Privacy Policy

Version: 2.0
Effective Date: 17 November 2026

1. Purpose
Springboard Wealth AFSL ("we", "our", "the AFSL") is committed to protecting the privacy of all clients, employees, authorised representatives, and other individuals whose personal information we collect.
This Privacy Policy outlines how we manage personal information in accordance with:

- **Privacy Act 1988 (Cth)**
- **Australian Privacy Principles (APPs)**
- **Corporations Act 2001 (s912A obligations)**
- **ASIC regulatory expectations for AFSL holders**
- **Anti-Money Laundering and Counter-Terrorism Financing Act 2006** (where applicable)

Our objective is to ensure transparency, security, and trust in the way we collect, use, store, and disclose personal information.

2. Scope
This policy applies to:

- All personal information collected from **clients**, **prospective clients**, **employees**, **job applicants**, **authorised representatives**, **contractors**, and **service providers**
- All personal information handled through our systems, platforms, websites, and outsourced providers
- All advice, administration, compliance, HR, and operational activities under the AFSL

3. What Personal Information We Collect
We collect personal information necessary to provide financial services, meet legal obligations, and manage our business operations.

3.1 Client Information

- Name, date of birth, gender
- Contact details
- Financial information (income, assets, liabilities, insurance, superannuation, investments)
- Tax File Number (TFN) (collected and stored in accordance with ATO rules)
- Identification documents (driver licence, passport, Medicare card)
- Risk profile, goals, and advice preferences
- Sensitive information (with consent), including health information for insurance advice

TFN Practical AFSL Best Practice
Authorised Representatives must not record a client's TFN in file notes, emails, meeting notes, task management systems or any document where the TFN is not specifically required. Where practical, TFNs should only be retained within application forms, superannuation documentation, or approved secure client record systems.

TFNs should be redacted from file audit packs, compliance reviews, training examples and complaint investigation documents unless the TFN itself is relevant to the matter under review.

3.2 Employee and Adviser Information

- Employment and qualification records
- Background checks, police checks, ASIC banning checks
- HR files, performance records, payroll information
- Banking details for remuneration
- Professional memberships and CPD records
- Compliance monitoring data

3.3 Website and Digital Information

- IP address, device information, browser type
- Website usage analytics
- Cookies and tracking data

3.4 Sensitive Information

We only collect sensitive information where:

- Required by law (e.g., AML/CTF)
- Necessary for advice (e.g., insurance underwriting)
- You have provided **explicit consent**

4. How We Collect Personal Information

We collect information through:

- Client meetings, fact finds, and onboarding forms
- Digital forms, portals, and secure uploads
- Phone calls, emails, and correspondence
- Authorised representatives and employees
- Third-party providers (e.g., product issuers, insurers, platforms)
- Publicly available sources (e.g., ASIC registers)

Where reasonable, we collect information directly from the individual. If information is collected from a third party, we take steps to ensure the individual is aware.

5. Why We Collect Personal Information

We collect personal information to:

- Provide financial advice and related services
- Verify identity and meet AML/CTF obligations
- Assess suitability of financial products
- Manage client relationships and service delivery
- Meet AFSL compliance and reporting obligations
- Manage employment and adviser relationships
- Conduct training, supervision, and monitoring
- Improve our services, systems, and client experience

Failure to provide required information may limit our ability to provide services.

6. Use and Disclosure of Personal Information

We use and disclose personal information only for the purposes for which it was collected or as permitted by law.

6.1 We may disclose information to:

- Product issuers, insurers, superannuation funds, and investment platforms
- External paraplanners and administrative support providers
- Compliance consultants and auditors
- IT service providers, CRM systems, and cloud hosting providers
- External dispute resolution bodies (e.g., AFCA)
- Government agencies (ATO, ASIC, AUSTRAC)
- Professional advisers (legal, accounting, actuarial)

6.2 Cross-Border Disclosure

Where personal information is stored or processed overseas, we ensure:

- The provider meets Australian privacy standards
- Appropriate contractual safeguards are in place
- Clients are informed where required

6.3 Artificial intelligence and computer-assisted decisions

We may use computer programs, including artificial intelligence where applicable, to support the provision and administration of financial advice. This may include collecting and summarising client information, preparing meeting records, assisting with risk profiling and needs analysis, researching and comparing financial products and strategies, modelling potential outcomes, preparing and reviewing Statements of Advice and other advice documents, and supporting ongoing reviews and compliance checks.

Depending on the task, our advice tools may use information about your circumstances, financial goals, risk profile, income, expenses, assets, liabilities, investments, superannuation and insurance. We use identification and contact details where needed for client administration and identity verification. For insurance advice, we may use relevant health information in secure systems approved for that purpose, with your consent where required by law.

Computer-assisted decisions

We use these programs to assist with assessing your circumstances and needs, identifying and comparing potential strategies and products, calculating projections, and preparing proposed recommendations. These activities may inform decisions about the advice we recommend, including investment selection and asset allocation, superannuation and retirement strategies, insurance types and levels of cover, contributions, withdrawals and debt management. These recommendations may significantly affect your financial position and interests.

These programs are used as aids to support your adviser's professional judgement. Your adviser reviews relevant outputs, considers their accuracy and suitability in light of your individual circumstances, objectives and needs, and remains responsible for all advice and recommendations provided to you, including the obligation to act in your best interests.

Our use of these programs is subject to our privacy, information security and cybersecurity policies and procedures, including safeguards designed to protect your personal information against misuse, loss and unauthorised access or disclosure. Further information about how we protect your personal information is provided elsewhere in this policy.

Decisions made solely by computer programs

We do not use computer programs to make decisions solely by automated means that could reasonably be expected to significantly affect your rights or interests.

You may contact our Privacy Officer using the details in section 14 if you have questions about these practices or wish to request access to, or correction of, your personal information.

7. Data Security and Storage
We take reasonable steps to protect personal information from:

- Unauthorised access
- Misuse or interference
- Loss or theft
- Modification or disclosure

Security measures include:

- Encrypted data storage
- Secure client portals
- Multi-factor authentication
- Access controls and role-based permissions
- Staff training and cybersecurity protocols
- Secure destruction of records after retention periods

8. Data Retention
We retain personal information for the period required by law, including:

- **7 years** after advice or service delivery
- **7 years** after employment or adviser termination
- Longer where required for legal or regulatory purposes

After this period, information is securely destroyed or de-identified.

9. Access and Correction
Individuals may request access to or correction of their personal information.
We will:

- Provide access unless restricted by law
- Correct inaccurate, incomplete, or outdated information
- Respond to requests within a reasonable timeframe

Requests can be made to the Privacy Officer (details in Section 14).

10. Anonymity and Pseudonymity
Where lawful and practical, individuals may interact with us anonymously or using a pseudonym. This is generally not possible when providing financial advice due to legal obligations.

11. Direct Marketing
We may use personal information for direct marketing where:

- The individual has provided consent, or
- It is permitted under the Privacy Act

Individuals may opt out at any time. We do **not** sell personal information to third parties.

12. Use of Cookies and Website Tracking
Our website uses cookies and analytics tools to improve user experience. Users may disable cookies through their browser settings, though some features may not function correctly.

13. Complaints Handling
If an individual believes their privacy has been breached, they may lodge a complaint with our Privacy Officer.
We will:

- Acknowledge the complaint
- Investigate promptly
- Provide a written response

If unresolved, individuals may contact:

- **Office of the Australian Information Commissioner (OAIC)**
- **AFCA** (for client-related matters)

14. Contact – Privacy Officer
Email: compliance@springboardwealth.com.au
Phone: 1300 428 313
Address: *Level 12, 412 St Kilda Road, Melbourne VIC 3004*