



PRIVACY POLICY

Alethia Partners Pty Ltd (“Alethia”) regards Privacy as a pertinent issue and understands that it is important for you to know how we handle your personal information. This policy applies to Alethia Partners and its authorised representatives (“we”, “us”, “our”).

Privacy Laws apply to how we collect, hold, use and disclose your personal information. Alethia complies with its obligations under the Privacy Act 1988 and the associated Australian Privacy Principles (“APPs”) and is committed to protecting the privacy of your personal information.

You can obtain further details of our obligations as an organisation under Australia’s privacy laws from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner’s associated guidelines at www.oaic.gov.au.

The following Privacy Policy has been published to provide you with an outline of the following:

- What information we collect about you.
- How we collect personal information.
- What we do with your personal information.
- Who we disclose personal information to.
- How we protect your personal information.
- How to keep your personal information accurate and up to date.
- How you can access your personal information; and
- Who to contact if you have any questions about this Policy or wish to make a complaint.

Types of personal information that we collect, use and hold

We may collect and hold a range of personal information about you to provide you with our services, including:

- identification information including your full name, residential address, and date of birth.
- gender.
- marital status.
- occupation.
- driver’s licence and/or passport details.
- contact details (including telephone and email addresses);
- information about your financial position including details of assets, liabilities, income and expenses; and
- any other information we may need to provide you with our services.

We may collect sensitive information from you. Sensitive information (for example) may include information relating to a person’s health. We will only collect sensitive information that is reasonably necessary for us to provide you with our services.

Why we collect your personal information

We may use and disclose the information we collect about you for the following purposes:

- establishing your identity.

- checking whether you are eligible for our services.
- providing you with our services.
- managing and administering our services.
- responding or dealing with a complaint.
- providing information, we believe may be relevant or of interest to you;
- direct marketing.
- data analytics and statistical analysis.
- to notify you of other products, services, special offers or events.
- where you otherwise expressly consent to the use or disclosure.
- complying with legislative and regulatory requirements in any jurisdiction; and
- to assist Alethia in the running of its business.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Some laws require or authorise our collection of your personal information including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006(Cth).

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

We will retain the information we collect from you for a period of at least 7 years, as required by law.

How we collect your personal information

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our services. We may also collect your information from your representatives or professional advisers and electronically (e.g. online forms, email, website interactions).

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services, or meet your needs appropriately.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information that is not relevant, we will destroy or de-identify that personal information as soon as practicable.

Disclosure of your personal information

In order to provide you with services, we may need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- to any of Alethia's related companies.

- our agents, contractors and external service providers.
- to our professional advisers, auditors and insurers.
- your representatives.
- the Australian Financial Complaints Authority or Office of the Australian Information Commissioner.
- organisations involved in a transfer or sale of our assets or business.
- anyone to whom the disclosure is required or permitted under the Privacy Act, other Australian Law, Regulation or Court/Tribunal Order; and
- anyone else where you have provided your consent.

We do not currently disclose personal information overseas. If this changes, we will update this policy. We will not disclose personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act and the APPs; or
- the recipient is subject to an information privacy scheme similar to the Privacy Act.

Keeping your personal information accurate and up to date

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up to date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

How we hold your personal information

We recognise the importance of securing the personal information of our clients. Alethia will primarily hold information about you electronically on secure servers located in Australia. Where information is held electronically, Alethia utilises technological safeguards including passwords and multifactor authentication. We utilise globally recognised software providers, such as Microsoft, and other Australian based service providers that may operate data storage centres in various jurisdictions.

Direct marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information.
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing;
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing

communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time. You can opt out of marketing at any time by contacting us.

Use of our Website and Privacy

The below provides important information about how we use cookies and how we may collect information when you visit our website or the website of our representatives.

Links to Third-Party Websites

Our website may contain links to third-party websites that are not operated or controlled by Alethia or its representatives. These third-party sites have their own privacy policies and practices, and we encourage you to review them before providing any personal information.

We are not responsible for the content, privacy practices, or the accuracy of information on third-party websites linked to or from our site. These links are provided for your convenience, and their inclusion does not imply that we endorse or are affiliated with the third-party websites.

What Are Cookies?

Cookies are small text files that are placed on your device (such as your computer or mobile phone) when you visit our website. They help us improve your experience on the website by allowing us to remember your preferences, provide personalised content, and analyse the way visitors use the website.

We use the following types of cookies on our website:

- **Necessary Cookies:** These cookies are essential for the operation of the website and cannot be disabled in our systems. They are typically only set in response to actions you take, such as logging in or filling out forms.
- **Performance Cookies:** These cookies collect information about how you use our website, such as which pages you visit most often. They help us improve the functionality of the website by providing insights into user behaviour. These cookies are usually anonymised.
- **Functionality Cookies:** These cookies enable the website to remember choices you make, such as your preferred language or region, to provide a more personalised experience.

How We Use Cookies:

We use cookies to:

- Improve your user experience on our website.
- Provide analytics about how our website is used.
- Remember your preferences and settings.

Your Consent

By using our website, you consent to the use of cookies as outlined in this policy. If you do not agree with our use of cookies, you can manage your cookie preferences by adjusting your browser settings. You can choose to block or delete cookies; however, please note that this may affect the functionality of certain parts of the website.

Recording, Transcription and the Use of Artificial Intelligence (AI) technology

We utilise artificial intelligence (AI) technologies within our business, including Microsoft Copilot and Microsoft Teams, to enhance productivity, assist with record keeping and streamline workflows. Face to face meetings and calls with Alethia may also be recorded and transcribed by AI programs AI may assist in summarising meetings, generating insights, and automating routine tasks to support our record keeping obligations, workflow efficiencies and our internal training and quality assurance activities. All personal and sensitive information processed through meeting recordings; AI tools and the AI-driven processes we use comply with the Australian Privacy Principles (APPs) and our commitment to data security and the protection of your personal information. Should you wish to opt out of the use of AI-driven tools and meeting recordings in your interactions with Alethia, such as automated meeting summaries and transcriptions, please contact your adviser directly

AI tools do not make decisions about your financial advice or your personal circumstances. All advice is prepared and reviewed by qualified financial advisers.

Privacy and Data Security

We take your privacy seriously. The information collected through cookies is used in accordance with our Privacy Policy. We will not use cookies to collect personally identifiable information without your consent.

Gaining access to your personal information

You can gain access to your personal information (subject to some exceptions allowed by law) by contacting the Privacy Officer. We will need to verify your identity first. We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances, it may take longer (for example, if we need to contact other entities to properly investigate your request).

We may refuse to provide you with access in certain circumstances. If access is refused, we will give you a notice explaining the reasons for our decision and your options to make a complaint.

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Resolving your privacy concerns

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us on the details below. We are committed to resolving your complaint and doing the right thing by our clients. We will investigate your complaint and provide you with our response within 30 days. Please see our Complaints Policy available on our website at for full details of how we deal with complaints.

If you are not satisfied with the outcome of your complaint, you are entitled to lodge a complaint with the Australian Financial Complaints Authority (AFCA):

Online: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678

Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

You may also contact the Office of the Australian Information Commissioner by:

Online: www.oaic.gov.au

Email: enquiries@oaic.gov.au

Phone: 1300 363 992

Mail: Director of Complaints, Office of the Australian Information Commissioner
GPO Box 5218, Sydney
NSW 2001

Contact Us:

Alethia Partners Pty Ltd

Telephone: 08 9242 3053

Email: compliance@alethiapartners.com.au

Address: Unit 4, 16 Nicholson Road, Subiaco WA 6008

Post: Unit 4, 16 Nicholson Road, Subiaco WA 6008

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