

Financial Services Guide Part1

1 February 2022

Version 1.4

This Financial Services Guide (FSG)

is an important document that outlines the type of products and services the licensed entity below is authorised to provide under the Australian Financial Services License (AFSL). This document is Part 1 of our Guide and should be read in conjunction with 'Part 2 – Authorised Representative Profile, which will be given to you with this Guide. The two parts make up the Guide. The financial services we refer to in this FSG are offered by:

GPS Wealth Ltd
ABN 17 005 482 726 | AFSL 254544 (GPS);
info@gpswealth.com.au

referred to within this FSG as 'we', 'us', or 'our'. Where these terms appear in this document you should associate them with GPS Wealth Ltd.

The FSG contains information about:

- who we are and how we can be contacted;
- the financial services that we provide;
- how we and other relevant parties are remunerated;
- when we provide those services;
- important matters relating to our relationships with third parties;
- how to get details on our privacy policy;
- how we resolve disputes, and what you should do if you have one.

Who are we?

GPS is a wholly owned subsidiary of ASX-listed entity Diverger Limited (ASX: DVR) (**Diverger**). GPS authorises the distribution of this FSG.

GPS, as the Licensee manages financial planners operating as authorised representatives of GPS, (collectively, '**Advisers**'). Under these arrangements GPS provides client engagement services, training, licensing, compliance, investment advice, and support services to the Advisers. GPS does not provide legal advice and we do not make any representations about the current or future value of any investments that you acquire, vary, or dispose of through us. You should always make your own enquiries. Before seeking our financial product advice you may have a number of questions you would like to ask us. We provide you with this FSG prior to the provision of any financial product advice and we recommend that you read it as it contains answers to some of the questions you might have.

Why we are not Independent

GPS is part of the Diverger Limited (**Diverger**) group of companies. Diverger offers a series of managed accounts called CARE managed portfolios for which it receives fees, and also offers our clients a choice of paying for Insurance advice via a fee or commissions or a combination. Additionally, HUB24 Limited (an ASX listed provider of investment administration platform and technology services) is a material shareholder of Diverger. These relationships restrict GPS from being referred to as independent, impartial or unbiased.

Who is responsible for the financial services described in this FSG?

GPS is responsible for the financial services provided to you. We have authorised the Corporate Authorised Representative and the Authorised Representatives identified in Part 2 of this FSG to provide financial services to you. Information about your adviser is detailed in Part 2 (Authorised Representative Profile) of this Guide.

How to instruct us

We expect that you will provide us with instructions in person, but you can also give us instructions via email. In some cases, we may require you to sign original documents (such as product application forms) or meet identification requirements.

We can be contacted at **GPO Box 4463, Sydney, 2001; Level 7, 115 Pitt St, Sydney 2000; by phone on 02 8074 8599**; or via email at **info@gpswealth.com.au**

If we give you personal financial advice we will provide you with a Statement of Advice. To make sure that advice is appropriate to you we must make reasonable enquiries about your current financial situation and future needs. In the Statement of Advice we will tell you about:

- the scope of the advice;
- your current personal and financial position;
- our understanding of your goals and objectives;
- the Advice, strategies and the financial products and services we recommend and the reasons why, any risks and how it addresses your goals and objectives;
- any fees and charges payable and any other benefits we may receive;
- any associations or conflicts we have with Financial Product Issuers or other parties which may have influenced the advice we give you.

If we provide further personal advice to you after we have issued a Statement of Advice and your circumstances have not significantly changed, we may provide the advice to you orally. We will also tell you about any fees or commissions and any associations with Financial Product Issuers or others who may have influenced that advice. We will record these details in a Record of Advice and keep this for seven years after providing the advice to you and you can request a copy of that Record from your adviser.

If we recommend to you a particular Financial Product we will give you information about the particular Financial Product – a Product Disclosure Statement – to help you make an informed decision about the Financial Product.

Complaints

We are committed to providing quality advice to our clients. This commitment extends to providing accessible complaint resolution mechanisms. If you have a complaint about any of our advice you should take the following steps.

Contact your Licensee Representative:

In the first instance please contact the Licensee representative who provided you with the particular service and tell them about your complaint. They will then try to resolve your complaint quickly and fairly.

Internal Dispute Resolution:

If you have raised your concern with your Licensee representative and the matter has not been resolved to your satisfaction, our Dispute Resolution Department can assist. There are three ways you can lodge your complaint:

By telephone:	Call 02 8074 8599, between 8.30am - 5.00pm Monday to Friday (AEST).
In writing (by mail):	Mail your written complaint to: Complaints Manager Diverger GPO Box 4463, Sydney NSW 2001
By email:	complaints@diverger.com.au

Once you have contacted Diverger, we will begin the process of investigating and resolving your complaint. We will endeavour to resolve your complaint quickly and fairly, generally within 5 business days. However, some complaints do take more time than others. We expect to resolve all complaints within 30 days. If do not resolve your complaint within 30 days we will advise you of the reasons for the delay, your right to contact AFCA if you are dissatisfied, as well as AFCA's contact details.

Complaints (continue)

External Dispute Resolution

If you do not feel your complaint has been resolved in a satisfactory manner, or if you have not received a response after 30 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free for you to use.

AFCA can be contacted as follows:

By telephone:	1800 931 678 (free call)
In writing (by mail):	Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
By email:	info@afca.org.au
Website	www.afca.org.au

The Australian Securities and Investments Commission (ASIC) also has a free call Info line on 1300 300 630 which you may use to make a complaint or obtain information about your rights.

You may also contact ASIC by writing to:

In writing (by mail):	Australian Securities and Investment Commission GPO Box 9827, Sydney NSW 2001
Website:	www.asic.gov.au

What is our advice process?

Our advice to you is principally about developing appropriate strategies to achieve your financial goals, taking into account your current circumstances.

The two types of advice that can be provided by our Advisers are:

- **Personal Financial Advice**
under Personal Advice we provide you with advice which takes into account your personal objectives, goals, financial situation, and needs. Where we provide you with Personal Financial Advice we will provide you with an advice document.
- **General Financial Advice**
General advice does not take into account your personal objectives, goals, financial situation, or needs. Where we provide you with General Financial Advice we will not provide you with an advice document.

Our Advisers meet strict education and training requirements and are supported by a team of investment and product specialists.

What financial products and services are we authorised to provide advice on?

We act for you when giving advice and arranging financial products. GPS is authorised to provide financial product advice on, and deal in, the following classes of financial products:

- Basic deposit and payment products;
- Retirement savings accounts;
- Government debentures, stocks, or bonds;
- Securities, which includes shares and debentures;
- Life products, including investment life products;
- Standard margin lending facilities;
- Interests in managed investment schemes, including investor directed portfolio services ('IDPS' or 'Wrap'); and
- Superannuation and self-managed superannuation funds.

Our internal investment team, supplemented by external experts, provides financial product research, which is used to carefully select and maintain an extensive list of approved products ('**APL**') for our authorised representatives to use when providing personal advice. We will predominantly recommend products on our APL, but may, dependent on particular circumstances, include investigating and recommending products which are not on the APL.

Important Note

Individual GPS Advisers may only be authorised to provide advice in some of the above areas. Please refer to Part 2 (Authorised Representative Profile) or their individual authorisation certificate, which sets out the areas they are authorised to provide advice.

Other services

Some Advisers may provide services other than financial product advice services through separate business arrangements to their financial planning businesses. These other services are not provided under the GPS AFSL and GPS does not train, support, or supervise the provision of these other services and has no responsibility in relation to those services. Examples of the services for which the Licensees are not responsible include, but are not limited to:

- General insurance services (for example, car insurance);
- Real estate and direct property advice;
- Taxation services, such as completion of tax returns;
- Accounting and audit services;
- Legal services;
- Consulting services;
- Lending services; and
- Administration and compliance of self-managed superannuation funds.

How do you pay for our services?

We will discuss and agree our fee structure with you before we provide you with services. Fees received in relation to the provision of services can be through the following methods:

- Fee for service (meaning any of the following: a fee for providing a Statement of Advice, a management fee, an ongoing advice or services fee, or any fee that you will pay for the service);
- Receipt of commissions from insurance providers; or
- A combination of any of the above.

Fees may be charged on the basis of an agreed rate per hour, a composite fee for the agreed set of services, or on a percentage of assets advised upon.

Further information in relation to fees and charges charged by your Adviser are detailed in Part 2 (Authorised Representative Profile).

Details of fees, commissions, or other benefits that we are entitled to receive in relation to a specific financial product recommendation will be disclosed to you in dollar and percentage terms in an advice document. In circumstances where an amount or percentage is not known at the time of providing advice, an estimate will be provided. Your Adviser will be able to explain how fees have been calculated.

If you elect to receive ongoing advice services from your Adviser, fees are applied based on the desired frequency of contact with your Adviser and the complexity of your circumstances. These fees may be a fixed dollar amount or an asset-based fee or a combination of the two. Asset-based fees will generally not exceed 1.1% per annum (inclusive of GST) of the total value of your portfolio.

The fee rate ranges may vary depending on the complexity and nature of the work undertaken and type of advice provided. In some circumstances due to the complexity of the advice being sought, a fee may be charged that falls outside of this range.

Where we receive commission in respect of placement of insurance, we will receive an upfront commission of up to 66% (inclusive of GST) of the initial premium, and ongoing commission of up to 22% (inclusive of GST) of renewal premiums. Commissions, whether up-front or ongoing, are

paid to us by the Insurer. For example, for an insurance product with an annual premium of \$2,000, where the issuer pays your adviser an upfront commission of 66%, GPS will receive \$1,320. The issuer will pay GPS 22% of the annual premium as ongoing commission for as long as you hold the product. Assuming an annual premium of \$2,000, this equates to \$440 per year. Amounts noted here are inclusive of GST.

All fees and commissions relating to financial advice provided to you are payable to your Licensee, who may pass up to 100% of those fees onto your Adviser. Please refer to Part 2 for that proportion.

Other fees and charges may be payable by you to the product provider depending on the recommendations in the Statement of Advice (SOA). These fees might include administration fees, investment fees, establishment fees, and other charges levied by the product provider. These fees and charges will be disclosed in their Product Disclosure Statements (PDS) or other documents provided to you.

What other remuneration may be paid to GPS

We and our Advisers may receive some or all of the following types of remuneration, in addition to the remuneration disclosed above, in recommending strategies which will be outlined in your SOA:

Referral arrangements

Under the Financial Planners and Advisers Code of Ethics your Adviser is not permitted to directly receive any referral fees for acting on your behalf. Referral fees may, however, be paid to your Adviser's employer, or your Licensee.

We will also not refer to a third party, or provide advice, in circumstances where there is a conflict of interest, unless it can be shown that this course of action is demonstrably in your best interest, and with your prior informed consent. If there is a conflict of interest such that it is not demonstrably in your best interest, then we will decline to provide that advice. We require all of our Advisers to conduct due diligence on referral partners to ensure that referral partners are only recommended where they meet this requirement.

Other relationships which might influence GPS in providing financial advice services

Hub24 Limited

Diverger Limited (Diverger), an ASX listed company, is the owner of GPS Wealth. HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Diverger.

The Hub24 platform is available to our GPS Wealth advisers through an approved product list. Our advisers are obliged to always act in a client's best interests and will only recommend the use of the Hub24 platform if it is appropriate to do. We also continue to use other platforms to implement our investment advice and you are free to request your adviser use an alternative platform if you would prefer. Importantly, no GPS Wealth adviser or practice is under any incentive, sales target, or obligation to recommend the Hub24 platform.

CARE Managed Accounts

DWA Managed Accounts Pty Ltd (AFSL 264125), a wholly owned subsidiary of Diverger, will receive fees for the provision of investment advice in their role as investment adviser to the CARE investment process (please contact your Adviser for more details of our CARE investment process). Any such fees will be outlined in the SOA, should it be applicable, and relate to the work done by DWA Managed Accounts Pty Ltd's Investment Committee in maintaining the CARE portfolios.

The CARE Portfolio Management fee is 0.297% (inclusive of GST) of funds invested as part of CARE. For example, if your account balance in the CARE Managed Account facility was \$100,000, the fee would be \$297 (inclusive of GST) for that year.

No part of this fee is paid to GPS or the Adviser.

Alternative remuneration

In accordance with industry requirements and the law, the Licensee and your Adviser each maintain an Alternative Remuneration register that contains information about any alternative forms of payments or benefits over \$100 that may be received (e.g. tickets to events and conferences). Benefits that are identical and similar and given on a frequent basis are prohibited if they total more than \$300 in any one year. If you wish to inspect the Alternative Remuneration register or ask any questions about this, please ask your Adviser.

Your Adviser may not receive one-off benefits in excess of \$300 per annum from any individual service provider, or benefits that exceed \$300 per annum for a series of benefits from the same provider.

Professional development education support

The Licensee may receive funds for education support from various product providers. Funds associated with this support must be used in the education and training of advisers.

Professional indemnity

GPS holds a professional indemnity ('PI') insurance policy, which complies with the requirements for compensation arrangements under the Corporations Act (subject to its terms and conditions), covering claims relating to the professional services provided by the Licensee and the Advisers.

The PI insurance policy covers advice in relation to professional services provided by Advisers while authorised by the Licensee, even where that representative has subsequently ceased to be an authorised representative of the Licensee.

Privacy

Your privacy is important to us. In general, we collect and verify information about you (and where applicable, persons acting on your behalf) to manage our relationship with you, to ensure that we provide the products and services most appropriate to your needs, and to make certain that we comply with our legal obligations.

The information required to be collected and verified by us depends on who you are and the nature of the service to be provided by us. If you fail to provide us with the required information, or if you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services you are seeking within the time periods contemplated.

Information acquired by us in the course of providing our services may be provided to external service providers (in Australia or Overseas), product and platform providers, auditors, taxation and legal advisers, and information technology consultants. If you do not agree to the transfer of your personal information outside Australia, please contact us. We may also use your information to comply with legislative or regulatory requirements in any jurisdiction.

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can always access the personal information held about you by contacting us.

A copy of our privacy policy is on our website. Otherwise, if you contact us, we can send you a copy.



GPS Wealth Ltd | AFSL 254 544 | ABN 17 005 482 726

Level 7, 115 Pitt Street, Sydney NSW 2000
E. info@gpswealth.com.au T. 02 8074 8599

www.gpswealth.com.au

Privacy Collection Statement

This Privacy Collection Statement is for clients of:

GPS Wealth Ltd | ABN 17 005 482 726; AFSL 254544 (GPS);

- Email: info@gpswealth.com.au;
- Website: www.gpswealth.com.au

We collect and verify personal information about you (and where applicable, persons acting on your behalf) to manage our relationship with you, to ensure that we provide the products and services most appropriate to your needs and to make certain that we comply with our legal obligations under the Privacy Act 1988 (Cth) and under the Corporations Act 2001 (Cth). This Privacy Collection Notice forms part of our Privacy Policy, and together they form our notice for collecting personal information under Australian Privacy Principle 5.

The information required to be collected and verified by us depends on who you are and the nature of the service to be provided by us. If you fail to provide us with the required information, or if you provide us with incomplete, or inaccurate information we may not be able to provide you with the products or services you are seeking within the time periods contemplated. For a complete list of the information we may collect and verify please see our Privacy Policy.

If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. Alternatively, we may elect to terminate our relationship with you if we believe we are unable to provide you with adequate service.

Personal information acquired by us in the course of providing our services may be provided to external service providers, product and platform providers, auditors, taxation and legal advisers and information technology consultants. Otherwise your personal information will not be disclosed unless:

- Australian law requires us to; or
- you authorise us to disclose it to a 3rd Party on your behalf, e.g. your tax adviser.

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might be stored or accessed in overseas countries, including but not limited to New Zealand, Sri Lanka, Singapore, United Kingdom, Philippines, India and the United States of America. Details of the countries we disclose to you may change from time to time. You can contact us for further details regarding where we may send your personal information.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, we will take reasonable steps to ensure that overseas providers do not breach the Privacy Act and that any third parties are subject to a similar level of protection or similar obligations that are offered by the Privacy Act. If you do not agree to the transfer of your personal information outside Australia, please contact us.

Some of our financial advisers may enter their own outsourcing arrangements to countries other than those detailed above. Those arrangements will be disclosed separately by the financial adviser to their clients.

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can always access the personal information held about you by contacting us.

A copy of our Privacy Policy is on our websites. Otherwise if you contact us, we can send you a copy.



This FSG Part 2 contains information specific to your adviser and should be read together with the [FSG Part 1](#). GPS Wealth Ltd has authorised your adviser to distribute this FSG.

Who is providing the financial services?

Your Financial Adviser is Andrew McLauchlan (Andrew).

I am an Authorised Representative of GPS Wealth Ltd AFSL: 254 544 and am authorised by GPS Wealth Ltd to provide the financial services described in this FSG.

My Authorised Representative number is 243466.

What experience does your financial planner have?

I have been an adviser since 2003. Prior to becoming an adviser I worked at Macquarie Bank where I started my Chartered Accountant studies (which I completed in 2005). I provide comprehensive financial advice to all of my clients, and I am passionate about assisting my clients achieve their financial goals.

In addition to my Chartered Accounting designation, I also hold an Advanced Diploma in Financial planning as well as a Bachelor in Commerce (Accounting and Finance), from Bond University

Does your adviser have any associations and conflicts of interest?

I am a sub-authorised representative of Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth ABN 83 010 055 802, an authorised representative (no. 242972) of GPS Wealth Ltd ABN 17 005 482 726

Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth may have referral arrangements with other professional service providers. If a client is referred to us, we may pay the referrer a fee or other benefit. We will record the details of any referral fees in the Statement of Advice we prepare for you. If we refer a client to another service provider they may pay us a referrer fee. We will only refer you to third party professionals, where we believe it is in your best interest to do so.

All fees and commissions are paid to Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth.

I am an Employee of which provides services and may therefore benefit from you using their services. We will only recommend you use these services where we believe it is in your best interest to do so, and with your agreement.

Please refer to FSG Part 1, for further information on other relationships that might influence Diverger in providing financial advice services, we will also disclose any associations or conflicts within the Statement of Advice, that we prepare for you.

What qualifications has your adviser completed?

Qualification Name
Diploma of Financial Services
Advanced Diploma of Financial Services
Bachelor of Commerce
Chartered Accountant

Authorised Products and Services

I am authorised in the following products and services:

Deposit and Payment Products – Basic Deposit Products

Government Debentures, Stocks or Bonds

Investment Life Insurance and Life Risk Insurance Products

Managed Investment Schemes including IDPS

Retirement Savings Accounts

Standard Margin Lending Facilities

Superannuation

Self-Managed Superannuation Funds

Schedule of Fees

These fees should be used as a guide only. We will discuss your individual needs and agree our fees with you before we provide advice. The actual agreed fees will depend on the complexity of your circumstances, goals and needs and the scope of advice we provide. Our fees are set out below:

- Plan preparation and implementation fees. These are the fees you pay when you have agreed to receive our advice and will be between \$2,200.00 and \$11,000.00, inclusive of GST, depending on complexity and scope of advice.
- Annual Ongoing service fees. These are the fees you pay when you agree to receive our ongoing advice, and will be between \$2,500.00 pa and \$82,500.00 pa, inclusive of GST. Our ongoing services will be agreed with you in an ongoing services agreement.

How will your financial adviser be paid for the services provided?

All fees and commissions disclosed in the FSG which are attributed to the services provided to you by your adviser are paid to GPS Wealth Ltd.

I am an Employee of Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth and am remunerated through the payment of salary and bonus.

GPS Wealth Ltd will pay up to 100% of those fees and commissions to Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth. Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth may pass on up to 100% of those fees and commission to Andrew McLauchlan.

How can you contact your financial adviser?

Andrew McLauchlan

Phone: 0755399095

Alex McLauchlan Associates Pty Ltd TA McLauchlan Wealth

Mobile: 0410550740

Website: <http://www.mwealth.com.au/>

Email: andrew@mwealth.com.au

Office Address: 80-82 Upton St BUNDALL QLD 4217

Postal Address: PO Box 5822 Gold Coast MC QLD 9726

FSG Approved Date: 1/02/2022 7:00 PM



Privacy Policy



Background

This Privacy Policy is an important document and outlines our policy on handling the personal information that we collect about individuals including customers and potential customers.

This Privacy Policy is for customers of the following entities:

- **Merit Wealth Pty Ltd**
ABN 89 125 557 002; AFSL 409361 (**Merit**); contactus@meritwealth.com.au;
- **The SMSF Expert Pty Ltd**
ABN 17 155 686 356 ;AFSL 445113 (**SMSF Expert**); Email: info@thesmsfexpert.com.au;
- **GPS Wealth Ltd**
ABN 17 005 482 726 AFSL; 254544 (**GPS**); Email: info@gpswealth.com.au,

collectively referred to within this policy as ‘the Licensees’, ‘we’ or ‘us’ or ‘our’. Where these terms appear in this document you should associate it with the entity named above who provided this policy to you.

We are committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (‘Privacy Act’). This Privacy Policy describes our policies and practices in relation to how we can collect, use, store and disclose your personal information.

Collection and storage of personal information

By ‘personal information’, we mean any details about you, from which your identity is apparent or can be uncovered. At times it may be necessary for us to collect and hold personal or sensitive Information from you. The purpose of collecting personal information is to facilitate financial planning, provision of financial products or services, insurance policies or related services, and to update our records.

In collecting this information, we will take reasonable steps to inform individuals as to:

- Why we are collecting that personal information;
- Who else we might disclose that personal information to;
- What may happen if individuals do not provide personal information to us;
- How to gain access to that information

Generally, we will not collect sensitive information about you unless we required to do so by law or unless you provide consent. ‘sensitive information’ includes information about your race or ethnicity, political opinions, criminal record, sexual information or biometric information. However, we may collect sensitive information from you in relation to religious beliefs or affiliations and other health, medical or genetic information if it will have an impact on the services we provide to you.

We will only use sensitive information for the purposes for which it was provided, unless you agree otherwise or the use or disclosure of this information is permitted by law.

Documents asking for sensitive information will explain this and we will only collect sensitive information from you where reasonably necessary for us to provide a service to you and with your consent, or in limited other circumstances specified under the Privacy Act or under the *Corporations Act 2001* (Cth) (‘Corporations Act’).

How do we collect your personal information?

Generally, we collect your personal information directly from you. We could do this in a number of ways, including through face to face interviews, email correspondence and other online mediums.

We may also collect personal information about you from third parties such as:

- Referral partners; and
- Other organisations, service providers or business partners who provide you with products or services along with us.

Why we collect personal information

Pursuant to the Corporations Act we are required to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information you may be exposed to higher risks in respect of the recommendations made to you and this may affect the adequacy or appropriateness of advice given to you. Alternatively, we may elect to terminate our relationship with you if we believe we are unable to provide you with adequate service.

Other purposes for which we are required to collect your personal information include:

- Verifying your identity for anti-money laundering and counter-terrorism financing purposes;
- Managing your ongoing requirements, our ongoing relationship with you and to improve our services;
- Internal functions such as administration, accounting and information technology system requirements;
- Complying with legal and regulatory requirements,
- In order to prevent fraud or crime;
- Sending you offers, updates, articles, newsletters or other information about products and services that we believe will be of interest to you. You may opt out of this at any time by getting in contact with us;
- Enhancing customer service and product options;
- Handling complaints; and
- Giving you educational information, newsletters or opportunities that we believe may be relevant to your financial needs and circumstances.

Types of personal information we collect and store

- Name, address, date of birth and phone number;
- Details of your financial needs and objectives;
- Details of your investment preferences and risk tolerance;

- Details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, etc;
- Information about your employment history, employment circumstances, family structure, commitments and social security eligibility;
- Any other relevant information including medical history and/or reports required for the purposes of risk insurance.

Disclosure of personal information

We will not use or disclose personal information collected by us for any purpose other than to perform the professional services you have contracted us to do. We will not use it for anything other than:

- The purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure; or
- Where you have consented to such disclosure; or
- Where we are required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Other areas within our group who provide financial and related services;
- Financial planners, credit providers and brokers and those who are authorised by us;
- Service providers and specialist advisers to us who have been contracted to provide us with administrative, financial, insurance, accounting, legal, information technology, research or other services;
- Other insurers, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
- Credit reporting or reference agencies or insurance investigators;
- AUSTRAC, the government agency who oversees Anti Money Laundering and Counter Terrorism Financing;
- External dispute resolution bodies to handle your complaint; and
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event.

Additionally:

- We may be required to make certain information available for inspection by Professional Associations which we or our Authorised Representatives are members of, as part of ongoing compliance with standards. This may involve the disclosure of your personal information.

- We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.
- We may disclose your personal information to superannuation fund trustees, insurance providers, credit providers and product issuers for the purpose of giving effect to your financial plan and the recommendations made by us.
- In order to ensure that you receive a personal and tailored service, your personal information may be transferred to one of our agents or representatives who will be your primary point of contact.

It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

Generally, we require that organisations outside our group who handle or obtain personal information as service providers acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the privacy law.

Do we send personal information to overseas recipients?

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information might be stored or accessed in overseas countries, including but not limited to New Zealand, Sri Lanka, Singapore, United Kingdom, Philippines, India and the United States of America. Details of the countries we disclose to you may change from time to time. You can contact us for further details regarding where we may send your personal information.

Personal information may also be processed by staff or by other third parties operating outside Australia who work for us or for one of our suppliers, agents, partners or related companies.

When we send information overseas, we will take reasonable steps to ensure that overseas providers do not breach the Privacy Act and that any third parties are subject to a similar level of protection or similar obligations that are offered by the Privacy Act. If you do not agree to the transfer of your personal information outside Australia, please contact us.

Some of our financial advisers may enter their own outsourcing arrangements to countries other than those detailed above. Those arrangements will be disclosed separately by the financial adviser to their clients.

Storing and protecting your information

We strive to maintain the relevance, reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security.

We generally keep personal information for up to 7 years from the date our financial advice was provided to you or for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements. We will destroy or de-identify your personal information when it is no longer required.

We hold the information we collect from you in physical and electronic records, which may be stored at our premises or in secure data centres or in the cloud.

We take reasonable steps to protect the information we retain from misuse, loss and from unauthorised access, modification or disclosure.

We also instruct our staff and Authorised Representatives to respect confidentiality, adhere to policies and obey the law. Transgressions are reported and dealt with as required by the law.

Access and correction

You may have the right to access and request corrections of the Personal Information held by us. This right of access is subject to some exceptions permitted by law.

We will not provide you access to personal information which would reveal any confidential information or the detail of any in-house evaluative decision making process, but may instead provide you with the result of the decision making process or an explanation of that result.

We reserve the right to charge a reasonable fee for searching for and providing access to your personal information. In the event we refuse you access to your personal information, we will provide you with an explanation for the refusal.

We will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependant to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

Collecting through our website

Data - We collect information about the use of our website, for example when you browse our website our service provider logs your IP address, the date and time of your visit, the pages and links accessed, time spent on pages, videos watched and emails opened. We use this information for statistical purposes and to improve the content and functionality of our website, to better understand our website users and markets and to improve our services.

Cookies – In order to collect this data we use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to not accept cookies or notify you when you receive a cookie so that you can decide if you want to accept it. They allow the website to recognise your computer when you return in the future.

Analytics - Google analytics marketing features are active on this website. Cookies are used for marketing analysis purposes, so that Google can provide more relevant advertising through its channels. We will not identify users or facilitate the merging of personally identifiable information with non-personally identifiable information collected through any Google advertising product or feature. You can opt-out of the Google Analytics Advertising Features we use, through Ads Settings, Ad Settings for mobile apps, or any other available means, including the "Google Analytics opt-out browser ad-on" which can be found here: <https://tools.google.com/dlpage/gaoptout/>.

How can you contact us about privacy?

You can contact us at GPO Box 4463, Sydney, 2001; level 15, 155 Pitt St, Sydney 2000, or by phone on 02 80748599, or via email as noted below.

Merit: contactus@meritwealth.com.au

GPS: info@gpswealth.com.au

SMSF Expert: info@thesmsfexpert.com.au

Correspondence should be addressed for the attention of the Privacy Officer. Please ensure that you provide sufficient information for us to be able to contact you if we require clarification of the matters that you raise.

If you wish to contact us to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, in most cases we will contact you within five working days of receipt of your complaint to let you know what action we are taking regarding your complaint.

Alternatively, you can contact the Office of the Australian Information Commissioner, on 1300 363 992 or online at oaic.gov.au.

If your complaint reasonably requires us to contact some other person, we may decide to give to that other person some of the information contained in your complaint. We do this as infrequently as possible, but it is a matter for our sole discretion as to whether we do give information, and if we do, what that information is.

About this policy

This policy is effective as of 22nd July 2020 We will update this policy as and when required and post the updated policy on our websites, which are:

www.gpswealth.com.au

www.meritwealth.com.au/

www.thesmsfexpert.com.au/



Level 15, 115 Pitt Street Sydney NSW 2000

02 8074 8599

info@eastonwealth.com.au



merit
wealth



GPS Wealth Ltd | AFSL 254 544 | ABN 17 005 482 726

Merit Wealth Pty Ltd | AFSL 409 361 | ABN 89 125 557 002

The SMSF Expert Pty Ltd | AFSL 445 113 | ABN 17 155 686 356



Corporate Authorised Representative Certificate

GPS Wealth Ltd, ABN 17 005 482 726 ("the Licensee"), the holder of Australian Financial Services Licence number 254544 under the Corporations Act 2001, certifies that:

**Alex McLauchlan Associates Pty Ltd TA
McLauchlan Wealth**

Corporate Authorised Representative No. 242972

Is a Corporate Authorised Representative of the Licensee pursuant to section 916A of the Corporations Act 2001.



GPS WEALTH

Sub-Authorised Representative Certificate

GPS Wealth Ltd, ABN 17 005 482 726 (“the Licensee”), the holder of Australian Financial Services Licence number 254544 under the Corporations Act 2001, certifies that:

Andrew McLauchlan

Sub-Authorised Representative No. 243466

Is a Sub-Authorised Representative of the Licensee pursuant to section 916A of the Corporations Act 2001 and authorised to provide financial advice in the following areas:

- Financial Planning
- Risk Management
- Managed Investments
- Superannuation and Retirement Planning
- Margin Lending
- Self-Managed Superannuation Funds

Date issued: 21st January 2015