

Group Privacy Policy

Privacy Policy – V2. Revised August 2026
issued by Prosperity Services Pty Ltd

Prosperity Wealth Advisory Services Pty Ltd
(AFSL# 533675 ACN 629 890 642)

Prosperity Services Pty Ltd (“we”, “us”, “our”) its subsidiaries and related entities have established this privacy policy to outline how we manage your personal information.

prosperity.com.au

Sydney

Level 11
309 Kent Street
Sydney NSW 2000
02 8262 8700

Newcastle

Level 6
26 Honeysuckle Drive
Newcastle NSW 2300
02 4907 7222

Brisbane

Level 18
333 Ann Street
Brisbane City QLD 4000
07 3007 1900

ABOUT US

Prosperity Services Pty Ltd ("we", "us", "our" "PAG") its subsidiaries and related entities have established this privacy policy to outline how we manage your personal information.

We provide accounting, taxation, business advice, corporate assurance, financial services, lending, wealth management, salary packing, novated leasing and related professional services. Certain Prosperity divisions may have their own privacy policies where their services involve different types of personal information or information handling practices. Where applicable, those policies operate in addition to this Group Privacy Policy.

We are committed to protecting your privacy and handling your personal information in accordance with the *Privacy Act 1988 (Cth)*, including the Australian Privacy Principles (APPs), and other applicable laws

We take reasonable steps to ensure that the personal information we collect, use, share and may hold is limited to what is reasonably necessary to comply with our legal obligations and functions of our firm.

INFORMATION WE COLLECT

We aim to only collect personal or sensitive information necessary to provide our service across our divisions including but not limited to:

- Personal and contact details – name, address, phone number, email
- Proof of identity – Passport, medicare card, drivers' licence, pension card, tax file number, certificate of birth, death and marriage, visa
- Details of your financial situation, needs and objectives;
- Resume or job application
- Financial information relating to your assets and liabilities (both actual and potential), income, expenditure, account activities, insurance cover, estate planning and superannuation,
- Employment details such as occupation, employment history
- Details of your Business – ABN#, Business Name, Principal place of business, beneficial owners
- Sensitive information which can relate to your health, only where necessary or permitted
- Digital information – when you use our services, we may collect information such as your IP address
- Records created during engagement (emails, advice, file notes)
- Information in any review or comment made on our social media platforms

In some cases, we may collect sensitive information, including;

- Identity verification data
- Biometric information used for biometric identity verification or identification
- Biometric checks are based on a photograph 'selfie' of your face. We will always ask you separately for your expressed consent prior to collecting your 'selfie'. Your photograph will be shared with our identity service providers for the purpose of performing the relevant identity check.

HOW WE COLLECT

We collect personal information:

- Directly from you during engagements, onboarding, advice or service delivery
- In person, through forms, enquiries, competitions, meetings, phone calls
- From third parties where reasonably required, including:
 - Employers (salary packaging, novated leasing and leasing)
 - Financial institutions, lenders and insurers
 - Professional advisers (e.g. lawyers, brokers)
 - Publicly available information (such as Australian Information and Investments Commission registers)
 - Through digital platforms, social networking services, and Australian Government Identifiers
- Event registrations, competitions and cross-servicing referrals

PURPOSE OF COLLECTION

We collect, hold, use and disclose personal information that is necessary for us to provide you with a product or service such as:

- Provide financial solutions, advice, investment strategies
- Respond to your enquiry or request
- Preparation of Financial Statements and tax returns
- Provide accounting, taxation, business advisory
- Deliver financial advice & plans, wealth management and insurance services
- Arrange and manage lending, finance and banking solutions
- Administer salary packaging, payroll, novated leasing and employee benefit programs
- Assess applications and eligibility for financial products
- Managing your expenses and income tax
- Manage transactions, applications and engagements
- Manage our relationship with you and or your business
- Verify your identity, conduct checks and assess risk
- Assess your lending capacity
- Conduct business risk assessment, quality audit and assurance
- Provide internal training, business analytics, and improve our business and services
- Comply with legal and regulatory obligations including:
 - Anti Money Laundering and Counter Terrorism Financing Act 2006 (Cth)
 - Corporations Act
 - Tax and corporate laws
 - Financial services and credit regulations

DISCLOSURE OF INFORMATION

As part of the service delivery and to manage risk and compliance, we may disclose your personal information within our group. We hold offices in Australia and Manila and the broader Asia Pacific region. We may also disclose your personal information to:

- service providers, including IT platforms including technology and cloud providers
- third party providers, including professional advisers, insurers, financiers or auditors
- financial institutions and counterparties
- business partners, authorised representatives and co-applicants
- regulators and government bodies (including AUSTRAC)

In some instances, we may link to or embed content from third-party providers (for example, external websites or applications). These third parties may independently use cookies or similar technologies when you interact with their services. We do not control these technologies and are not responsible for their use. We encourage you to review the privacy policies of any third-party providers you engage with.

Where we outsource services that require the disclosure of your Personal Information to an overseas recipient, we will take reasonable steps to ensure, by contract or otherwise, the recipient complies with the Australian Privacy Principles. We do not accept responsibility for any act or omission by those providers this is outside of our control.

To verify your identity, we use a third-party provider who processes and stores your personal and sensitive information using Google Cloud Platform in the European Union (Dublin/Frankfurt) and Australia.

Data is retained only for as long as necessary. All photographic identity information (such as 'selfies') will be destroyed after verification is complete.

ACCESS AND CORRECTION

If you believe or become aware, that any personal information we hold is incorrect, incomplete or inaccurate, you should contact our office and request amendments to your details. You may request correction of the personal information that we hold about you at any time by contacting us.

In some circumstances, we may not be able to provide access, as permitted by law. We will provide you with a written notice that sets out the reasons for the refusal.

You have the option to opt out or unsubscribe, to receiving direct marketing communications from us at any time.

ANONYMOUSLY

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone our office without identifying yourself and make a request.

STORAGE AND SECURITY

Our staff are trained in line with Australian privacy laws and our internal policies to ensure your personal information is handled safely and securely. We use secure systems, facilities and data centres located within Australia and The United States of America to store and protect your information.

We take reasonable steps to protect your personal information from misuse, leaks, interference and loss, and from unauthorised access, modification or disclosure.

This includes but not limited to:

- secure systems and access controls
- role-based permissions
- encryption and multi-factor authentication
- confidentiality obligations and staff training
- monitoring and security governance processes

We maintain governance frameworks to ensure information is managed appropriately across the Group. Where appropriate and permitted by law, we take reasonable steps to securely destroy or de-identify personal information when it is no longer required for the purpose for which it was collected or to meet our legal and regulatory obligations.

Our commitment to complying with the Australian Privacy Principles helps reduce the risk of unauthorised access to, misuse of, or loss of personal information throughout its lifecycle, including its collection, storage, use, disclosure, and disposal.

Despite the safeguards we have in place, no method of transmitting or storing information is completely secure. In the unlikely event of a data breach involving personal information that is likely to result in serious harm, we will respond in accordance with our Data Breach Response Plan and applicable legal obligations, including the Notifiable Data Breaches scheme under the *Privacy Act 1988* (Cth). Where required, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) and provide information about steps that may be taken to reduce the risk of harm.

USE OF AI TOOLS

We may use automated systems, including artificial intelligence (AI) and data analytics tools, to support productivity, processes and record-keeping. This may involve the recording of meetings via our provider, to generate transcripts, summaries, or written minutes. Further use may be assisting with communications, summarising notes and automating workflows.

We maintain practices, procedures, and systems designed to ensure compliance with privacy obligations, including the responsible use of AI technologies. In line with APP 5, you will be notified, or otherwise made aware, when your personal information is being collected and recorded for documentation purposes.

Where AI systems may collect sensitive information, consent will be obtained prior to recording wherever practicable.

These tools may be used for:

- automating workflows
- assisting with communications
- recording, transcribing and providing summaries of meetings
- risk assessment and fraud detection
- compliance monitoring

We take reasonable steps to ensure these technologies are used responsibly, securely and in accordance with applicable laws. All decisions are subject to human oversight and professional judgement.

ANTI-MONEY LAUNDERING AND COUNTER TERRORISM FINANCING

We are required to comply with the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth) and associated rules (AML/CTF Framework) in relation to certain services we provide to you.

We are required by the AML/CTF Framework to conduct client due diligence and to collect and verify information about you and other relevant persons before, and during, the course of our engagement. This may include establishing and verifying your identity, beneficial ownership and control (including for companies and trusts), information concerning the nature and purpose of our engagement and your business activities, transactions and information regarding the source of funds or wealth.

We may be required to undertake ongoing monitoring of our engagement with you and to request updated or additional information from time to time. You agree to comply with any such requests.

We may be required to lodge reports to regulatory authorities (eg Australian Transaction Reports and Analysis Centre AUSTRAC) and any other reports required by law.

Any information collected by us under this clause will be retained in accordance with the AML/CTF Framework, *The Privacy Act 1988* (Cth) and other applicable laws. We are required to retain records obtained under the AML/CTF Framework for seven (7) years.

CONFIDENTIAL INFORMATION

At times we are required to disclose your personal information

- where disclosure is expressly permitted under this Policy
- to the extent either party is bound to comply with any law; or
- where confidential information has entered the public domain other than as a result of a breach of this Policy.

COMPLAINTS AND CONTACT DETAILS

If you feel we have breached your rights under the *Privacy Act 1988* (Cth) (in particular the Australian Privacy Principles) or we have not abided by this Privacy Policy you can contact us, as listed under the contact details below. Your complaint will be considered within 7 days and responded to within 30days.

We request complaints about breaches of privacy be made in writing, so we can be sure about the details of the complaint.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

CONSENT

This policy is issued in accordance with applicable laws and regulatory requirements. It is not intended to constitute a legally binding contract between you and us.

However, certain agreements entered into between you and Advisory Partner may incorporate all or part of this policy by reference. In those circumstances:

- specific provisions of this policy may form part of the relevant agreement,
- those incorporated provisions are intended to create obligations for you, but do not impose corresponding contractual obligations on Advisory Partner, and
- any consents you provide under this policy will operate as binding contractual consents for the purposes of that agreement.

By accessing or using our website, or by engaging us to provide services or products, and where this policy has been made available to you (whether directly or by reasonable access), you acknowledge and agree that:

- you provide the consents set out in this policy;
- you have been informed of, and accept, the matters described in this policy; and
- if you do not provide the personal information requested, or withdraw any required consent, this may limit or prevent our ability to provide you with our services or products.

ADDITIONAL PRIVACY INFORMATION

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Australian Privacy Commissioner at www.oaic.gov.au.

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

CONTACT DETAILS

If you have any questions about this Privacy Policy or any concerns, they may contact our Privacy Officer using the details set out below. Individuals can write to:

Attn: Privacy Officer

E: compliance@prosperity.com.au

T: (02) 4907 7222

F: (02) 4929 6759

PO Box 234

NEWCASTLE NSW 2300