NAVIGATE

FINANCIAL

Privacy Policy

Manly:
Suite 4, 2/2 Pittwater Rd, Manly NSW 2095

Chatswood:
Tower 1, Level 2/495 Victoria Avenue,
Chatswood NSW 2067

Central Coast:
13 Kerta Road, Kincumber NSW 2251

Sydney:
Level 14, Angel Place, 123 Pitt Street,
Sydney NSW 2000

ABN:
61 132 593 858

Call Us:
02 9977 2244

Find Us:
navigatefinancialwealth.com.au

Privacy Policy

It is important for us to help our clients, and to do so, we need to collect their personal data, including, but not limited to—their details

(Name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, health information, employment details and domicile and citizenship status).

To prepare each client's strategy and provide appropriate assistance, we may sometimes need to engage third parties (for example, to prepare a quote, model a strategy, or send paperwork for signature).

In addition, certain laws require us to collect personal information, including:

- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)
- Corporations Act 2001 (Cth)
- National Consumer Credit Protection Act 2009 (Cth)
- U.S. Foreign Account Tax Compliance Act

Our Contact Details:

Suite 4 2/2 Pittwater Road Manly NSW 2095

Manly@navfinancial.com.au

(02) 9977 2244

Direct Marketing

We may also use and disclose your personal information to keep you informed about the range of financial products and services provided by Navigate Financial. Opt out options available.

Impact of Withholding Information

Providing your information is optional. However, if you choose not to provide certain details, we may be unable to deliver specific products or services, verify your identity to protect against fraud, or accurately assess your personal circumstances. This may impact the quality, suitability, or availability of the advice or services we can provide.

Sensitive information

We understand that some personal information is more sensitive in nature. **"Sensitive information"** includes details about your:

- Health or medical history
- Racial or ethnic origin
- Political opinions or membership
- Religious or philosophical beliefs
- Sexual orientation or practices
- Criminal record
- Biometric and genetic information
- Membership of trade unions or professional associations

We will only collect sensitive information where it is necessary for us to provide you with financial services, and only with your explicit consent, or where required or authorised by law.

For example, we may need to collect health information when arranging insurance policies, or details of criminal history if required for lender assessments. Any such information is handled with a higher level of care and confidentiality.

We do not use sensitive information for direct marketing purposes. We will take reasonable steps to ensure sensitive information is:

- Collected directly from you *(unless it is unreasonable or impracticable to do so)*
- Used only for the primary purpose for which it was collected
- Securely stored and protected against unauthorised access or misuse

You may withdraw your consent to the collection or use of sensitive information at any time. However, doing so may impact our ability to provide certain services, such as insurance advice or loan applications.

If you have any concerns about the collection, use or storage of sensitive information, please contact our office on **(02) 99772244.**

How we collect information

Navigate Financial will collect your personal information directly from you where is reasonable and practical.

This information is gathered either through applications or other forms completed by you, or by recording information you provide via phone calls, interviews and other forms of communication. We may also collect personal information from external sources. Examples of the people or organisation who may provide us with information are:

- Employers, when a new employee joins their superannuation or insurance plan
- Parents or guardians in respect of children
- People authorised by you *(such as lawyers or accountants)*
- Other credit providers
- Public sources of information *(such as telephone directories)*
- Market research organisations *(through surveys or telephone polls)*
- Third-party brokers *(such as insurance and mortgage brokers)*
- Credit reporting bodies your information may be disclosed as required or authorised by law and to anyone authorised by you.

When we are provided with personal information about an individual from a third party, we seek to ensure the individual is aware of certain matters, such as Navigate Financial's identity and contact details. Can you remain anonymous or use a pseudonym when dealing with us? If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However, in many cases, it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

Information Protection

Regardless of data collection method used, Navigate Financial has methods in place to store your information securely. We hold your personal information in a combination of secure computer storage facilities, paper-based files and other formats. We have a number of procedures in place to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff and financial advisers who handle personal information to respect the confidentiality of customer information and the privacy of individuals.

Who do we share personal information with?

From time to time, we may share your personal information with other entities both within and outside of Navigate Financial.

The entities that we might share your personal information with vary according to the product or service involved but could include: other areas and organisations within the Navigate Financial entities that provide financial and other services, for reasonable business purposes accountants, advisers, brokers and other parties authorised or employed by one of our business (Navigate Manly Pty Ltd, Navigate Loans Pty Ltd or Navigate Accounting Practice Pty Ltd) and/or companies service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance or research services, some of whom may contact you on our behalf insurers, including reinsurance companies and credit providers courts, tribunals and other dispute resolution bodies during a dispute credit reporting or reference agencies employers contributing to or otherwise participating in our superannuation plans anyone authorised by you or to whom you have provided your consent (either expressly or impliedly).

Including but not limited to other financial services providers that we may need to deal with on your behalf anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service) other financial services institutions - to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

Overseas Data Sharing

Some of the entities we share information with may be located in, or have operations in, other countries. The current list of countries or regions to which your personal information could be sent is set below. Appendix: The current list of countries and regions to which your personal information could be sent is set out below: Administration, research and other financial services and specialist advice Philippines & India We normally require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles. Some financial planners or advisers in the licensee's group may enter their own outsourcing arrangements to countries other than those in the table above. Those arrangements will be disclosed separately by the financial planner or adviser to their clients.

Updating Personal Information

We realise that your personal information changes frequently – people move house, change jobs and update other personal circumstances on an ongoing basis. In most cases you can alter your details over the telephone or via the Navigate Financial website. If we believe the information we hold is incomplete or out of date, we may also seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

Time Length of Storage

We may be legally required to maintain some of your records for a significant period of time. However, once we believe information is no longer needed, we may remove any identifying details or destroy the records entirely.

How Can You Contact Us About Privacy?

Call: (02) 9977-2244

Email: marketing@navfinancial.com.au

Or Write To Us:
Customer Service PO Box 677 Manly 1655 NSW 2095

To seek more information about anything contained in this policy, or to request a printed copy of this policy update or correct your personal information opt out of receiving direct marketing material ask about accessing or correcting the personal information we hold about you; or make a privacy-related complaint.

How Do You Find Out About Your Personal Information We Hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us (see how you can contact us about privacy). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time. There are some situations where we are allowed to refuse or limit your access to information, for example when the information is commercially sensitive. If that happens, we'll write to you and let you know why. There is no charge for requesting to access your personal information. However, in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish to proceed.

How Can You Escalate Unresolved Privacy Complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to the Navigate Financial Compliance Manager by email complaint@navfinancial.com.au or write to: The Practice Manager, 2/2 Pittwater Road, Manly NSW 2095. Alternatively, you can contact an external body.

Australian Information Commissioner	If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner-call **1300 363 992** or find them online at **oaic.gov.au.**
Australian Financial Complaints Authority	If your complaint is about the products and services we provide you can contact the Australian Financial Complaints Authority- call **1800 931 678.** In writing to Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001 or online at **info@afca.org.au**. There may be a time limit for referring your complaint to AFCA. You should contact them or visit their website for more details.

How Can You Make a Complaints About Privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed above. We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. We'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding this matter.

About This Policy

This policy is effective from 1 July 2025. We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy or contact us for a printed copy. This policy applies to the following entities within the Navigate Financial group operating in Australia.

Navigate Manly Pty Ltd | Navigate Loans Pty Ltd | Navigate Accounting Practice Pty Ltd

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