Australia Pacific Funds Management
ABN: 34 132 463 257
Australian Financial Service License (AFSL) 339151
[w] 03 8621 8485
Level 13 North, 459 Collins Street, Melbourne VIC 3000
www.apfm.fund

Privacy Policy

1. Overview

Australia Pacific Funds Management Pty Ltd (referred to as **"APFM", "we", "us" or "our"**) is committed to protecting your privacy. We handle personal information in accordance with:

- Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs), as amended by the Privacy and Other Legislation Amendment Act 2024;
- Corporations Act 2001 (Cth);
- Australian Securities and Investments Commission Act 2001 (Cth); and
- Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).

This Policy applies to APFM and all wholly-owned subsidiaries and related entities. We review it regularly and update it when laws or our business practices change.

2. Collection of Personal Information

What we collect	Typical examples	Why we collect it
Identification & contact details	Name, date of birth, address, email, phone, occupation, government-issued ID (e.g. driver licence)	To open and maintain your account, verify your identity and meet AML/CTF obligations
Financial information	Income & expenses, assets & liabilities, tax file number (TFN), superannuation, bank details	To provide financial advice, arrange products and administer investments
Sensitive information (only with consent)	Health or medical data for insurance applications or claims, union or professional-association membership (if relevant to insurance)	To obtain risk-insurance quotes or assess claims

We collect information:

- directly from you (application forms, fact-finds, meetings, phone, secure portals);
- from third parties you authorise (e.g. accountants, super funds, insurers); or
- from publicly available sources where lawful.

You may decline to provide information; however, this may delay or prevent us from giving advice, securing insurance or processing transactions.

3. Use of Personal Information

We use your information only for the purpose for which it was obtained, including to:

- provide and manage financial planning, lending and investment services;
- assess product suitability and insurance eligibility;
- meet legal / regulatory obligations (e.g. AML/CTF reporting, breach notifications);
- communicate market updates, newsletters or offers **unless you opt out**; and
- improve our services through analytics and client-experience reviews.

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4. Disclosure

We may disclose information to:

- related APFM entities and authorised representatives who service your account;
- product issuers, custodians, insurers, reinsurers and claims assessors;
- technology and administration vendors (e.g. advice software, cloud hosting, paraplanning) who are bound by confidentiality agreements;
- regulators and government agencies where required or authorised by law; and
- anyone you expressly authorise.

5. Data Security

APFM maintains administrative, technical and physical safeguards to protect information from misuse, interference, loss and unauthorised access. Measures include encryption in transit and at rest, multi-factor authentication for client portals, regular penetration testing and staff privacy training.

Information no longer required is securely destroyed or de-identified.

6. Direct Marketing

We may use your non-sensitive contact details to send newsletters, market commentary or invitations to seminars. You can opt out at any time by using the unsubscribe link or contacting us.

7. Complaints & Contact Details

Sarah Jansens
Australia Pacific Funds Management Pty Ltd
Level 13 North, 459 Collins Street, Melbourne VIC 3000
Phone: (03) 8621 8484 Email: sarah.jansens@apfm.fund

8. Review of this Policy

This Policy will be reviewed at least annually, or sooner if legislative or operational changes require. The latest version is always available at **www.apfm.fund**