

Privacy Policy

KPS Wealth Pty Ltd

Version 5 – July 2026

Company:	KPS Wealth Pty Ltd
ACN:	646 321 799
AFSL:	528 241
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OVERVIEW

The KPS collects sensitive information. The Privacy Act defines 'sensitive information' as:

- a. information or an opinion about an individual's:
 - 1. racial or ethnic origin; or
 - 2. membership of a professional or trade association; or
 - 3. sexual orientation or practices; or
 - 4. criminal record;

that is also personal information; or

- a. health information about an individual; or
- b. genetic information about an individual that is not otherwise health information'

Sometimes the KPS may need to collect sensitive information about you to, for example, handle a complaint.

PRIVACY POLICY

KPS Wealth Pty Ltd ("KPS Wealth", "we", "our" or "us") is committed to protecting the privacy and security of personal information.

This Privacy Policy explains how we collect, hold, use, disclose and protect personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs).

By engaging our services, visiting our website or otherwise providing personal information to us, you consent to the collection, use and disclosure of your information as described in this Privacy Policy.

What Personal Information We Collect

The personal information we collect depends on the services we provide to you and may include:

- Name
- Date of birth
- Residential and postal address
- Telephone numbers
- Email addresses
- Employment details
- Financial information
- Tax File Number (where authorised by law)
- Superannuation details
- Insurance information
- Investment and banking information
- Identification documents
- Beneficiary and dependant information
- Information required to comply with anti-money laundering and counter-terrorism financing obligations

We may also collect information regarding your goals, objectives, financial circumstances and needs to enable us to provide financial advice and related services.

Sensitive Information

Sensitive information is a special category of personal information and may include:

- Health and medical information
- Disability information
- Biometric information
- Membership of professional associations
- Criminal history information (where relevant and lawful)
- Other sensitive information permitted by law

We will only collect sensitive information where:

- You have consented;

- It is reasonably necessary to provide our services;
- It is required by law; or
- Another exception under the Privacy Act applies.

How We Collect Personal Information

We generally collect information directly from you through:

- Meetings and interviews
- Telephone conversations
- Email correspondence
- Fact find documents
- Application forms
- Client portals
- Electronic signatures
- Website enquiries
- Surveys and questionnaires
- Video conferencing platforms

We may also collect information from third parties including:

- Accountants
- Solicitors
- Superannuation funds
- Insurance providers
- Product providers
- Credit reporting agencies
- Government agencies
- Referrers
- Other professional advisers authorised by you

Collecting Your Personal Information

Your personal information will be collected and held by us, as an Australian Financial Services Licensee (Licensee), for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer;
- protect our business and other clients from fraudulent or unlawful activity;
- to comply with relevant laws, regulations, and other legal obligations;
- to help us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested;

- and for any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers. Contact us on [07 4771 4089](tel:0747714089) or by responding to an email from us with the subject 'Opt-out'. We will process your request as soon as practicable.

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant, or others whom we believe you have authorized to provide information to us.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

How Your Personal Information is Held

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

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

Security measures may include:

- Access controls
- Password protection
- Multi-factor authentication
- Encryption
- Secure networks
- Staff confidentiality obligations
- Secure destruction procedures
- Monitoring and cybersecurity controls

While we take reasonable steps to protect information, no data transmission or storage system can be guaranteed as completely secure.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. The types of service providers and other third parties that may be provided with your personal information are:

- our Licensee, who provide us with our financial planning software and compliance support services;

- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- a superannuation trustee or other product provider who you have authorised to deduct advice-related costs from your superannuation or investment fund who has requested to review a copy of your Statement of Advice to satisfy their legal obligations;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law;
- and organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure;
- or in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Overseas Disclosure

Some service providers engaged by KPS Wealth may store, process or access information outside Australia.

Where personal information is disclosed overseas, we will take reasonable steps to ensure recipients protect the information in a manner consistent with Australian privacy laws.

Further information regarding overseas disclosures may be obtained by contacting us.

Automated Processing and Artificial Intelligence

KPS Wealth may utilise technology tools, software platforms and artificial intelligence systems to assist with administrative, research, compliance, workflow and client service functions.

Where technology is used, decisions affecting clients remain subject to appropriate human oversight.

If KPS Wealth implements automated decision-making processes that significantly affect individuals, additional disclosures will be provided as required by applicable privacy laws.

Anonymity and Pseudonymity

Where lawful and practical, individuals may interact with us anonymously or using a pseudonym.

However, because of the nature of financial services regulation and identification requirements, we will generally need to verify your identity before providing advice or implementing recommendations.

Accessing your Personal Information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access we will provide you with the reasons for this decision. To request access please contact us (see “Contacting Us and Privacy Issues” below).

Correcting Your Personal Information

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date.

If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see “Contacting Us and Privacy Issues” below) and let us know what information is incorrect.

If we agree that the personal information requires correcting we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not doing so.

Data Breaches

KPS Wealth maintains procedures for identifying, assessing and responding to suspected data breaches.

Where a data breach is likely to result in serious harm and the Notifiable Data Breaches Scheme applies, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required by law.

Individuals who believe their information may have been compromised should contact us immediately.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us on 03 9542 3200.

We are committed to working with you to resolve a complaint involving your personal information. However, if you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

External Dispute Resolution

If you are not satisfied with our response, you may contact:

Office of the Australian Information Commissioner

- www.oaic.gov.au/privacy
- Phone: [1300 363 992](tel:1300363992)
- Email: enquiries@oaic.gov.au

Or

Australian Financial Complaints Authority (AFCA)

- Website: www.afca.org.au
- Email: info@afca.org.au
- Telephone: [1800 931 678](tel:1800931678) (free call)
- In writing to: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Changes to This Policy

We may amend this Privacy Policy from time to time to reflect legal, regulatory, operational or technological changes.

The current version will be available on our website and upon request free of charge.

VERSION CONTROL

Version Number	Date Updated	Notes
1	21/01/2021	Original document prepared and finalised.
2	01/07/2022	Document Reviewed
3	July 2024	Document Reviewed
4	July 2025	Document Reviewed
5	July 2026	Document Updated – Overseas, AI, General