by the product issuer to LFC Group. Ongoing commissions are payments paid by product issuers to LFC Group in the years following the first year, while a policy is in place.

If you initiate an increase to your cover, LFC Group may receive an initial commission and ongoing commissions on the increase to your policy cost. The ongoing commission on a client-initiated increase is only paid in respect of the period that commences from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), LFC Group may receive up to 66% of your annual policy cost as a commission in the first year.

The ongoing commission is 22% of your annual policy cost.

## **Example**

The annual policy cost is \$1,000.00. LFC Group may receive up to \$660 (66%) as an initial commission in the first year. Assuming the policy cost stays the same each year, LFC Group may receive up to \$220 pa (22%) as an ongoing commission.

## **Referrals from a third party**

We have arrangements in place to pay a referral fee, commission, or other benefit to certain third parties when they refer new clients to us. Our current arrangements for referrals from a third party are set out in the table below and specific details of any benefit we provide in relation to our advice to you will be included in the advice documentation we provide to you.

**Table - Details of arrangements for referrals from a third party:**

Payment we provide for the referral	Example
1. A referral fee	1. \$40 Event Movie Voucher
2. An implementation fee	2. \$500 on written acceptance of the advice

### **Referrals to a third party**

We have referral arrangements in place with non-associated / non-related third parties. If we refer you to one of these providers there is no payment, fee, commission or other benefit received. We may also 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 the associated entity or related third party are set out 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 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 in relation to our recommendations to you.

Provider	Services	Payment arrangement
AIA Health	Private Health Insurance	LFC Group will receive remuneration of 20% (plus GST) of the client's first year premium, of which approximately 18% (plus GST) will be passed on to our practice, with the remaining approximate 2% (plus GST) to be retained by LFC Group.  For example, if the premium is \$1,000, the practice will receive \$180 and LFC Group will receive \$20.

### **Other business activities, associated entities and related third parties:**

LFC Group Pty Ltd and LFC Advice Pty Ltd (together, **LFC**) is wholly owned by Invest Blue Finance Pty Ltd ACN 661 784 541 (**Invest Blue Finance**), which is a wholly owned subsidiary of Invest Blue Pty Ltd ACN 001 874 744 (**Invest Blue Parent**). These parent entities have extensive related body corporates, associations and relationships with other financial planning credit, legal, insurance, aged care and accounting businesses.

Invest Blue is a wholly owned subsidiary of Ironbark Investment Partners Pty Ltd ACN 136 679 215 (**Ironbark**), which has interests in diversified financial services businesses.

LFC, through Invest Blue Parent, Ironbark, its own associations, relationships and/or its related body associations and relationships, may receive benefits by referring you to our related companies, related party products and or ancillary specialist services. If this is applicable to you, we will only do this where this is in your best interest and we will disclose the entity, product or service where we receive any additional benefit, or it is seen as a potential or perceived conflict in your advice documents such as your SOA or ROA.

Authorised representatives and/or staff employed in our business may also hold shares in Ironbark, whose revenue and profit and therefore dividends to shareholders, may be favourably affected by

provision of products or services that we and other Ironbark companies provide to you (which may include diversified financial services).

## **What arrangements may influence our advice to you?**

LFC Group and the practice has an Approved Product List which includes a range of financial products from product issuers not associated with LFC Group or the practice, and also may include financial products from product issuers that are associated with LFC Group or the practice.

From time to time, we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at between \$100 and \$300, and other benefits that relate to information technology, software or support provided by a product issuer, or that relate to educational and training purposes.

A copy of the register is available on request for a small charge.

## **What should you do if you have a complaint?**

If you have a complaint, you can contact us and discuss your complaint.

Please contact LFC Group's Complaints Manager using any of the contact details at the start of this FSG. We will respond to your complaint within **24 hours** and try and resolve your complaint quickly, fairly and within prescribed timeframes.

We will notify you of our decision in respect of the complaint within **30 calendar days** from the date of receipt of the complaint. If the complaint cannot be resolved to your satisfaction within 30 calendar days, you have the right to refer the matter to the Australian Financial Complaints Authority (AFCA). AFCA provides a fair and independent financial services complaint resolution that is free to consumers.

### **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  
GPO Box 3 Melbourne VIC 3001

## **Compensation arrangements**

We have arrangements in place to maintain adequate professional indemnity insurance as required by s912B of the Act. This insurance provides cover for claims made against us and our representatives, including claims in relation to the conduct of representatives who no longer work for us but who did so at the time of the relevant conduct.

# Privacy Policy and Collection Statement

## Introduction

LFC Group Pty Ltd, ACN 644 576 965 (referred to as **LFC Group**, we, our, us) is bound by the Privacy Act 1988 (**Privacy Act**), including the Australian Privacy Principles (**APPs**) and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by LFC Group, must abide by this Privacy Policy and Collection Statement (**Privacy Policy**). LFC Group makes this Privacy Policy available free of charge and can be downloaded from its website [www.investblueillawarra.com.au](http://www.investblueillawarra.com.au).

In this Privacy Policy:

- **Disclosure of information** means providing information to persons outside of LFC Group Pty Ltd;
- **Personal information** means information or an opinion relating to an individual, which can be used to identify that individual;
- **Privacy Officer** means the contact person within LFC Group Pty for questions or complaints regarding LFC Group Pty's handling of personal information;
- **Sensitive information** is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information; and
- **Use of information** means use of information within LFC Group Pty that complies with the provisions of our Privacy Policy and the Privacy Act.

## What kind of personal information do we collect and hold?

We may collect and hold a range of personal information about you to provide you with our services, including:

- name;
- address;
- phone numbers;
- email addresses;
- occupation;
- bank account details;
- driver's licence details;
- financial information, including details of:
  - your investments;
  - your insurance policies;
  - estate planning strategies;
  - taxation information; and
  - health information;

## How do we collect personal information?

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our products and services, including when you visit our website, use a mobile app from us, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, or marketing agencies. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We will not collect sensitive information about you without your consent, unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services, or meet your needs appropriately.

We do not give you the option of dealing with them anonymously, or under a pseudonym. This is because it is impractical, and, in some circumstances, illegal for LFC Group to deal with individuals who are not identified.

### **Unsolicited personal information**

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

### **Who do we collect personal information about?**

The personal information we may collect, and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact such as accountants, solicitors, insurance providers and lenders.

### **Website collection**

We collect personal information from our website [www.investblueillawarra.com.au](http://www.investblueillawarra.com.au) when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. You can view and access our Privacy Policy by clicking on the disclaimer & privacy button at the bottom of the home page on our website.

To use our website, you must consent to our use of cookies. You can withdraw or modify your consent to our use of cookies at any time. If you no longer wish to receive cookies you will need to web search on how to disable third-party cookies for your device and browser type. Please note that if you set your browser to refuse cookies, you may not be able to use or experience all the features of our website.

Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information. Cookies are small text files which are transferred to your computer's hard drive through your web browser that enables our website to recognise your browser and capture and remember certain information. This includes facilitating your use of, where applicable, keeping you signed in, understanding how you use our website and providing you content that is relevant to you.

Specifically, we use cookies for website analytics so we can understand aggregated website user behaviour, including where our website visitors are located and user interaction so that we can offer better user experiences. We do not pass any personally identifiable information through this function, however, the data we collect may be combined with other information.

## **Why do we collect and hold personal information?**

We may use and disclose the information we collect about you for the following purposes:

- provide you with our products and services;
- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business;
- You can let us know at any time if you no longer wish to receive direct marketing offers. Please email us at [illawarra@investblue.com.au](mailto:illawarra@investblue.com.au). We will process your request as soon as practicable.

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility; and
- any other information that we consider necessary.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

## **Who might we disclose personal information to?**

We may disclose personal information to:

- a related entity of LFC Group;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisers;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers and credit providers;
- anyone else to whom you authorise us to disclose it or is required by law; and
- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of 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 business services;
- your representatives or service providers 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 or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the APPs authorise the use or disclosure such as when it is required by or authorised under law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

### **Sending information overseas**

We may disclose personal information to third party outsourced providers that are located outside Australia in some circumstances. These recipients may be located in the following countries:

- Philippines

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than Australia. Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act and the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

### **Management of personal information**

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines: passwords are required to access the system and passwords are routinely checked;

- passwords are required to access the system and passwords are routinely checked;

- data ownership is clearly defined;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.

Where our employees work remotely or from home, we implement the following additional security measures:

- two-factor authentication is enabled for all remote working arrangements;
- password complexity is enforced, and employees are required to change their password at regular intervals;
- we ensure that employees only have access to personal information which is directly relevant to their duties;
- employees are not permitted to work in public spaces;
- we use audit trails and audit logs to track access to an individual's personal information by an employee;
- we monitor access to personal information, and will investigate and take appropriate action if any instances of unauthorised access by employees are detected;
- employees must ensure that screens are angled so that they cannot be used by anyone else, and are locked when not in use;
- employees must ensure that no other member of their household uses their work device;
- employees must store devices in a safe location when not in use;
- employees may not make hard copies of documents containing personal information, nor may they email documents containing personal information to their personal email accounts; and
- employees may not disclose an individual's personal information to colleagues or third parties, via personal chat groups.

## **Direct marketing**

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

## **Identifiers**

We do not adopt identifiers assigned by the Government (such as drivers' licence numbers) for our own file recording purposes.

## **How do we keep personal information accurate and up to date?**

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up to date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

## **Accessing your personal information**

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting the LFC Group's Privacy Officer. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

## **Updates to this Privacy Policy**

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

## **Responsibilities**

It is the responsibility of management to inform employees and other relevant third parties about this Privacy Policy. Management must ensure that employees and other relevant third parties are advised of any changes to this Privacy Policy. All new employees are to be provided with timely and appropriate access to this Privacy Policy, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Privacy Policy may be subject to disciplinary action.

## **Non-compliance and disciplinary actions**

Privacy breaches must be reported to management by employees and relevant third parties. Ignorance of this Privacy Policy will not be an acceptable excuse for non-compliance. Employees or other relevant third parties that do not comply with this Privacy Policy may be subject to disciplinary action.

## **Incidents/complaints handling/making a complaint**

We have an effective complaints handling process in place to manage privacy risks and issues.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business.

You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer.

If you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by contacting us using the details below:

Invest Blue  
Shop 3DD Lighthouse Lane  
145 - 149 King Street  
PO Box 256  
Warrawong NSW 2502  
**Phone:** 02 4276 2557  
**Fax:** 02 4276 2558  
**Email:** [illawarra@investblue.com.au](mailto:illawarra@investblue.com.au)  
**Website:** [www.investblueillawarra.com.au](http://www.investblueillawarra.com.au)

If you are not satisfied with our response to your complaint, you can also refer your complaint to the:

**Office of the Australian Information Commissioner**

**Website:** [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)  
**Phone:** 1300 363 992  
**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Australian Financial Complaints Authority (AFCA)**

**Website:** [www.afca.org.au](http://www.afca.org.au)  
**Phone:** 1800 931 678 (free call)  
**Email:** [info@afca.org.au](mailto:info@afca.org.au)

**Contractual arrangements with third parties**

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with *the Privacy Act*. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

**Your rights**

This Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information;
- you may ask us to provide an alternative means of identity verification for the purposes of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth);
- you may complain about a breach of the Privacy Act, including the APPs; and
- how we will deal with a privacy complaint.

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