

PRIVACY POLICY

Fenton Group Aust Pty Ltd ATF ADF Family Trust
T/AS Fenton Financial

ABN 34 216 720 700

Effective Date: 9 April 2025 | Review Date: April 2026

Fenton Group Australia Pty Ltd T/AS Fenton Financial and its advisers are Authorised Representatives of Walker Lane Pty Ltd ABN 70 626 199 826 AFSL 509305

1. Our Commitment to Your Privacy

Fenton Group Aust Pty Ltd ATF ADF Family Trust, trading as Fenton Financial (ABN 34 216 720 700) (we, us, our) is committed to protecting the privacy and security of your personal information. This Privacy Policy explains how we collect, use, hold, disclose, and protect your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

Our website is operated by us as an integral part of delivering financial planning and advisory services to our clients. This Privacy Policy applies to personal information collected through our website, by telephone, email, in person, and through any other means in connection with our business.

By using our website or engaging our services, you acknowledge that you have read and understood this Privacy Policy.

2. About Us and Our Authorised Representative Status

Fenton Financial provides financial planning and advisory services to individuals, families, and small business owners across Australia. Our principal business address and contact details are set out in Section 13 of this Privacy Policy.

Fenton Group Australia Pty Ltd T/AS Fenton Financial and its advisers are Authorised Representatives of Walker Lane Pty Ltd, ABN 70 626 199 826, AFSL 509305 (Walker Lane). Walker Lane holds an Australian Financial Services Licence issued by the Australian Securities and Investments Commission (ASIC).

As Authorised Representatives, we are required to act in accordance with Walker Lane's obligations under its AFSL and applicable financial services laws, which include obligations relating to the collection and handling of your personal information.

3. What Is Personal Information?

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not the information or opinion is true, and whether or not it is recorded in a material form.

Sensitive information is a subset of personal information that is afforded higher protection under the Privacy Act. We may collect sensitive information in limited circumstances, as described in Section 4 below.

4. What Personal Information We Collect

4.1 Information You Provide Directly

When you interact with our website, complete a contact form, engage our services, or communicate with us, we may collect:

- Full name, date of birth, and residential or business address
- Contact details including email address, telephone number, and postal address
- Financial information including income, assets, liabilities, superannuation balances, investment details, insurance arrangements, and tax file number (TFN) where required by law
- Employment status, occupation, and employer details
- Family composition and personal circumstances relevant to financial advice
- Goals, objectives, and risk tolerance for the purposes of providing personal advice
- Identification documents such as driver's licence or passport details for AML/CTF verification
- Health information, including life expectancy considerations and insurance-related medical history, where relevant to personal advice

4.2 Information Collected Automatically via Our Website

When you visit our website, we may automatically collect certain technical information, including:

- IP address and approximate geographic location
- Browser type and version, operating system
- Pages visited, time and duration of visits, referring URLs
- Device identifiers and cookies (see Section 10)

This information is generally collected in de-identified or aggregated form for analytics purposes. To the extent it constitutes personal information, it is handled in accordance with this Privacy Policy.

4.3 Sensitive Information

We will only collect sensitive information (such as health information) where it is directly relevant to the financial services we provide to you, and with your consent, or where otherwise permitted by law. We will not collect sensitive information for purposes that are unrelated to our financial services.

4.4 Information About Third Parties

You may provide us with personal information about third parties (for example, a spouse, dependant, or business partner) in the course of obtaining financial advice. Where you do so, you confirm that the individual concerned is aware of this Privacy Policy and has consented to their information being provided to us.

5. How We Collect Personal Information

We collect personal information:

- Directly from you, through our website contact forms, enquiry submissions, or email
- During face-to-face or telephone appointments, or via video conference
- From completed fact-finders, questionnaires, and client onboarding documents
- From third parties where you have authorised us to do so, such as your accountant, superannuation fund, or insurer
- From publicly available sources, including ASIC's registers and government databases, where permitted by law
- From Walker Lane as our AFSL holder, where relevant to the services we provide

Where it is reasonably practicable to do so, we will collect personal information directly from you. If we collect personal information about you from a third party, we will take reasonable steps to notify you of this unless doing so would be impracticable or unlawful.

6. Why We Collect and How We Use Your Personal Information

6.1 Primary Purposes

We collect and use your personal information primarily to:

- Assess your financial situation and provide personal financial advice in accordance with our obligations under the Corporations Act 2001 (Cth)
- Prepare Statements of Advice (SOAs), Records of Advice (ROAs), and related financial services documentation
- Implement, review, and monitor your financial strategies
- Process transactions on your behalf with product providers, superannuation funds, and insurers
- Correspond with you in relation to your financial affairs
- Meet our obligations as Authorised Representatives of Walker Lane, including compliance, supervision, and auditing requirements
- Verify your identity and comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) (AML/CTF Act)
- Manage our ongoing client relationship with you

6.2 Secondary Purposes

Where you have consented, or where it is otherwise permitted by law, we may use your personal information for secondary purposes including:

- Sending you financial planning updates, market commentary, or educational content
- Notifying you of changes to legislation, regulations, or products that may affect your financial plan
- Conducting client satisfaction surveys
- Improving our services and website functionality

6.3 Tax File Numbers

We will only collect and use your Tax File Number (TFN) where required by law (for example, in connection with superannuation and investment transactions). We handle TFNs strictly in accordance with the Privacy (Tax File Number) Rule 2015.

7. Disclosure of Your Personal Information

7.1 Parties to Whom We May Disclose

We may disclose your personal information to the following categories of recipients:

- Walker Lane Pty Ltd (ABN 70 626 199 826, AFSL 509305), as our licensing dealer group, for compliance, supervision, audit, and regulatory reporting purposes
- Product providers, fund managers, superannuation trustees, and insurance companies where required to implement your financial plan
- Platform operators and investment administration services
- Your accountant, solicitor, mortgage broker, or other professional advisers where you have given us authority to do so
- Third-party service providers engaged by us to assist in delivering our services, such as document management, secure cloud storage, and client relationship management (CRM) software providers
- ASIC, AUSTRAC, the Australian Taxation Office (ATO), or other government regulators where required or authorised by law
- Courts, tribunals, or law enforcement agencies where required by law or court order

7.2 We Do Not Sell Your Information

We will not sell, rent, trade, or otherwise transfer your personal information to third parties for their own marketing purposes.

7.3 Overseas Disclosure

Some of our third-party service providers (including cloud infrastructure and software providers) may store or process data in countries outside Australia. Where personal information is disclosed to overseas recipients, we take reasonable steps to ensure the recipient does not breach the APPs in relation to that information, consistent with our obligations under APP 8.

Countries to which personal information may be transferred include, but may not be limited to, the United States and countries in the European Economic Area, where these service providers operate. We will only engage overseas service providers where we are satisfied that adequate data protection mechanisms are in place.

8. How We Protect Your Personal Information

We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification, and disclosure. Our measures include:

- Encryption of data in transit using industry-standard TLS/SSL protocols
- Password-protected and access-controlled systems with role-based access
- Secure document storage and client file management
- Regular software updates and security patching
- Staff training on privacy obligations and data handling
- Physical security measures for any paper-based records

We will retain your personal information for as long as necessary to fulfil the purposes set out in this Privacy Policy, and to comply with our legal and regulatory obligations. Financial advice records are generally retained for a minimum period as required under the Corporations Act 2001 (Cth) and applicable ASIC record-keeping requirements.

When personal information is no longer required, we will take reasonable steps to destroy or de-identify it securely.

9. Accessing and Correcting Your Personal Information

9.1 Your Right to Access

Under the Privacy Act, you have the right to request access to the personal information we hold about you. To make an access request, please contact us using the details in Section 13. We will respond to your request within a reasonable time (generally within 30 days) and may charge a reasonable fee to cover the cost of providing access, where permitted.

We may decline to provide access in certain circumstances, including where doing so would be unreasonable or unlawful, or where access would prejudice the privacy of another individual. If we decline your request, we will provide written reasons.

9.2 Your Right to Correct

If you believe that personal information we hold about you is inaccurate, out of date, incomplete, irrelevant, or misleading, you may request that we correct it. We will take reasonable steps to correct the information within 30 days of receiving your request, or notify you if we do not agree that a correction is required.

10. Website, Cookies, and Analytics

10.1 Cookies

Our website may use cookies and similar tracking technologies to improve your browsing experience and analyse website traffic. Cookies are small text files placed on your device by a web server. They do not identify you personally unless you have logged into an account.

Types of cookies we may use include:

- Essential cookies: required for the website to function correctly
- Analytics cookies: used to understand how visitors use our website (e.g., Google Analytics)
- Preference cookies: used to remember your settings and preferences

You can disable cookies in your browser settings; however, doing so may affect the functionality of our website. By continuing to use our website, you consent to our use of cookies as described in this Policy.

10.2 Third-Party Links

Our website may contain links to third-party websites, including product providers and regulatory bodies. We are not responsible for the privacy practices of those websites and encourage you to review their privacy policies before providing any personal information.

10.3 Online Enquiries and Contact Forms

Information submitted through our website contact or enquiry forms is transmitted securely and used only for the purpose of responding to your enquiry. We do not use this information for unsolicited direct marketing without your consent.

11. Direct Marketing

We may send you information about financial planning topics, regulatory updates, or services that may be of interest to you, where you have consented to receive such communications, or where we are otherwise permitted to do so under the Spam Act 2003 (Cth) and applicable laws.

You may opt out of receiving marketing communications at any time by:

- Clicking the unsubscribe link in any marketing email
- Contacting us directly using the details in Section 13

We will process your opt-out request promptly. Please note that even if you opt out of marketing communications, we will continue to send you transactional or service-related communications that are necessary for the management of your financial advice relationship.

12. Privacy Complaints and Dispute Resolution

12.1 Making a Complaint

If you believe we have breached the APPs or this Privacy Policy, you may lodge a complaint with us by contacting our Privacy Officer using the details in Section 13. Please provide as much detail as possible about your concern.

We will acknowledge your complaint within 5 business days and endeavour to resolve it within 30 days. If we require additional time to investigate, we will notify you accordingly.

12.2 External Dispute Resolution

If you are not satisfied with our response to your complaint, you may refer the matter to:

- The Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au or by calling 1300 363 992
- The Australian Financial Complaints Authority (AFCA), being our external dispute resolution scheme, at www.afca.org.au or by calling 1800 931 678 (free call)
- ASIC's complaints service at www.asic.gov.au

Membership of AFCA is maintained by Walker Lane Pty Ltd as the AFSL holder. Complaints relating to the financial advice we have provided may be escalated through AFCA in accordance with AFCA's rules and jurisdiction.

13. Contact Us

For all privacy-related enquiries, access requests, corrections, complaints, or other matters under this Privacy Policy, please contact our Privacy Officer:

Entity: Fenton Group Aust Pty Ltd ATF ADF Family Trust T/AS Fenton Financial

ABN: 34 216 720 700

Email: admin@fentonfinancial.com.au

Phone: 03 5978 8001

Address: [INSERT OFFICE ADDRESS], Australia

If your enquiry relates to Walker Lane's obligations as the AFSL holder, you may also contact Walker Lane Pty Ltd directly:

Walker Lane Pty Ltd: ABN 70 626 199 826 | AFSL 509305

Website: www.walkerlane.com.au

14. Updates to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, legal obligations, or the services we provide. The current version of this Privacy Policy will always be available on our website.

Where changes are material, we will notify you by email or through a prominent notice on our website. Your continued use of our website or engagement of our services following notification of changes constitutes your acceptance of the updated Privacy Policy.

This Privacy Policy was last reviewed and updated on 9 April 2025.

This Privacy Policy has been prepared to assist Fenton Financial in meeting its obligations under the Privacy Act 1988 (Cth) and the Australian Privacy Principles. It does not constitute legal advice. Fenton Financial recommends that this document be reviewed by a qualified legal practitioner before publication on your website. Legal and regulatory requirements may change; this document should be reviewed at least annually.