Oreana Financial Services Privacy Policy

Who We Are

Oreana Financial Services Pty Ltd ("Oreana"), an Australian Financial Services Licensee that provides financial advice services to clients across Australia, takes its obligations under the Commonwealth Privacy Act 1988 (Cth) (Privacy Act) seriously to protect your personal information.

About This Policy

This policy explains how Oreana collects, holds, uses and discloses your personal information in accordance with applicable privacy laws. We are bound by the Privacy Act and manage your personal information in line with the Australian Privacy Principles (APPs).
This policy applies to your dealings with us as a client. We recommend you read it carefully to understand how we handle your information and the steps we take to protect your privacy.

Personal and Sensitive Information

The Privacy Act protects your personal information, which is information or an opinion about an identified individual (or a reasonably identifiable individual). This may include details such as your name, contact details, date of birth, financial information, employment information and other information we collect in providing our services.

The Privacy Act also provides additional protections for sensitive information, including your racial or ethnic origin, religious beliefs, health information, genetic information, biometric information (for example, fingerprints or facial recognition data), and other sensitive details.

We only collect and use sensitive information where it is reasonably necessary for us to provide our services or meet our legal and regulatory obligations. If we need to collect sensitive information, we will generally do so with your consent, unless we are otherwise permitted or required by law to collect or use it without consent.

Purpose of Collection

We and/or our officers, employees, contractors and agents collect, hold, use and disclose information to assist us in our relationship with you. This information is collected from you, from the transactions performed on your behalf and/or from other persons and organisations.

If you do not provide the information we need, we may be unable to provide the product or service you requested. We may also be required by law to collect information from or about you for specific purposes (for example, to identify you).

The types of information collected include, but are not limited to:

- information which identifies you (your name, date of birth, contact details, residence and citizenship status);
- information which relates to your financial affairs, business, employment, income or assets;
- information which arises or is required in connection with the transactions you do with us or through us;
- information which helps us to process applications made by you for particular products and services; and
- information relevant to product development or marketing.

Anonymity and Pseudonymity

All advice-related interactions do require your personal information to be provided to ensure your advice is personalised and relevant to your circumstances. If you decline to provide us with your personal advice, we may not be able to provide you with any advice or services.

In scenarios of a general nature, you may choose to deal with Oreana either anonymously or using a pseudonym. Examples include:

- requests for brochures or general information;
- anonymous feedback or complaints (that do not require personal information to enable investigation).

How We Collect Your Personal Information

We collect your personal information directly from you or from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party.

If you access our websites, we may also collect personal information when you interact with our website or online services. This may include technical information such as your IP address, device identifiers, browser type, operating system, pages viewed, and the date and time of access. We may use cookies and similar technologies, including analytics tools, to help operate our website, improve functionality and user experience, and monitor website performance.

How We Use Your Personal Information

We collect, hold, use and disclose personal information so we can provide you with financial and credit products, advice and services relevant to your needs. We may also collect, use and disclose your information for related purposes such as:

- complying with our legal obligations, such as verifying your identity under anti-money laundering and counter-terrorism financing laws (AML/CTF)
- assisting with your questions and complaints
- arranging for services to be provided by third parties
- internal operations, such as record keeping, data analytics, auditing or training
- promotion of other products and services that may be of interest to you (You may opt out of marketing communications at any time).

We collect, use, hold and sometimes disclose personal information about financial advisers, credit representatives and other people with whom we do business (including employees) to administer and manage our business operations. This information is afforded the same standard of care as that of our clients.

How We Store and Secure Your Personal Information

We store your personal information in your client files or electronically. These files are accessible only to authorised personnel, are appropriately secured, and are subject to confidentiality requirements.

Personal information is treated as confidential information, while sensitive information is treated as highly confidential. We retain personal information as required by law and for business purposes, typically for at least 7 years.

Meeting Recording and Use of AI-Generated File Notes

In line with our commitment to quality, compliance, and transparent record-keeping, please be aware that all meetings, including in-person, telephone, and video conferences, may be recorded for quality assurance, training, and regulatory purposes.

We may also use secure AI technologies to assist in generating meeting summaries or file notes. These tools support the efficient and accurate documentation of discussions and are used in accordance with our privacy and data protection obligations. In these cases, recording is mandatory unless you explicitly opt out.

By participating in a meeting, you acknowledge and consent to:

- The meeting being recorded; and
- The potential use of AI tools to assist in preparing file notes.

A copy of the file note or meeting summary is available upon request. To request a copy, please get in touch with us in writing at contact@oreanapartnerships.com.au.

Sending information overseas

Depending on the nature of the engagement or purpose of collection, we may disclose your personal information to other entities and suppliers overseas in accordance with the Privacy Act. These countries may include (though not limited to) Singapore, Hong Kong and the United States.

We may store, process, or back up your personal information on servers located overseas (including through third-party service providers). In some circumstances,

Oreana also uses third-party services from overseas providers to perform its functions and deliver services. Services such as CRM, cloud storage, paraplanning, and transcription may involve overseas disclosure of personal information.

By providing your personal information to us, you acknowledge and consent to that information being processed on behalf of Oreana Financial Services by third-party service providers. We do not sell, publish or release personal information, and we take reasonable steps to protect your personal information. However, some service providers may be located overseas or may not be subject to privacy protections equivalent to the Australian Privacy Principles. In those cases, we have taken reasonable steps to ensure that the recipient does not breach the Act and the Australian Privacy Principles.

Accessing and updating personal information

Any requests regarding the privacy of your personal information should be made to us in writing and addressed to the Privacy Officer.

There may be circumstances where we refuse to provide you with the information you request, for example, when the information is commercially sensitive. In these situations, we will inform you and explain why.

We will deal with requests for access to your personal information as soon as possible and aim to respond within 10 business days. The time we require will depend on the type of information requested.

We need your contact details, including your current home address, email address, and phone number. You can update your personal information over the phone by contacting your adviser or broker, or electronically.

Your Rights

The Privacy Act and the Australian Privacy Principles outline our obligations and your rights. For example, you have the right to:

- know why your personal information is being collected, how it will be used and to whom it will be disclosed
- have the option of not identifying yourself, or of using a pseudonym in certain circumstances
- ask for access to your personal information (including your health information)
- stop receiving unwanted direct marketing
- ask for your personal information that is incorrect to be corrected
- make a complaint about us if you think we've mishandled your personal information

Important

This document provides an overview of our privacy policies and procedures (in addition to those that may apply to specific Services and transactions), the disclosures we are required to make by law, and

other matters. It is not intended to constitute legal advice in relation to your rights under any privacy legislation or any other matter.

Notifiable Data Breaches

We take the security of your personal information seriously. In the event of a suspected or actual data breach, we will promptly assess the incident to determine whether it is an “eligible data breach” under the law.

If we determine that a data breach is likely to result in serious harm to any individual, we will take appropriate steps to contain and remediate the breach. We will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches (NDB) scheme.

Where appropriate, we will also provide information about the breach, the type of information involved, and recommended steps you can take to protect yourself.

If you are not satisfied with our response to your privacy complaint, you may contact the Office of the Australian Information Commissioner (OAIC) for further information or to lodge a complaint. The OAIC can be contacted via its website at oaic.gov.au or by phone on 1300 363 992.

Contact Us about Privacy

Further information on our privacy policies and procedures is available from our office.
Please address to:

Oreana Financial Services Pty Ltd
31 Alfred St, Level 3
The Hub, Customs House
Sydney NSW Australia
Phone: (61) 2 7238 4192

Or

contact@oreanapartnerships.com.au

Complaints about privacy

If you are concerned about how your personal information has been collected, used, or disclosed, and you wish to make a complaint, please contact us using the details outlined above.

We will acknowledge receipt of a complaint within 1 business day. We will then investigate the complaint and respond to you within a maximum of 30 days following receipt of your initial complaint.

The Australian Financial Complaints Authority (AFCA) can consider certain privacy complaints should you feel the response from Oreana is not satisfactory and wish to escalate. The contact details for AFCA are:
Australian Financial Complaints Authority

- Online: afca.org.au
- Email: info@afca.org.au
- Phone: 1800 931 678 (freecall)
- Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001