

VINARC



**VINARC ONLINE
PRIVACY POLICY
2021**

Vinarc Pty Ltd
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0408 155 140

ONLINE PRIVACY POLICY

INTRODUCTION

1.) This Privacy Policy is VINARC Pty Ltd's official online privacy policy and it applies to all personal information collected by financial advice firms trading under Vinarc Pty Ltd AFSL (484222). In this policy we explain how and why we collect your personal information, how we use it, and what controls you have over our use of it.

2.) Vinarc Pty Ltd is committed to complying with Commonwealth legislation governing privacy of personal information by businesses and to protecting and safeguarding your privacy when you deal with us.

COLLECTION OF INFORMATION

3.) Some information provided to us by clients, customers, contractors and other third parties might be considered private or personal. Without these details we would not be able to carry on our business and provide our services to you. We will only collect such personal information if it is necessary for one of our functions or activities.

4.) In particular, personal information is collected from people in the following situations by financial advice firms trading under Vinarc Pty Ltd:

- If you contact our Advisers or their financial advice firms, we may keep a record of that correspondence.
- When you submit your e-mail address to any of our advisers web site mailing list.

5.) At or before the time the personal information is collected by us we will take reasonable steps to ensure that you are made aware of who we are, the fact that you are able to gain access to the information held about you, the purpose of the collection, the type(s) of organisations to which we usually disclose the information collected about you, any laws requiring the collection of the information and the main consequences for you if all or part of the information is not collected.

USE OF INFORMATION COLLECTED AND DISCLOSURE OF PERSONAL INFORMATION TO OTHERS

6.) We may use or disclose personal information held about an individual for the primary purpose for which it is collected (eg. provision of our services, including administration of our services, notification to you about changes to our services, record-keeping following termination of our services to you and technical maintenance). We may also use such information for a purpose related to the primary purpose of collection and where it would reasonably be expected by you that we would use the information in such a way. This information is only disclosed to persons outside our business in the circumstances set out in this policy or as otherwise notified to you at the time of collection of the information.

7.) In addition we are permitted to use or disclose personal information held about you:

- Where you have consented to the use or disclosure;
- Where we reasonably believe that the use or disclosure is necessary to lessen or prevent a serious, immediate threat to someone's health or safety or the public's health or safety;
- Where we reasonably suspect that unlawful activity has been, is being or may be engaged in and the use or disclosure is a necessary part of our investigation or in reporting the matter to the relevant authorities;
- Where such use or disclosure is required under or authorised by law (for example, to comply with a subpoena, a warrant or other order of a court or legal process);

Where we reasonably believe that the use or disclosure is reasonably necessary for prevention, investigation, prosecution and punishment of crimes or wrongdoings or the preparation for, conduct of, proceedings before any court or tribunal or the implementation of the orders of a court or tribunal by or on behalf of an enforcement body.

SECURITY AND STORAGE

8.) Vinarc Pty Ltd and the financial advice firms trading under Vinarc Pty Ltd place a great importance on the security of all information associated with our customers, client's and contractors. We have security measures in place to attempt to protect against the loss, misuse and alteration of personal information under our control.

9.) Personal information is de-identified or destroyed securely when no longer required by us.

10.) The advice firms trading under Vinarc Pty Ltd retain the information you provide to us including possibly your contact and credit card details to enable us to verify transactions and customer details and to retain adequate records for legal and accounting purposes. This information is held on secure servers in controlled facilities.

11.) Information stored within our computer systems can only be accessed by those entrusted with authority and computer network password sanctions.

12.) No data transmission over the Internet can be guaranteed to be 100 per cent secure. As a result, while we strive to protect user's personal information, the advice firms trading under Vinarc Pty Ltd cannot ensure or warrant the security of any information transmitted to it or from its online products or services, and users do so at their own risk. Once the advice firms trading under Vinarc Pty Ltd receive your transmission, it makes every effort to ensure its security on its systems.

13.) Ultimately, you are solely responsible for keeping your passwords and/or account information secret. You should be careful and responsible whenever you are online.

ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

14.) Vinarc Pty Ltd is committed to maintaining accurate, timely, relevant and appropriate information about our customers, clients and web-site users.

15.) So long as your request for your personal information is in accordance with the National Privacy Principles, then we will give you access to that information.

16.) Inaccurate information will be corrected upon receiving advice to this effect from you. To ensure confidentiality, details of your personal information will be passed on to you only if we are satisfied that the information relates to you.

17.) If we refuse to provide you with access or correct the personal information held about you by us, then we will provide reasons for such refusal.

COMPLAINTS

18.) If you have a complaint about our Privacy Policy or the collection, use or safe disposal or destruction of your personal information, your complaint should be directed in the first instance to us at

E-mail: admin@vinarc.com.au
Phone: 0408155140
Email: admin@vinarc.com.au
Mail: Managing Director
Vinarc Pty Ltd
Level 33, 264 George Street
Sydney NSW 2000

If you have a complaint about any financial service provided to you by your adviser, you should take the following steps:

- a. We will acknowledge receipt of a complaint immediately, however, where this is not possible, acknowledgement will be made as soon as practicable.
- b. We will then investigate the complaint and respond to you within 45 days. From the 5th October 2021 this timeframe will be reducing to 30 days, meaning you will be responded to within 30 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution.
- c. If you are not fully satisfied with our response, you have the right to lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers. Contact details for AFCA are:

Phone: 1800 931 678 (free of charge)
Online: www.afca.org.au
Email: info@afca.org.au
Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne, VIC, 3001

TRANSFER OF INFORMATION OVERSEAS

19.) Pursuant to the National Privacy Principles we may transfer personal information we have collected about you to someone other than you in a foreign country only if such transfer is permitted by the National Privacy Principles.

CHANGES TO PRIVACY POLICY

20.) If Vinarc decides to change its Privacy Policy, it will post changes on this Privacy Policy page so that users are always aware of what information is collected, how it is used and the way in which information may be disclosed. As a result, please remember to refer back to this Privacy Policy regularly to review any amendments.

CONTACTING US

21.) If you require further information regarding our Privacy Policy, please contact us at the following address:
E-mail: admin@vinarc.com.au

22.) Should you wish to read more information on privacy legislation or the National Privacy Principles we recommend that you visit the Federal Privacy Commissioner's website at www.privacy.gov.au

ACCEPTANCE

23.) You accept that your use of this service includes your acceptance of this Privacy Policy and the Terms and Conditions