



MARINIS
FINANCIAL GROUP

Privacy Policy

Who we are

We are Financial Strategies (SA) Pty Ltd, trading as Marinis Financial Group.

ABN (54 083 005 930)
AFSL (326403)
Level 1, 11 Halifax Street
Adelaide SA 5000

Caveo Partners Holdings Pty Ltd (CPH) is the owner of Financial Strategies (SA) through 100% ownership of Blue Baron 62. Theo Marinis as a director and shareholder of CPH will receive dividends from CPH.

Financial Strategies (SA) Pty Ltd, trading as Marinis Financial Group: These entities are collectively referred to in this document as Marinis.

What is the purpose of this policy?

This policy provides you with information about:

- The personal information that Marinis collects about you
- How we handle your information, including how we use, disclose and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information.

As a business operating in Australia, we are required to adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), which regulate the collection, storage, use, and disclosure of personal and sensitive information. In addition, they also give individuals the right to access and correct any personal information that we have collected about them.

What information do we collect, and why?

We only collect personal information that is required for us to provide financial services to you and to satisfy our own legal obligations as the holder of an Australian Financial Services Licence. Typically, we will collect this information directly from you, using a combination of meetings and questionnaires. We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

We do not utilise any standard personal identification reference numbers (such as Tax File, Medicare or Centrelink numbers) as identifiers.

The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original or certified copy of your drivers' licence, passport or other primary identification,
- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances, and
- Information about your financial needs, goals and objectives.

It is important that you provide us with complete and accurate information, as we use this to develop appropriate strategies and research suitable financial products that suit you. While we will take all reasonable steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you choose to give us incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

We may record client meetings and use an AI tool to produce a transcript and file note of the meeting, and other documents such as internal instructions to follow up agreed actions after the meeting. As with all your information, the transcripts and file notes use secure software and are stored in accordance with our stringent data security.

We will always advise you when we intend to record a meeting and seek your explicit consent to do so prior to starting the recording. You may decline to have any meeting recorded if you are not comfortable.

How will your information be stored?

We store all personal information in electronic format in facilities we own, or in secure cloud-based storage. Hard copy paper files are stored securely with access restricted only to those staff who require your information to provide our financial services.

We maintain high data security standards to reduce the risk of unauthorised access to your information. However, should a data breach occur, we will contact you to notify you of the information that was compromised. In certain data breach situations, we will also be required to report to the Office of the Australian Information Commissioner.

Any original documents given to us will be returned to you after we have scanned them. We are required to retain most records for at least 7 years, or longer where legally required.

How will we use and disclose your information?

We only use and disclose your personal information for the purpose of providing you with financial services, to carry on our financial services business compliantly and to seek legal advice about our affairs.

The information we collect will be used to develop an appropriate financial strategy to achieve your short, medium and long-term goals, and determine which financial products (if any) should be acquired or replaced. Our support staff and outsourced contractors will have access to this information as required to assist with the development of your financial strategy. From time to time, secure AI software may be used to create administrative efficiencies, for instance reporting on pending client administration and back office tasks, and creating correspondence following a meeting which has been recorded with your consent.

Where we accept your instruction to acquire a financial product, we will disclose your relevant personal information to the financial product issuer.

We may also disclose your information to other third parties where required to deliver our financial services to you, or as required by law. These parties include issuers of financial products, life risk insurers, outsourced service providers such as paraplanning, administration support, auditors, accountants, or quality assurance. We do not currently share data with any offshore service providers.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

How can you access or correct the information we hold about you?

We will take reasonable steps to ensure that the personal information we hold about you is accurate, up to date, relevant and complete, including when it is used or disclosed. If you identify inaccuracies with the information we hold, or there are changes to your circumstances, you can contact us to correct or update the information we hold. If we do not agree with your corrections, we may refuse to update the personal information, in which case we will provide you with a written explanation as to why.

The Privacy Act allows you to seek access to your personal information. To request access, please contact our Privacy Officer on 08 8130 5130 or admin@marinisgroup.com.au. There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

Our Website and Cookies

When visiting our website, a record of your visit is logged. We **do not collect personal information** purely from your visit to our website.

The following clickstream data is recorded and is used by us for statistical purposes:

- your IP address
- your top level domain name (for example, .com, .gov, .au, .uk)
- the type of browser you are using
- your operating system (for example, Windows, Mac)
- the date and time of your visit to the site
- the pages accessed and the documents downloaded
- the internet address of the site from which you were linked directly to our site.

Clickstream data is anonymised and no attempt will be made to identify users or their browsing activities except in the unlikely event of a data breach, or an investigation where a law enforcement agency or other government agency may exercise its legal authority to inspect our internet web server logs.

Our website uses cookies to better serve you when you return to the website. A cookie is a piece of data that a site can send to your browser, which may then be stored on your computer as an anonymous tag that identifies your computer but not you.

You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies. If you do so, some pages in the site may not work properly.

Cookies are either persistent or session based. Persistent cookies are stored on your computer, contain an expiry date, and may be used to track your browsing behaviour upon return to the issuing site. Session cookies are short-lived, are used only during a browsing session, and expire when you quit your browser. Our site uses both kinds of cookies to provide a rich and session-based experience. The cookies are used to enable us to track anonymised users' browsing patterns in order to provide statistical information to improve the usability of the site.

How can you complain about our handling of your information?

If you have a complaint about how we have collected, used or stored your personal information, you can direct your complaint to our Complaints Manager at admin@marinisgroup.com.au. Alternatively, you may contact the Office of the Australian Information Commissioner by submitting a complaint through the online form on their website: oaic.gov.au/privacy, or by contacting them at:

Privacy Complaints
GPO Box 5288
Sydney NSW 2001

Phone: 1300 363 992
Fax: 02 6123 5145.