

Privacy Policy

Introduction

Barsden Private Wealth Pty Ltd (ACN 153 930 799) and its licensed credit-provider subsidiary, BPW Financial Services Pty Ltd (ACN 167 343 526), and Familybusinessmatters Pty Ltd (ACN 636 168 824) are all related entities and companies registered in Australia.

In this Privacy Policy we will collectively refer to Barsden Private Wealth Pty Ltd, BPW Financial Services Pty Ltd and Familybusinessmatters Pty Ltd as “BPW”, “we”, “us” and “our”.

This is BPW’s Australian Privacy Principles’ general privacy policy yet we may also reference to related, third-party service providers’ relevant privacy policies and associated documents (including but not limited to Connective Credit Services Pty Ltd www.connective.com.au/privacy-policy). It explains how BPW respectively approaches the important issues of privacy and the management of your Personal Information.

Please contact BPW’s Privacy Officer (details are at the end of this Privacy Policy) if you require any further information regarding our Privacy Policy.

BPW provides its clients with a range of licensed financial advice, business & equity sales, succession & estate planning, credit providing and related professional advisory services.

By choosing to participate or deal with us, engage our Services and/or by using our respective websites, www.barsdenprivatewealth.com.au, www.bpwfinance.com.au and www.familybusinessmatters.com.au (“Sites”), you consent and agree to the Privacy Policy of BPW (“Policy”) as follows:

The Australian Privacy Principles

The Australian Government introduced updated legislation in 2014 to the *Privacy Act (1988)*, to further enhance the protection and handling of an individual’s privacy and personal information. These principles replace the previous National Privacy Principles that operated from 2001. You can find out more about the Australian Privacy Principles by calling the Office of the Australian Information Commissioner on 1300 36 39 92 or through their [website](http://www.oaic.gov.au) at www.oaic.gov.au.

“**Personal Information**” means information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- a) whether the information or opinion is true or not; and
- b) whether the information or opinion is recorded in a material form or not.

BPW respects and upholds your right to privacy protection under the Australian Privacy Principles in regulating how we collect, use, disclose and hold your Personal Information. We have a detailed policy and set of procedures to ensure that only authorised staff have access to your personal information, that it remains confidential and is only used for appropriate purposes and in accordance with this policy.

In addition to the Australian Privacy Principles, individuals located in the European Union (EU) may also have rights under EU based rules known as the *General Data Protection Regulation* (GDPR). The GDPR has harmonised the data privacy laws of each individual EU country, giving more rights to individuals located in the EU and more obligations to organisations holding their personal information.

Details of additional rights of individuals located in the EU and how we meet them are outlined in the relevant section below.

Lastly, please note however this policy is not intended to cover categories of personal information that are not covered by the Privacy Act or GDPR.

THE PERSONAL INFORMATION WE COLLECT, AND WHY WE COLLECT IT

Information We Receive When You Use Our Services or Site

The main types of personal information BPW collects and holds relate to the contact details and organisational roles of our clients, suppliers and other business contacts. Typically, this information includes names, birth dates, addresses, telephone numbers, e-mail addresses and job titles.

In the course of providing professional services to our clients, we may collect and hold more detailed personal information, for example:

- where relevant to the Services we are providing you, your financial information about your assets, occupation and income, bank account balances, account activities, payment history;
- government identifiers such as Tax File Number, drivers' license, passport and Medicare numbers and visa/work permit status;
- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- other contact details such as social media handles;
- shareholdings and details of investments (including Shareholder Identification Numbers e.g. HIN/SRN);
- credit information such as details relating to credit history, credit capacity and eligibility for credit ('credit worthiness');
- details of superannuation and insurance arrangements;
- educational qualifications, employment history and salary;
- membership of a political association or membership of a trade union; and/or
- personal information about your spouse and dependents.

When you use our Sites, we collect information about which of those services you have used and how you have used them. We might know, for instance, that you have visited a certain page, saw a specific ad for a certain period of time. Here's a fuller explanation of the types of information we collect when you use our services:

• **Usage Information.** We collect information about your activity through our Services. For example, we may collect information about:

o how you interact with our Services or which queries you submit.

o how you communicate with your clients (e.g. if you are an accountant using our Services).

• **Content Information.** We collect content, queries and responses that you engage with via our Services and Sites, such as custom content, and information about the content you create or provide, such as if the recipient has viewed the content and the metadata that is provided with the content.

• **Information Collected by Cookies and Other Technologies.** Like most online services and mobile applications, we may use cookies and other technologies, such as web beacons, web storage, and unique advertising identifiers, to collect information about your activity, browser, and device. We may also use these technologies to collect information when you interact with our Sites we may offer through one of our partners, such as advertising and commerce features.

Most web browsers are set to accept cookies by default. If you prefer, you can usually remove or reject browser cookies through the settings on your browser or device. Keep in mind, though, that removing or rejecting cookies could affect the availability and functionality of our Services. To learn more about how we use cookies and your choices, please check out our “Cookie Policy”. To learn more about how third parties use these technologies on our Services, be sure to read the “Analytics” section of this Policy.

• **Log Information.** We also collect log information when you use our Sites or Services. That information includes, among other things:

o details about how you have used our Services.

o device information, such as your web browser type and language.

o access times.

o pages viewed.

o IP address.

o identifiers associated with cookies or other technologies that may uniquely identify your device or browser.

o pages you visited before or after navigating to our website.

When the Law Authorises or Requires us to Collect Information

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions which require us to collect personal information, like the *National Consumer Credit Protection Act* and *The Anti-Money Laundering and Counter-Terrorism Financing Act*.

Information We Collect from Third Parties

We may collect information about you from other users, our affiliates, and third parties.

When we are checking your creditworthiness and at other times, we might collect information about you that you obtain from credit reporting bodies.

Your personal and sensitive information is only collected as is necessary for a function or activity, or to enable us to carry out our work and deliver our Services.

We may use your personal information to send you information about our work or to let you know about our Services. Each time we send you a direct marketing communication we will provide you with a simple way to “opt out” of receiving similar communications in the future.

You can also let us know that you do not wish to receive any further communications by contacting BPW’s Privacy Officer.

BPW will not collect sensitive information about health, racial or ethnic origin, political opinions or membership, religious or philosophical beliefs, trade association or union membership, sexual preferences or criminal record unless you have consented to give this information and it is relevant to our work and Services.

For example, sometimes we need to collect sensitive information about you, for instance in relation to some insurance applications. This could include things like medical checks, medical consultation reports or other information about your health.

We will always collect such information in a non-intrusive, lawful and fair manner. We will offer you the option of not identifying yourself or of using a pseudonym where it is practical to do so.

Opting-Out or Modifying Your Information

If you want to change any information that you have previously given us, or if you want to opt out of future communications please contact BPW’s Privacy Officer as detailed below.

How We Collect Your Personal Information

We collect your personal information when you provide it to BPW in a number of ways including but not limited to:

- directly from you e.g. being engaged as client to us our Services, through the Sites, job application or resume, or application forms;
- as authorised by you providing us with your personal information (subject to your preceding authorise consent to such e.g. via iFactFind.com.au, business & CRM systems and their privacy policies)
- by voluntary completion of surveys or forms;
- from public domain e.g. your business’ website;

- from authorised third-party data sources and data lists for the purposes of conducting our Services;
- from your other personal or business, advisors, partners, associates and employers;
- by your usage of the Site e.g. the pages that you visit, what links you click by contacting us by post, telephone, email, or other electronic methods.
- a Credit Representative fills-out an application (a Credit Representative Application) and information supporting the Credit Representative Application. That information may include a credit report about you that you obtain for us;
- a Broker fills out an application (a Broker Application) and information supporting the Broker Application. That information may include a credit report about you that you obtain for us;
- a Loan Writer/Employee fills out an application for accreditation (Accreditation Application) to present loan applications to our panel lenders on the Broker's behalf and information supporting the Accreditation Application;
- a referrer notification (Referrer Agreement) is filled out to notify us of the Broker's arrangement with a Referrer; or
- a third-party notification (Third-Party Notification) is filled out to notify us of a Broker's arrangement with a Third Party.

Sometimes we collect information about you from other sources. We do this only if it is necessary to do so. Instances of when we may need to include where:

- we cannot readily contact you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us; and
- at your request, we exchange information with your accounting, legal or financial advisors or other representatives.

Also:

- we may obtain information from the police or from ASIC or other government authorities to check your probity and assist it to assess the broker application or the credit representative application;
- we may obtain information from financial institutions on the Aggregator's panel of financial institutions relating to application;
- conversion ratios, application submission quality and use of online services; and
- we may ask for other information from you from time to time to enable us to improve our services.

In some cases, you might provide Personal Information to us by entering it into our cloud-based Services because you want us to host that information for you. Alternatively, your information may be disclosed to us by an organisation with whom you interact and to which we provide a cloud-based Service.

When we collect or hold Personal Information in this way, it is only used or disclosed for the purpose contemplated by you or the organisation that has disclosed that information to enable us to provide the work or Services sought.

Personal information may be stored on our web servers but will only be accessed by us to provide technical support, or to carry out other functions reasonably necessary to provide the work or Services. This Personal Information will not be disclosed in any other way without the individual's written consent.

What Do We Do When We Get Information We Did Not Ask For?

People sometimes share information with us we have not sought out (referred to as 'unsolicited information').

Where we receive unsolicited Personal Information about you, we will check whether that information is reasonably necessary for our functions or activities. If it is, we will handle this information the same way we do with other information we seek from you. If not, we will ensure we do the right thing and destroy or de-identify it.

When Will We Notify You That We Have Received Your Information?

When we receive Personal Information from you directly, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Sometimes we collect your Personal Information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How do we use your Personal Information?

- giving you information about a Service;
- considering whether you are eligible for a Service;
- processing your application and providing you with Service;
- administering the product or service we provide you, which includes answering your requests and complaints, varying products and services and managing our relevant product portfolios;
- identifying you or verifying your authority to act on behalf of a Credit Representative, a Broker, a Loan Writer/Employee, a Referrer or a Third Party;
- telling you about other products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, IM, mail, or any other electronic means including via social networking forums), unless you tell us not to;

- assisting in arrangements with other organisations in relation to a product or service we make available to you;
- allowing us to run our business and perform administrative and operational tasks, such as:
 - training staff;
 - developing and marketing products and services;
 - risk management;
 - systems development and testing, including our websites and other online channels;
 - undertaking planning, research and statistical analysis;
 - determining whether a beneficiary will be paid a benefit;
 - preventing or investigating any fraud or crime, or any suspected fraud or crime;
 - as required by law, regulation or codes binding us;
 - maintaining a database of Brokers, Loan Writers/Employees, Referrers and Third Parties, to, amongst other things, track and make payments of commissions and other amounts to them;
 - managing our relationship with you;
 - managing our relationships with our panel lenders;
 - investigating and dealing with suspected or actual unlawful activity;
 - assisting in improving industry standards relating to engaging in credit activities; and
 - assisting with recovering amounts owing to us; and
 - for any purpose for which you have given your consent

We use, in addition to our own proprietary technologies and systems, various third-party software and technologies including but not limited to: [iFactFind](#) and' to deliver some of our Services. Further, tools below if detail required:

- **iFactFind.com.au** – our online personal and financial information gathering tool for the purpose of financial advice;
- **Zoom.us** – facilitates and can record video conference and desktop sharing meetings
- **Connective Mercury** – for online questionnaires and document requests – for the purpose of gathering personal and financial information to facilitate credit advice;

- **CashDeck.com.au** – for the purpose of gathering bank, credit card and loan account statements and transactions history to facilitate credit advice;
- **CoreLogic RPData** – for the purpose of verifying real estate asset information and values to facilitate credit advice;

Please also note, owing to the ever-changing nature of technology and to provide optimal support to you, we may use different third-party support software and platforms from time to time. To that, any such data stored or processed will also be subject to the privacy policies of those relevant individual third parties and platforms as may vary.

We may use your Personal Information to the extent that is reasonably necessary to carry out the Services including for the following purposes:

- to deliver and improve our Services and the Sites.
- to provide personalised and direct marketing content to your email address, mobile phones, portable computing and other digital technology devices
- to compile analytics in sizing or quantifying market opportunity;
- to predict market opportunity forecasting and resource allocation;
- to disclose to other businesses who assist us or our clients in providing services or who perform functions on our clients' behalf;
- to conduct credit checks (if and where necessary); and

How We Keep Your Personal Information Secure

Our premises are in secure buildings with restricted access. Our IT systems are password protected and we conduct regular audit and data integrity checks.

We frequently update our anti-virus and malware software in order to protect our systems (and the data contained in those systems) from computer viruses. In addition, all our employees are required, as a condition of employment, to treat personal information held by BPW as confidential.

Whilst we store your Personal Information in our onsite servers, there may be some circumstances where your Personal Information is stored on a remote, "Cloud" or offsite server. These cloud servers may be situated outside of Australia.

If we store your Personal Information on a remote, "Cloud" or offsite server we will endeavour to protect your Personal Information through security measures such as password protection and encryption.

We retain and store your Personal Information (whether onsite, offsite or on the Cloud) indefinitely, unless you instruct us otherwise.

Destroying Personal information

We may destroy or de-identify the Personal Information provided by you once it is no longer needed for our Services. However, we may, in addition to the reasons already disclosed in this Privacy Policy, in certain circumstances be required by law to retain Personal Information after our Services have been completed.

In this case, the Personal Information will continue to be protected in accordance with this Privacy Policy. If we destroy Personal Information we will do so by taking reasonable steps and using up-to-date techniques and processes.

Disclosing your Personal Information

We may disclose your Personal Information to third parties but only for the purposes of providing the Services and for the purposes contemplated by your use of the Site.

These third parties may include:

- our panel lenders;
- industry bodies of which we are a member;
- those involved in providing, managing or administering the product or service we provide to you;
- authorised representatives of BPW who sell products or services on our behalf;
- medical professionals, medical facilities or health authorities who verify any health information you may provide;
- valuers, insurers (including lenders' mortgage insurers and title insurers), re-insurers, claim assessors and investigators;
- brokers or referrers who refer your application or business to us;
- loyalty programme partners;
- other financial institutions, such as banks;
- organisations involved in debt collecting, including purchasers of debt;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- organisations involved in surveying or registering a security property or which otherwise have an interest in such property;
- real estate agents;

- government or regulatory bodies (including ASIC and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities);
- our accountants, auditors or lawyers and other external advisers;
- guarantors and prospective guarantors of your obligations to us;
- organisations that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- organisations that participate with us in payments systems including merchants, payment organisations and organisations that produce statements for us;
- our joint venture partners that conduct business with us;
- organisations involved in a corporate re-organisation or transfer of group assets or business;
- organisations that assist with our product planning, research and development;
- mailing houses and telemarketing agencies who assist us to communicate with you;
- other organisations involved in our normal business practices, including our agents and contractors; and
- where you've given your consent.
- other digital technology services and platform-providers;
- our partners, agents or contractors (worldwide);
- mobile marketing providers (worldwide);
- data collection and marketing providers (worldwide);
- our related entities; and
- our professional advisers.

We may disclose your personal information:

- when specifically authorised by you;
- to professional, medical and insurance advisors;
- to regulatory bodies and government agencies;
- to training partners;
- to your guardian; and
- as required by law or court order.

We may disclose personal information for the following purposes:

- reporting to government agencies;
- to obtain professional, medical or insurance advice;
- for urgent health reasons;
- to comply with training requirements;
- to comply with regulatory or legal requirements;
- credit reporting and checks; and
- to comply with laws or court orders.

When we disclose your Personal Information with a third party, we will require the third party to handle your Personal Information in accordance this Policy and the Australian Privacy Principles.

BPW may sometimes use third party service providers to conduct surveys and facilitate information collection. Some of these service providers conduct all or part of their business overseas and so your personal information may be transferred overseas as a result.

BPW conducts a due diligence process before entering into an agreement with these service providers and will take all reasonable steps to ensure that your information is not used in a manner inconsistent with the Australian Privacy Principles.

Web traffic information is disclosed to Google Analytics when you visit our Sites. Google stores information across multiple countries. When you communicate with us through a social network service such as Facebook or Twitter, the social network provider and its partners may collect and hold your personal information overseas.

Visiting our Site

Our Site may use 'cookies' to improve your experience on our site, to display content more relevant to you within the Site, and to display items added while using online facilities. If you are concerned about the use of these cookies, your browser can be configured to notify you when you receive a cookie, and provide you with the opportunity to accept or reject it. You may refuse all cookies from BPW's Sites, however some functions may be unavailable.

Our Sites may use statistical information collection tools (such as Google Analytics) to track site visits, navigation and performance within our Site for the purpose of monitoring and improving the site. If you are concerned about the use of these tools, you can configure your browser to send a "Do Not Track" request with your browsing traffic.

Our Sites may also use third party cookies and Google Analytics Advertising Features including: Remarketing with Google Analytics, and Google Analytics Demographics and Interest Reporting.

Visitors can opt-out of Google Analytics for Display Advertising and customize Google Display Network ads using the Ads Settings. Further information regarding behavioural advertising, including ways to manage your online privacy, is available at <https://www.staysmartonline.gov.au/>.

Where you provide your email address to BPW we will only use it for the purpose provided unless you have consented to us using it for additional purposes, and we will not pass it on to any other person or organisation unless we have disclosed this to you. We may also disclose your information where required by law to do so.

Our Sites may contain links to other sites of interest. We do not control, and are not responsible for, the content or privacy practices of those websites. Please check the Privacy Policies on other websites before you provide your personal information to them.

Our Sites' Security

By using our Sites you acknowledge and agree that the internet is inherently insecure and that you use the internet at your own risk. You acknowledge that you do not hold BPW liable for any security breaches, viruses or other malicious software that may infect your computer or other internet browsing device, or any loss of data, revenue or otherwise that may occur as a result of using our Sites.

We strive to ensure the security of your Personal Information and we take reasonable steps to protect your Personal Information from:

- a) misuse, interference and loss; and
- b) unauthorised access, modification or disclosure.

We will review and update our physical and data security measures in light of current technologies. Unfortunately, no data transmission over electronic, mobile data and communication services can be guaranteed to be totally secure.

For security purposes, any Personal Information that we receive and/or provide to third parties will be password protected.

In addition, our employees and contractors who provide services related to our information systems are obliged to respect the confidentiality of any Personal Information held by us.

We will do everything reasonably within our power and control to prevent unauthorised use or disclosure of your Personal Information. However, we will not be held responsible for events arising from any unauthorised use or access to your Personal Information.

Certain sections of our Site are secured using industry-standard SSL/TLS technology to encrypt data between your browser and the Site.

Social Networking Services

We may use social networking services such as Facebook, LinkedIn and Twitter to communicate with you and the public about our Services. When you communicate with us using these social networking and digital media services we may collect your Personal Information, but we only use it to help us to communicate with you and the public.

The social networking and digital media services will also handle your Personal Information for its own purposes. These services have their own privacy policies. You can access the privacy policies for [Facebook](#), [LinkedIn](#), [Instagram](#) and [Twitter](#) on their websites.

Spam Act

We adhere to the *Spam Act 2003 (Cth)*. The Spam Act prohibits the sending of unsolicited emails, SMS and MMS messages for commercial purposes from or within Australia or to people in Australia. The Spam Act also bans the supply and use of software designed to harvest email addresses.

ADDITIONAL RIGHTS FOR INDIVIDUALS LOCATED IN THE EUROPEAN UNION (EU)

The EU General Data Protection Regulation (GDPR) has harmonised the data privacy laws of each individual EU country, giving more rights to individuals located in the EU and more obligations to organisations holding their personal information. In this section, “personal information” means any information relating to an identified or identifiable natural person (the meaning given to the term “personal data” in the GDPR).

Personal information must be processed in a lawful, fair and transparent manner. As such, if you are located in the EU, the GDPR requires us to provide you with more information about how we collect, use, share and store your personal information as well as advising you of your rights as a “data subject”.

If you are located in the EU and have an enquiry relating to your rights under the GDPR, please contact our Privacy Officer at compliance@barsdenprivatewealth.com.au.

What personal information do we collect?

Please refer to the above section headed “The Personal Information We Collect, and Why We Collect It” for details of the personal information we collect.

Special categories of personal information

The GDPR provides additional protection for personal information about your racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, biometric data (for example your fingerprints), or data concerning your health, sex life or sexual orientation. We will only process this type of personal information with your consent or where otherwise lawfully permitted.

How long we keep your personal information

We will keep your personal information while you are a client of BPW. We aim to keep your personal information for only as long as we need it.

We generally keep your personal information for up to 7 years after you stop being a client but we may keep your personal information for longer to fulfil legal or regulatory obligations, for internal research and analytics, or to respond to a question or complaint.

How we use your personal information

We can only collect and use your personal information if we have a valid lawful reason to do so. For BPW, these reasons are:

- if we need to process your personal information in order to fulfil a contract you have with us, or because you have asked us to take specific steps before entering into a contract (*contract performance*);
- if we need to process your personal information for us to comply with the law (*legal obligation*);
- if you have given clear consent for us to process your personal information for a specific purpose (*consent*); and
- if we need to process your personal information for our legitimate interests or the legitimate interests of a third party unless there is a good reason to protect your personal information which overrides these legitimate interests (*legitimate interests*).

In the table below, we have set out the relevant grounds that apply to each purpose of data processing that is mentioned in this Privacy Policy:

Purposes of the data processing	Reasons/ uses
To provide and administer our Services	<ul style="list-style-type: none"> • contract performance • legitimate interests (to allow us to perform our obligations and provide services to you)
For marketing purposes	<ul style="list-style-type: none"> • legitimate interests (in order to market to you) and consent (which can be withdrawn at any time)
To provide client support	<ul style="list-style-type: none"> • contract performance • legal obligation • legitimate interests (to allow us to correspond with you in connection with our services)
To comply with our legal obligations	<ul style="list-style-type: none"> • legal obligation • legitimate interests (to cooperate with the law and regulatory authorities)
To conduct market, consumer and other research	<ul style="list-style-type: none"> • legitimate interests (to ensure that we understand our clients' requirements)
To ensure website content is relevant	<ul style="list-style-type: none"> • legitimate interests (to allow us to provide you with the content and services on our Site)

Your rights as a data subject

You have the following rights with respect to the personal information we hold about you.

The right to be informed how personal information is processed: You have the right to be informed how your personal information is being collected and used. If we require your consent to process your personal information you can withdraw consent at any time. If you withdraw consent, we may not be able to provide certain services to you. The right to withdraw only applies when the lawful basis of processing is consent.

The right of access to personal information: You can access your personal information that we hold by emailing our Privacy Officer at compliance@barsdenprivatewealth.com.au.

The right to rectification: You have the right to question any personal information we have about you that is inaccurate or incomplete. If you do, we will take reasonable steps to check the accuracy and correct it.

The right to erasure: You have the right to ask us to delete your personal information if there is no need for us to keep it. You can make the request verbally or in writing. There may be legal or other reasons why we need to keep your personal information and if so, we will tell you what these are.

The right to restrict processing: You have the right to ask us to restrict our use of your personal information in some circumstances. In this situation we would not use or share your personal information while it is restricted. This is not an absolute right and only applies in certain circumstances.

The right to data portability: In some circumstances you have the right to request we provide you with a copy of the personal information you have provided to us in a format that can be easily reused.

The right to object: In some circumstances you have the right to object to us processing your personal information.

Rights in relation to automated decision making and profiling: We sometimes use systems to make automated decisions (including profiling) based on personal information we have collected from you or obtained from other sources such as credit reporting bodies. These automated decisions can affect the services we offer you. You can ask that we not make decisions based on automated score alone or object to an automated decision and ask that a person review.

The right to lodge a complaint with a supervisory authority: You have the right to complain to the regulator if you are not happy with the outcome of a complaint. Please refer to the [European Commission Website](#) for details of the relevant data protection authorities. The individual regulator's websites will tell you how to report a concern.

Please note that while any changes you make to your personal information will be reflected in active user databases instantly or within a reasonable period of time, we may retain all information you submit for backups, archiving, prevention of fraud and abuse, analytics, satisfaction of legal obligations, or where we otherwise reasonably believe that we have a legitimate reason to do so.

You may decline to share certain personal information with us, in which case we may not be able to provide to you some of the features and functionality of our services.

Changes to our Privacy Policy

BPW may, without notice, amend or modify this Privacy Policy by posting the amended Privacy Notice to our Sites.

How to Access, Correct or Update Your Personal Information

If you have any complaints, questions or concerns about what information BPW holds or about the accuracy of that information, please contact BPW's Privacy Officer.

If you would like to access the information that we hold about you, or to complain about a possible breach of the Australian Privacy Principles, you can write to BPW's Privacy Officer at the address provided below.

We will respond to your complaint or endeavour to give you access to the information requested within two weeks. In order to maintain the confidentiality of your personal information, we will ask you to meet with you so we can review your specific identification documents before we give you access. If it is not practical for you to meet us in person, we will arrange to check your identification before we mail the information out to you.

If the information that we hold about you is incorrect or not up-to-date, we will update it as soon as possible after you have shown us how and why it is incorrect.

In the unlikely event that we are unable to provide you with access to your personal information for legal reasons as specified in the Privacy Act, we will provide you with reasons for denying access.

If you are not satisfied with BPW's response to your complaint, question or concern, you may wish to lodge a complaint with the Office of the Australian Information Commissioner. Further information can be found on the Commissioner's website or by calling 1300 363 992.

Site accessibility

We are committed to providing an accessible experience for users of our Sites. If you encounter any difficulties with our Sites, please direct your enquiry to

Privacy Officer's contact details

BPW's Privacy Officer can be contacted by:

- Phone: (08) 9468 0342
- Email: paul@barsdenprivatewealth.com.au
- Office Address: 7/20 Faure Lane, Dunsborough WA 6281.