BLENKHORN KIRKWOOD
FINANCIAL PLANNING

Life, unlocked

Northern Beaches Office:
Suite 27, Level 4, 1 Mona Vale Road,
Mona Vale NSW 2103

Sydney Office:
Level 32, 200 George St,
Sydney NSW 2000

Contact us:
02 9997 7007
info@blenkhornkirkwood.com
www.blenkhornkirkwood.com

ABN: 47 052 851 288
AFSL: 491551

Privacy Policy

Version 2025.1 , 1 December 2025

Australian Financial Services Licence (AFSL) No. 491551

Introduction

At Blenkhorn Kirkwood Financial Planning Pty Ltd ABN 47 052 851 288, Australian Financial Services Licence (AFSL) 491551, we are committed to protecting your privacy.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act'), and we manage and protect your personal information in accordance with the Australian Privacy Principles (APPs).

This policy describes how we collect, hold, share, use, and disclose your personal information under applicable Privacy Law. It also explains how you can access the personal information we hold about you, have that information corrected and complain about a breach of your privacy.

What personal information do we collect and hold?

'Personal information' means any details about you from which your identity is apparent or can be uncovered.

When we provide you with financial services under our licence, we collect and hold the personal information we need to provide those services to you. For example, we collect personal information when we undertake the fact-find process, complete an application for an investment or insurance, assist you with a claim under an insurance policy and review your circumstances. We need to collect a broad range of information including your name, address, contact details, age and details of your personal and financial affairs.

We may also collect sensitive information, such as medical history and health and lifestyle information, to provide financial advice about life insurance products.

How do we collect your personal information?

Generally, we collect this information directly from you. We may also collect information from third parties such as your bank, accountant, lawyer, insurers, companies you invest with and others such as:

- Another person or entity where you are covered under an insurance policy that covers more than one person or is taken out by someone you know;
- Organisations who help us verify your identity under the Anti-Money Laundering and Counter- Terrorism Financing Act 2006 (Cth);
- Other organisations, service providers (including software providers and IT services) or business partners who work with us to provide products or services to you; and
- People who refer you to us.

What is the main purpose for collecting, holding and disclosing personal information?

The main purpose for which we collect, hold, use and disclose personal information is to advise you about your personal financial goals and objectives and to arrange and manage your investments, superannuation, insurance, and any other matters you ask us to assist with.

Other purposes include to:

- Verify your identity;
- Manage your ongoing requirements, and our ongoing relationship with you and improve our services;
- Perform internal functions such as administration, accounting and information technology system requirements;
- Refer you to other organisations, service providers or business partners;
- Comply with legal and regulatory requirements, and prevent fraud or crime;
- Help us improve our services, develop our products and conduct research; and
- Send you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. You may opt out of this at any time by getting in contact with us.

We may communicate with you by email or post unless you tell us that you do not wish to receive such communications.

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How do we collect health information?

Health information is any personal information about your health or disability. It includes information or opinion about your illness, injury or disability.

Some examples of health information include:

- notes of your symptoms or diagnosis
- information about a health service you've had or will receive
- specialist reports and test results
- prescriptions and other pharmaceutical purchases
- dental records
- your genetic information
- your wishes about future health services
- your wishes about potential organ donation
- appointment and billing details
- any other personal information about you when a health service provider collects it

We may collect your health information where we advise you on insurance products. We do not use or share that information for any purpose other than the underwriting, application, pre- assessment or administration of your policy, claim or account or as otherwise notified to you when we collect your information. With your consent, some health information may be sourced by the life insurance company from you or your medical professionals.

How do we collect sensitive information?

Generally, we do not collect sensitive information about you unless required by law or where you explicitly consent for us to do so, and it is required for us to collect it to service you. We will not collect sensitive information about you where this is expressly prohibited by law. Sensitive information includes information relating to racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, health information, genetic information about an individual that is now otherwise health information or criminal records. We will not use sensitive information for direct marketing or any purpose other than the primary purpose of collection.

Which third-party applications that we use or recommend may collect your personal information?

We utilise third-party providers for specific functions, such as IT.

All providers we engage with are based in Australia and are therefore governed by the same Australian Privacy Principles and the Privacy Act as we are.

To whom will we disclose your personal information?

We may disclose your personal information to:

- Organisations you ask us to arrange investments with or through, including your tax file number;
- Your bank, accountant, lawyer, insurers, and other professional advisers, if you request us to liaise with them;
- Insurers you request us to arrange insurance with, including information about your health;
- Individuals or organisations who assist us in providing our services, including financial intermediaries from whom we obtain quotations, software providers, IT services and hosting, cloud storage providers, marketing, communication, administration and paraplanning services, compliance consultants and auditors;
- Organisations who help us verify your identity;
- Other organisations, service providers or business partners whom we consider may provide services or products you would find useful or who provide you with products or services along with us;
- Other companies or individuals, such as business brokers or agents, in the event of a corporate sale, merger, reorganisation, dissolution or similar event.
- Regulatory bodies, government agencies or law enforcement bodies; and
- Anyone else we are permitted to or required to provide information to by law.

Our engagement letter will seek your consent to disclose your information in this way at the inception of your client relationship with us.

We do not sell, trade, or rent your personal information.

We may engage services of organisations based overseas or in Australia but store data overseas or access services overseas. Some of the organisations we may disclose to may be located overseas and include, but are not limited to, United States of America, United Kingdom, Philippines, India, China, Serbia, Vietnam, and/or Sri Lanka. Where Personal Information is disclosed to these overseas locations, we expect these organisations to comply with this Policy and any relevant privacy laws and regulations applicable to their jurisdiction. If you are concerned about how these organisations handle your information, we suggest that you carefully read their Privacy Policy to determine the extent to which they send information overseas.

What if you don't provide some personal information to us?

The effectiveness of our services is specifically dependent on information you provide and it being relevant, complete, accurate and up-to-date. Without this, our services may not meet your needs or may result in unforeseen financial consequences. If you elect not to provide us with your personal information, as and when requested, we may not be able to provide you with services.

How do we store and protect your personal information?

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected, to enable us to respond to any questions after the end of our relationship and to comply with any applicable legal or ethical reporting or document retention requirements. This will generally be 7-10 years.

We hold the information we collect from you in physical and electronic records, which may be stored at our premises, our service providers' premises, in secure data centres or the cloud.

We use a range of physical and electronic security measures to protect your information from misuse, interference, loss, unauthorised access, modification or disclosure.

Web and mobile data

Analytics data – Our various software and IT service providers may provide analyses of how our clients use these services, e.g. how clients respond to marketing communications or use our personal wealth application.

Web data – We may use technology such as cookies, beacons, tags, scripts and tracking pixels to collect, store and use anonymous data about how you use our website and interact with our emails. This includes your server address, the date and time of your visit, the pages and links accessed, the type of browser used and other information about your browsing activities. This data is used to increase functionality and can also enable us to display information and content that is tailored to our understanding of your interests.

How can you check, update or change the personal information we hold?

You can request us to provide you with access to your personal information we hold about you by sending us an email. To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete, or out of date, and we will take reasonable steps, in the circumstances, to ensure that it is corrected.

We may charge a reasonable fee to cover the cost of providing access to your personal information, but we will not charge for correcting your information.

In some limited cases, we may need to refuse access or a request for correction. We will advise you as soon as possible if this is the case and the reasons for our refusal.

Marketing material

Periodically, we may promote newsletters, information, products, services or opportunities that we believe may be relevant to you. You can inform us if you do not wish to receive marketing material from us; you can do this via email. The ability to opt-out does not include disclosure documents or important communications that your adviser will send you. If you wish to opt out of marketing material, we will implement this for you within 30 days.

How to make a privacy complaint

We take your privacy seriously. If you have a complaint about your privacy, please write to us using the contact details shown below. Blenkhorn Kirkwood has procedures in place to deal with complaints fairly, transparently and quickly. We will try to respond with a decision within 30 days of you making the complaint.

If your complaint is not resolved, you may refer it to the Australian Financial Complaints Authority (AFCA), which can be contacted:

- by phone at 1800 931 678,
- by email at info@afca.org.au
- by post at Australian Financial Complaints Authority Limited GPO Box 3 Melbourne, VIC 3001.
- by fax at (03) 9613 6399

Alternatively, you can refer your complaint to the Office of the Australian Information Commissioner, who can be contacted by phone at 1300 363 992, by email at enquiries@oaic.gov.au, or by post at GPO Box 5218, Sydney NSW 2001.

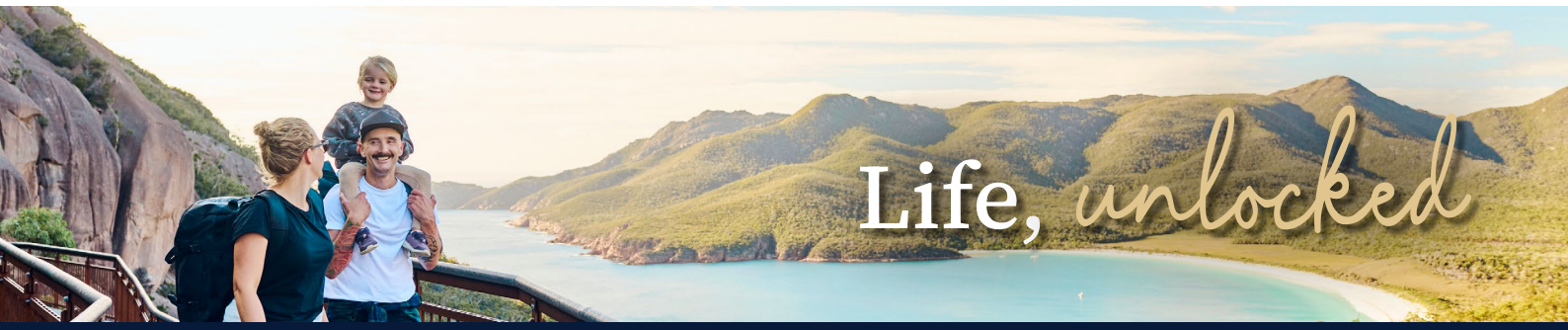
If your complaint reasonably requires us to contact a third party, we may need to give some of the information contained in your complaint to that party.

Updating this Policy

We may update this Privacy Policy at any time by publishing it on our website.

Contact Details

Our contact for requests for access and alterations, concerns or complaints or questions and comments is:

Mail: The Complaints Manager
Blenkhorn Kirkwood Financial Planning Pty Ltd
PO Box 1253, Chatswood NSW 2057

Phone: 02 9997 7007
Email: info@blenkhornkirkwood.com
Website: www.blenkhornkirkwood.com