

# Bongiorno Privacy Policy

**Bongiorno Financial Advisers Pty Ltd**  
Australian Financial Service Licence No. 238977

**ABN 33 058 918 595**

**Bongiorno Private Clients Finance Pty Ltd**  
Australian Credit Licence No. 493404

**ACN 612 938 771**

## 1. Introduction

Bongiorno Financial Advisers Pty Ltd and Bongiorno Private Clients Finance Pty Ltd (collectively "Bongiorno") is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the *Privacy Act 1988 (Cth) (Privacy Act)*.

This Privacy Policy explains how Bongiorno handles personal information and does not cover personal information Bongiorno collect that is exempt under the *Privacy Act*, such as Bongiorno's employee records.

Bongiorno may modify this Privacy Policy from time to time to reflect its current privacy practices.

In this Privacy Policy, 'Bongiorno', 'we', 'us' and 'our' mean the entities carrying on business under the names Bongiorno Financial Advisers Pty Ltd or Bongiorno Private Clients Finance Pty Ltd and includes any corporate entity owned or controlled by these companies.

## 2. Personal information we collect

The main types of personal information we collect include:

- o names, contact and address details and job titles;
- o information contained in identification documents (for example, passport, driver's licence);
- o tax file numbers;
- o date of birth and gender;
- o bank account details, shareholdings, details of investments;
- o superannuation details;
- o details of insurance arrangements;
- o educational qualifications, employment history and salary;
- o visa or work permit status;
- o personal information about your spouse and dependants



It may be necessary in some circumstances for Bongiorno to collect sensitive information about you; for example, your professional memberships, ethnic origin, criminal record or health information. We will only collect sensitive information as permitted under the *Privacy Act*.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with Bongiorno as usually we need to use your personal information to provide specific services to you, or which relate to or involve you.

### **3. How we collect and manage personal information**

#### **3.1. How we collect personal information**

Generally we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, or when you subscribe to our publications). Sometimes it may be necessary for us to collect your personal information from a third party.

For example, we may collect your personal information from your personal representative or a publicly available record, amongst other sources. We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process on our websites.

#### **3.2. Where you provide us with personal information about someone else**

If you provide us with someone else's personal information, you should only do so if you have their authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy or any Privacy Collection Statement we give you.

#### **3.3. Holding personal information**

Bongiorno holds personal information in hard copy and electronic formats.

We take reasonable steps to protect any personal information that we hold from misuse and loss. We also take reasonable steps to protect it from unauthorised access, modification and disclosure.

The security measures we take include physical security measures (including security passes to enter our offices and storage of files in lockable cabinets), technology security measures (including restriction of access, firewalls, the use of encryption, passwords and digital certificates). We also have document retention policies and processes.

### **3.4. Purpose for collecting, holding, using and disclosing personal information**

Bongiorno collects, holds and uses personal information for a number of purposes including:

- o to provide professional services;
- o to provide technology services and solutions;
- o to respond to requests or queries;
- o to maintain contact with our clients and other contacts (including alumni)
- o to keep our clients and other contacts informed of our services, industry developments and to notify of seminars and other events
- o for administrative purposes
- o for recruitment purposes
- o for purposes related to the employment of our personnel, providing internal services to our partners and staff and for matters relating to our business
- o for the engagement of service providers, contractors or suppliers relating to the operation of our business, or
- o for other business related purposes.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing our clients with the services we were engaged to perform.

The types of third parties to whom we may disclose your personal information include:

- o experts or other third parties contracted as part of an engagement;
- o our service providers;
- o our professional advisers;
- o other Bongiorno firms;
- o if you are an employee, a contractor or supplier of services to a client, then we may disclose your personal information as part of providing services to that client
- o as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including Bongiorno's business) or to enter into an alliance, joint venture or referral arrangement; or
- o government or regulatory bodies or agencies, as part of an engagement or otherwise, (for example, the Australian Taxation Office).

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non personal, de-identified or aggregated information to them for research or promotional purposes.

### **3.5. Disclosure of personal information overseas and sharing personal information amongst and within the Bongiorno Group businesses**

We may transfer your personal information to other Bongiorno Group businesses or entities to fulfil the purpose of collection of the personal information, or a related or ancillary purpose or otherwise in accordance with the *Privacy Act*.

In some circumstances Bongiorno also uses third party service providers to carry out its functions and provide services. These service providers are typically located in India, Sri Lanka, the Philippines, Singapore, South Africa, the United States of America and the European Economic Area (EEA).

## **4. Direct marketing**

Bongiorno may also use your personal information for the purpose of marketing its services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- o for electronic or hard copy communications, you can email [unsubscribe@bongiorno.com.au](mailto:unsubscribe@bongiorno.com.au); or
- o through our contact details below

## **5. Privacy on our websites**

### **5.1. Cookies**

"Cookies" (i.e. small text files placed on your computer when you first visit the site) are used on some Bongiorno websites. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's technology help desk or your internet service provider.

Cookies are primarily used to enhance your online experience. If you visit our websites to read or download information, such as news stories or articles, much of the information we do collect is statistical only (e.g., the domain from which you access the internet, the date and time you accessed our site, and the internet address of the website from which you linked directly to our site) and not personally identifiable. We use this information about the number of visitors and their use of the sites in aggregate form to make our sites more useful and attractive to you.

### **5.2. Your choices**

You have several choices regarding your use of Bongiorno's websites. In general, you are not required to provide personal information when you visit our websites. However, if you apply to receive information about our services, events and industry updates or wish to apply for a job, we may require you to provide certain personal information.

### 5.3. Links to third party websites

Bongiorno websites may contain links to third parties' websites, including sites maintained by other Bongiorno Group firms. Those other websites are not subject to our privacy policies and procedures. You will need to review those websites directly to view a copy of their privacy policy.

Bongiorno does not endorse, approve or recommend the services or products provided on third party websites.

## 6. Children

We understand the importance of protecting children's privacy, especially in an online environment. In particular, our websites are not intentionally designed for or directed at children under the age of 13. It is our policy to never knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide professional services.

## 7. Gaining access to personal information we hold

You can gain access to your personal information from Bongiorno on request in writing, subject to some limited exceptions permitted or required by law. The factors that affect your right to access your personal information include whether:

- o it is a frivolous or vexatious request;
- o the information relates to a commercially sensitive decision making process;
- o access would be unlawful;
- o access would prejudice enforcement activities relating to criminal activities and other breaches of law; or
- o denying access is required or authorised by or under law.

If Bongiorno denies you access, we will let you know the reason why access is denied.

Bongiorno may charge reasonable costs of providing you with access to your personal information.

## 8. Keeping personal information current

If you believe that any personal information Bongiorno has collected about you is inaccurate, incomplete, not up-to-date, irrelevant or misleading, please contact the Privacy Officer at Bongiorno and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act*.

## 9. Notifiable Data Breaches

Changes to the Privacy Act that took effect from 22 February 2018, require us to notify you if your personal information is involved in a data breach that is likely to result in serious harm to you. This is referred to as an “eligible data breach”.

This notification must include recommendations about the steps you should take in response to the breach. We must also notify the Australian Information Commissioner of eligible data breaches. In the event of a suspected data breach, we will conduct an assessment to determine whether the breach is likely to result in serious harm and as a result, require notification.

## 10. Complaints

If you wish to make a complaint to Bongiorno about our handling of your personal information, you can set out the details of your complaint in writing to the Privacy Officer at Bongiorno.

Bongiorno will endeavour to respond to you within 30 days of receiving your complaint and, where appropriate, will advise you of the general reasons for the outcome of the complaint. In some circumstances, the Privacy Officer may decline to investigate the complaint, for example if the complaint relates to an act or practice that is not an interference of the privacy of the person making the complaint. If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

## 11. How to contact us

If you:

- o would like to access or correct your personal information;
- o have a query in relation to this Privacy Policy;
- o would like to make a complaint about Bongiorno's handling of your personal information; or
- o would like to notify Bongiorno that you no longer wish to receive marketing material from us

please contact Bongiorno as follows:

### **Privacy Officer**

Bongiorno Group  
Level 2, 431 St Kilda Road  
Melbourne VIC 3004

Phone: +61 3 9863 3111

Fax: +61 3 9820 2518

Email: [privacy@bongiorno.com.au](mailto:privacy@bongiorno.com.au)