



Financial Services Guide (FSG)

Version v3.0 (17 March 2022)

The purpose of this guide

The purpose of this Financial Services Guide (FSG) is to help you make an informed decision about the services and information on how to engage with one of our advisers.

This FSG covers the following information:

- Information about TLK Financial Services Pty Ltd as an Australian Financial Service Licence.
- Details on how you may instruct your adviser
- Who will be responsible for providing the financial service.
- Details of the financial services and/or products we can provide
- Remuneration received by TLK Financial Services Pty Ltd and your adviser
- Other forms of remuneration or benefits
- The complaints procedure

Please take the time to review this document before engaging our services.

Throughout this FSG, TLK Financial Services Pty Ltd Pty Ltd is referred to as “we”, “us”, “our” or any variations. The term “adviser” refers to TLK Financial Services Pty Ltd’s Authorised Representatives.

TLK Financial Services Pty Ltd (ABN 50 640 424 433), is an Australian Financial Services Licensee (AFSL No. 522950).

TLK Financial Services Pty Ltd has approved the distribution of this FSG.

TLK Financial Services Pty Ltd

Head office: Level 6, 85 George Street Parramatta NSW 2150

Postal address: PO Box 1419, Parramatta NSW 2124

Phone: 02 8090 7546

E: info@tlkpartners.com.au

You, your adviser and TLK Financial Services

You have decided that you would like the services of a financial adviser. Regulatory requirements and the Law require all financial planning advisers to either hold an Australian Financial Service License (AFSL for short) or to be authorised by an AFSL holder. This is where TLK Financial Services comes in. Your adviser has chosen to be associated and appointed as an Authorised Representative of TLK Financial Services and is therefore able to provide you with financial advice under the TLK Financial Services AFSL. TLK Financial Services provides your adviser with training, research, compliance, technical and operational support, professional indemnity insurance and access to a free dispute resolution service. TLK Financial Services is ultimately responsible for the advice provided by your financial adviser and has obligations to fulfil to maintain the AFSL, one of these obligations includes monitoring the advice financial advisers provide to you, their client.

Our services

Your adviser acts on behalf of TLK Financial Services Pty Ltd, as the authorising Licensee, and TLK Financial Services Pty Ltd is responsible for the financial services provided to you.

Your adviser can provide you with services including:

- Assisting you identify, establish, and prioritise your needs and objectives.
- Financial Planning Advice (wealth creation, cashflow/budgeting advice, retirement income strategies)
- Personal risk management advice and planning for your desired lifestyle including life insurance.
- Strategic advice for Estate planning (such as asset ownership) and aged care strategies.
- Social security advice.
- We can also assist with the management of your investments and superannuation.
- Debt reduction strategies, redundancies, and inheritances.
- Financial modelling - understanding your current financial position and projecting your future.
- Tax (financial) advice.

We can also provide you with advice and support on a range of financial products such as:

- Bank savings products and cash management accounts.
- Personal Superannuation products including Self-Managed Super Funds.
- Retirement income products including annuities, allocated pensions, and account-based pensions.
- Managed funds, exchange traded funds, bonds, debentures and direct equities (stocks).
- Life Insurance cover (personal and business) including Death Cover, Trauma Insurance, Total & Permanent Disablement Insurance, and Income Protection Insurance.
- Investor Directed Portfolio Services (IDPS)
- Retirement Savings Accounts (RSA)
- Securities

As a registered tax (financial) adviser, your adviser can provide tax advice related to how your financial products work. For comprehensive taxation advice about your personal tax position you should seek advice from a qualified taxation specialist or accountant.

Specific information on your adviser, their experience and specialisation are provided in Part Two of this guide titled “Adviser Profile”.

Lack of independence

TLK Financial Services Pty Ltd, and its Corporate Authorised Representatives, receive commissions from life insurance companies, neither financial services businesses are independent, impartial or unbiased. The Corporations Act states that if a licensee or an Authorised Representative receives commissions from a product issuer it cannot claim to be independent, impartial or unbiased. All commissions will be disclosed to you in advance.

We can act on your instructions

After you engage us as your adviser, we can act on your instructions whether you provide them by telephone, email, fax, or other means of communications.

Important documents you can expect to receive

If we provide you with personal financial planning advice, we will confirm our recommendations in writing so that you can make an informed decision about the appropriateness and suitability of our advice. Our recommendations will be documented in a Statement of Advice (SoA). From time to time, a Record of Advice (RoA) may be used to record our advice to you where we have provided you with subsequent advice, and you have been given an SoA initially, and your personal circumstances have not changed. The RoA may be provided to you or added to your file and if you would like a copy of this document, or our initial SoA, we will make it available to you on request for up to seven (7) years.

Where we recommend specific financial products to you, we will provide you with a Product Disclosure Statement (PDS) which contains specific and important information on the financial product. It is very important for you to read and understand the PDS which must be provided to you before you can take any action in relation to a financial product recommended.

Furthermore, you may receive a Fee Disclosure Statement (FDS) annually detailing fees you have paid and, service renewal notices to 'opt in' to retain our services.

The interests, associations and relationships that may influence or affect our advice.

TLK Financial Services Pty Ltd is a private company and has no ownership by or associations with any product providers. Our recommendations to you will be based on our assessment of your personal circumstances, needs and objectives. Under the Financial Planners and Advisers Code of Ethics, we cannot advise, refer, or act in any other manner where we assess that a conflict of interest or duty exists between ourselves and a client. Where we identify a conflict of interest created by an interest, association, or relationship applicable to your situation, we will explain this to you, and advise you that we cannot act on your behalf accordingly.

TLK Financial Services Pty Ltd, and its Corporate Authorised Representatives, receive commissions from life insurance companies, neither financial services businesses are independent, impartial or unbiased. The Corporations Act states that if a licensee or an Authorised Representative receives commissions from a product issuer it cannot claim to be independent, impartial or unbiased.

TLK Financial Services Pty Ltd has common shareholders and/or beneficial ownership with TLK Accountants Pty Ltd. TLK Mortgage and Finance Brokers Pty Ltd, TLK Wealth Pty Ltd and TLK NDIS Disability and Aged Care Services Pty Ltd.

How you pay for services

The cost of providing a financial product or service to you will depend on the nature and complexity of the advice, financial product and/or service provided. Generally, whenever your adviser provides a recommendation for a financial product or service, your adviser may be remunerated through either:

- An initial adviser service fee;
- An ongoing adviser service fee;
- A 'fee for service';
- An Implementation fee;
- Commission payments from insurance product providers, or;
- A combination of any of the above.

All fees or commissions are initially paid to TLK Financial Services Pty Ltd before being distributed proportionately to TLK Wealth Pty Ltd, your adviser's financial services business.

The actual costs are detailed in the 'Adviser Profile' attached to this FSG

Your adviser is a shareholder and director of TLK Wealth Pty Ltd. As such he is remunerated by distributions from TLK Wealth Pty Ltd.

Other forms of remuneration or benefits

TLK Financial Services and/or its advisers may receive nonmonetary benefits where:

- The amount is less than \$300 and identical or similar benefits are not given on a frequent basis;
- The benefit has a genuine education or training purpose (including attendance to conferences) and is relevant to providing financial product advice; and/or
- The benefit consists of the provision of information technology software or support and is related to the provision of financial product advice in relation to the financial products issued or sold by the benefit provider.

Sponsorship

TLK Financial Services and its related companies may receive payments or benefits from product providers in return for granting rights such as being recognised as a sponsor and the right to promote their product and give presentations at conferences and/or professional development training days. TLK Financial Services may use these payments to pay for costs associated with such conferences, training or professional development days.

Referrals

Should you be referred to your adviser by a third party, such as an accountant or mortgage broker, the third party may receive a fee for the referral. You will receive more detailed information concerning any referral fee in your SoA or other relevant document.

Privacy Statement

TLK Financial Services is committed to protecting your privacy. The purpose of our Privacy Policy is to ensure that you understand the ways in which we collect, maintain, use and disclose your personal information and how we comply with the Australian Privacy Principles. TLK advisers keep records containing the personal information that you have provided, as well as documents and details of your financial objectives, situation and needs. We also keep records of advice documents and recommendations provided to you for 7 years. On request, we will provide you with copies of your personal information and advice documents, although a fee may apply in respect of any costs that we incur in doing so. A copy of our Privacy Policy is available at www.tlkpartners.com.au.

Feedback or complaints about our services

TLK Financial Services Pty Ltd are committed to providing quality advice to you. This commitment extends to providing accessible complaint resolution mechanisms for our clients. If you have any complaint about the service provided to you, you should take the following steps:

1. Contact your adviser immediately.
2. If your complaint is not acknowledged within 1 working day, please contact TLK Financial Services Pty Ltd within 7 days via telephone on 02 8090 7546 or, put it in writing and send to: The Complaints Manager, PO Box 1419, PARRAMATTA NSW 2124.
3. Alternatively, if your complaint is not satisfactorily resolved by the adviser within 7 days, please contact TLK Financial Services Pty Ltd within 7 days via telephone on 02 8090 7546 or, put it in writing and send to: The Complaints Manager, PO Box 1419, PARRAMATTA NSW 2124.

If we cannot reach a satisfactory resolution within a further 23 days (Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution), you can send your complaint to, The Australian Financial Complaints Authority (AFCA), GPO Box 3, Melbourne Victoria VIC 3001. You can also contact AFCA by free call on 1800 931 678 or, online via www.afca.org.au or, email via info@afca.org.au.

If you have a complaint relating to tax (financial) advice services that your adviser has provided or if you feel that your adviser has breached the Tax Practitioners Board Code of Professional Conduct, and we cannot provide you with a satisfactory response to your complaint, then you can make a complaint to the Tax Practitioners Board via www.tpb.gov.au. The Australian Securities and Investment Commission (ASIC) also has a tollfree infoline on 1300 300 630 which you may use to make a complaint and obtain more information about your rights.

It is a condition of our Australian Financial Services Licence that we maintain a level of Professional Indemnity Insurance appropriate for its size and the scale and complexity of its operations. Our insurance covers claims made against TLK Financial Services Pty Ltd and its authorised representatives, including those representatives who no longer work for us, but did so at the time of the relevant conduct. The policy is annually reviewed for currency and suitability.



TLK WEALTH PTY LTD

Adviser Profile

Your Adviser is Matthew Mousa Authorised Representative No. 1237777

Matthew is employed by TLK Wealth Pty Ltd (ABN: 15 605 435 532) Authorised Representative No. 1007998.

Both Matthew and TLK Wealth Pty Ltd are authorised representatives of TLK Financial Services Pty Ltd.

Qualifications and experience

- Master of Financial Planning
- Graduate Diploma of Financial Services (Financial Planning)
- Advanced Diploma of Financial Services (Financial Planning)
- Diploma of Financial Planning
- Tax for Financial Advising
- Commercial Law (Financial Planning)
- Self-Managed Superannuation Fund (SMSF)
- Aged Care Professional Program

My financial planning and advice services

Under this authority Matthew can act for retail and wholesale clients by:

1. Providing financial advice on the following areas:

- A. Setting your specific goals and objectives
- B. Managing cashflow including budgeting
- C. Managing debt
- D. Investing monies
- E. Borrowing to invest
- F. Superannuation
- G. Structuring or restructuring of trusts, companies, small business and Self-Managed Superannuation
- H. Aged Care
- I. Social Security / Centrelink
- J. Income Streams
- K. Tax (financial) advice

2. Dealing in a financial product (apply for, acquire, vary, or dispose of a financial product) on behalf of another person in respect of the following classes of financial products:

- A. Deposit and Payment Products—Basic Deposit
- B. Deposit and Payment Products—Non-Basic Deposit
- C. Government Debentures, Stocks or Bonds
- D. Life Products—Investment Life Insurance Products
- E. Life Products—Life Risk Insurance Products
- F. Managed Investment Schemes, including IDPS
- G. Retirement Savings Account Products
- H. Securities such as ASX listed shares
- I. Superannuation including Self-Managed Superannuation Funds, Corporate Superannuation Funds, public offer funds, account based pensions, and complying annuities

Our financial planning process

The following is a summary of the process that we will go through with you in order to develop, and maintain, a financial plan suited to your individual needs, circumstances, and goals.

Initial Consultation	<p>Discussion with you to discuss your needs for advice, and how we can assist you to meet your goals, needs and objectives.</p> <p>During this discussion we will also explain our services and fee structure to you.</p>
Discovery Process	<p>In order to provide you with advice that is appropriate to your individual circumstances, we need to collect personal and financial information from you.</p> <p>To do this, we will ask you to complete some forms, including a Client Data Collection Form and a Client Risk Profile Questionnaire.</p> <p>We may also ask for other documentation such as superannuation statements, bank statements, etc.</p> <p>Your adviser will assist you through this process.</p>
Determining your financial and lifestyle goals	<p>Once we have gathered sufficient information about you, we can assist you to determine what your specific advice needs and objectives are.</p> <p>We will consider both your immediate financial needs, as well as your future goals and requirements, giving priority to those matters that are most important to you.</p>
Engagement to Proceed	<p>At this point, we will provide you with our Terms of Engagement. This will detail our understanding of your advice requirements, the specific services we propose to provide to meet those requirements, and how much it will cost you.</p>
Developing and Delivering your Financial Plan	<p>We will prepare our advice recommendations to you within a “Statement of Advice” (SoA). This document will provide you with detailed information on the strategies and products that we recommend to assist you to meet your goals and objectives.</p> <p>We will present this to you, typically face to face (or virtually) so that we can answer any questions you may have. We will give you time to consider our recommendations and will only proceed once we are sure that you understand and agree to our advice recommendations.</p>
Implementation of our recommendations	<p>Once you have agreed to our recommendations and provided all relevant authorities to proceed, we will then implement our recommendations. This includes handling all fund and policy administration on your behalf, liaising with product and platform providers and other professional advisers as appropriate.</p>

Ongoing Review and management	<p>As part of our financial planning process, we provide annual ongoing review services to ensure that the recommendations that we provide remain appropriate to you over time, and as circumstances change.</p> <p>We will ask you to agree to an appropriate ongoing advice service when we present your financial plan</p>
--------------------------------------	---

We will always agree on the level of our charges and your payment options before proceeding with any work. Our Terms of Engagement will confirm the fee and specific services to be provided.

We will not charge you until you have agreed how we are to be remunerated.

How we will provide advice to you

We will document your financial plan within a document entitled a 'Statement of Advice'. The Statement of Advice will detail:

- A summary of your current situation, including your goals, needs and objectives
- The financial products, and strategic recommendations to you
- Information about how each of our recommendations will put you in a better position to achieve your financial and lifestyle goals
- Information on risks, costs and benefits associated with our recommendations
- Our Ongoing Service offering – detailing how we will work with you on an ongoing basis to ensure your financial plan remains appropriate
- Details about our advice fees – including Statement of Advice and Ongoing Review fees as applicable
- An “Authority to Proceed” confirming your agreement to proceed with our recommendations, and your Ongoing Review Service.

My service fees

The cost of providing a financial advice service to you including initial consultation, strategy development, product considerations and a Statement of Advice including implementation of that advice will depend upon the nature and complexity of the advice and or service provided. Fees for my advice and services may be based on either a fee for service arrangement, commission or a combination of both.

Risk (life) insurance commissions

Where we recommend risk insurance products to you, rather than charging a fee for service, we may receive commissions directly from the insurance company. These commissions are paid from the product costs and are not an additional cost incurred by you. The commission payable will depend on the product recommended, and on the amount of the premium paid or amount invested.

Initial or up-front commissions will be paid to us by the insurance company when your policy is implemented. The amount of commission payable will range from 0%-66% of the premium paid.

Ongoing commissions will be paid to us on a yearly basis on the anniversary of your policy and will range from 0% to 22% of the premium paid.

For example,

If your initial premium was \$1000 we will receive \$660. If the premiums for the second and subsequent years was \$1000 we will receive \$220.

Our fees are based on revenue expected to be received from any insurance policies. If you cancel your policy within 2 years, TLK Wealth Pty Ltd and your adviser reserve the right to invoice you and claim back any pro rata loss of income incurred as a result during that period.

Fee options

I offer an initial complementary consultation at my expense, to get to know you and to identify how I can partner with you to help you meet your goals, however if you require urgent personal advice or documents to be signed at this initial meeting please let me know in advance so I can confirm if a fee will be charged for this service.

At our initial consultation, I will explain how I operate, what you can expect and my payment options. All fees and commissions payable by you will be explained to you at the time the advice is given and fully detailed in the Statement of Advice document.

Below is a summary of the types of fees that you may be charged which are inclusive of GST. The below fees will be charged as agreed with you or to the extent permitted by law.

Fee Type	Minimum %/\$	Maximum %/\$
Advice Fee	\$330	\$22,000
SoA Fee	\$330	\$22,000
Implementation Fee	\$330 per hour	2.2% of transaction value up to \$22,000.
Ongoing Service Fee	\$330 per hour + 0.66%	\$1,000 per month + 2.2% of funds under management
Insurance Initial Commission	0%	0.66%
Insurance Ongoing Commission	0%	0.22%
Insurance Claim Fee	\$330 per hour	Up to \$22,000 or 15.5% of claim value. The cost of this service is dependent on the type of claim and insured amount. The cost will be discussed with you prior to any work commencing.
Share Trade Brokerage Fees	\$0	Greater of \$55 or 0.66% of trade value

Ongoing service

TLK Wealth Pty Ltd offers a comprehensive Ongoing Review Service. This service allows us to make sure that you stay on track to meet your financial and lifestyle goals and requirements.

Should you require such services, your Ongoing Review Service may include services such as:

- An Annual Review of your Financial Plan
- Access to your adviser, including for ad-hoc phone, email queries and face to face meetings
- Regular reviews of your Investment portfolio
- Liaison with product providers and other relevant professionals where required, i.e. accountants, solicitors, mortgage brokers
- Liaison with Centrelink or DVA for Pension entitlements (if applicable)
- If you have a Self-Managed Superannuation Fund, we will review your portfolio at least once per year, including reviewing the Investment Strategy annually (if applicable)

Depending of your individual circumstances and the level of engagement you want from you adviser, your Ongoing Review Service will be tailored to your needs.

Review of your financial plan

As part of the Ongoing Review Service, we will review your Financial Plan and make any changes to investments or strategies as required to ensure that your Plan remains appropriate, particularly as your circumstances change over time.

A financial review generally consists of the following touch points:

- Review your current circumstances and objectives to see if there have been any changes
- Review the continuing suitability of your financial plan
- Review your investment or superannuation portfolio(s)
- Review of any taxation or legislative changes that may affect your financial plan
- Make recommendations for any changes to investments or strategy as required
- Implement any agreed changes to your financial plan

Fees for ongoing Service

You may be charged an ongoing service fee. This fee will be dependent on the service levels required to provide ongoing advice, regular reviews and professionally manage your financial plan to ensure that you are kept up to date and your strategies remain current. Our ongoing service fee starts from 0.66% of funds under management plus \$330.00 per hour, while the maximum is \$12,000, per annum plus 2.2% of funds under management.

Our Ongoing Review fees may be invoiced directly to you (deducted from a nominated personal account), or fees may be deducted from your investment funds (which would be paid to us by the product providers).

If you require any other services that are outside of your Ongoing Review Service, this is known as Ad-hoc advice. Our current ad-hoc advice fee is \$330.00 per hour.

The method of calculation of your Ongoing Review Fee (whether it be as percentage of funds invested or a fixed dollar fee) will be detailed within the Statement of Advice. We will also provide an estimate of the fee prior to proceeding, within the Statement of Advice.

We will not charge you an ongoing fee until you have agreed (in writing) to proceed with the Ongoing Review Service. We will also seek your consent to deduct fees from your investment where relevant.

Claims management services

In the event we provide claims management assistance to you in relation to an insurance claim, and the claim is successful, we may charge you a claims management fee. We will agree upon this fee with you before we provide the service to you. Our fee for this service is dependant on the complexity of the claim and can be between \$330 and 15.5% of the total claim payout.

For example, after a successful claim with a payout of \$250,000 you would pay a maximum of \$38,750 management fee.

Your payment options

You have a choice of how to pay our fee. You can either be invoiced directly, our fee can be debited from your credit card or bank account or debited directly from funds invested.

Referrals to other providers

We may refer you to other professionals such as accountants or solicitors if you require advice in these areas. We will not receive any fees or benefits for these referrals.

Referral arrangements I have include:

- TLK Wealth Pty Ltd refers self-managed super funds to TLK Accountants Pty Ltd.
- TLK Wealth Pty Ltd refers accounting services to TLK Accountants Pty Ltd.
- TLK Wealth Pty Ltd refers mortgage broking and lending services to TLK Mortgage & Finance Brokers Pty Ltd.
- TLK Wealth Pty Ltd refers aged and disability care services to TLK NDIS Disability and Aged Care Services Pty Ltd.
- TLK Wealth Pty Ltd may assist you to engage other professionals for example, solicitors where no formal referral arrangement exists.

If you have been referred to Us by a third party, we may pay them a referral fee, if applicable, details of this will be provided in your written Statement of Advice.

TLK Wealth Pty Ltd

Address: Level 6, 85 George Street Parramatta NSW 2150

Postal address: PO Box 1419, Parramatta NSW 2124

Phone: (02) 8090 7546

Email: admin@tlkwealth.com.au

Website: www.tlkpartners.com.au

Important Notice: The Adviser Profile must be accompanied with an approved Financial Services Guide issued by the Licensee TLK Financial Services Pty Ltd.

We maintain information about you

The following statement contains important information about the records that will be made of the services that we provide you, as well as the privacy and confidentiality arrangements applicable to you.

TLK Financial Service's privacy statement

General

TLK Financial Services Pty Ltd and its associated entities (collectively, **TLK**) like other companies operating in Australia, is bound by the Australian Privacy Principles set out in the Privacy Act 1988 (Cth) (**Privacy Act**) which impose certain requirements on TLK with respect to handling personal information. TLK has implemented procedures to ensure that personal information is handled in accordance with the Act. TLK has issued this policy in compliance with the Privacy Act.

Please read the following policy to understand how TLK deals with the personal information that it may collect about you from time to time. This policy may change from time to time, so please revisit the policy periodically.

For the purpose of this policy and the Privacy Act "Personal Information" means information or an opinion (including information or an opinion forming part of a document or other source), whether true or not, and whether recorded in a material form or not, about a person whose identity is apparent, or can be reasonably ascertained, from the information or opinion.

Collection of Information

Collection of Information from You

TLK collects and uses Personal Information for the purpose of carrying out its business and complying with laws and regulations that may require the collection and disclosure of such information.

The personal information TLK may collect include the following:

- name
- address
- DOB
- e-mail addresses
- telephone numbers
- tax file number
- any other information that you have provided TLK as a result of our dealings with you.

To assist TLK in providing quality services, it is important that the information you entrust to us is complete, accurate and up-to-date. For example, if you are applying for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance. You can help us to keep your information up to date by contacting us immediately if your contact details change.

We may also collect personal information if authorised or required by an Australian law or court or tribunal order to collect that information. We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order.

For example, when you make an application for a financial product TLK is required under the Anti-Money Laundering and Counter-Terrorism Financing Act to collect certain information from you to prove your identity, such as your driver's licence or passport details. TLK may collect your Australian tax file number (TFN). It is not compulsory to provide your TFN, but if you do not, any investments arranged by TLK may deduct withholding tax from your distribution payments at the highest marginal rate. TLK will collect your TFN to determine whether you are subject to withholding tax on any distribution payments you receive and for communication purposes of distribution payments to the Australian Taxation Office. If TLK collects your TFN, we will handle your TFN in accordance with the Privacy Act and Guidelines issued by the Commissioner.

TLK may also be required to ask about your tax residency status under taxation information sharing agreements the Australian Government has in place with other countries. For example, a tax treaty between Australia and the United States formed under US law (Foreign Account Tax Compliance Act) requires TLK to ask investors in our funds whether they are US citizens or US tax residents when they make an application. If you are a tax resident of another country, the relevant treaty or law may require us to collect your relevant foreign tax identification number.

Collection of Information from Third Parties

With your consent, TLK may collect personal information from a third party or it may collect information from sources you would reasonably expect, for example, information extracted from publicly available sources such as public domain websites or telephone directories.

TLK may also collect information about how you use our website to help us better tailor our services to you. For example, TLK may do this when you click on a link from the TLK website. Usually, the information we collect in this way is general information only derived from cookies – such as the number of visitors to a site or statistics about how a site is browsed – and does not identify you. If TLK does identify you with this information (for example, if you have been logged onto an online TLK service), any use or disclosure of that information will be in accordance with this Privacy Policy.

Collection of Sensitive Information

Collection of Sensitive Information from You

Sensitive information is personal information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, genetic information or health information.

TLK will not collect, use or disclose sensitive information about you unless we need the information for one of our functions or activities and we have your consent (or we are legally required to do so). For example, we may collect health information about you to process a claim under an insurance policy.

Use and Disclosure Of Personal Information

How we may use and disclose your personal information

TLK may use and disclose personal information we collect about you for several purposes including:

- to consider your request for a product or service;
- to enable TLK to provide a product or service;
- to tell you about other products and services that may be of interest to you;
- to assist in arrangements with other organisations (such as loyalty partners) in relation to the promotion or provision of a product or service;
- to manage accounts and perform other administrative and operational tasks (including risk management, systems development and testing, staff training and market or customer satisfaction research);
- to consider any concerns or complaints you raise against TLK and/or to manage any legal action between you and TLK;
- to prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- to identify you or establish your tax status under any Australian or foreign legislation, regulation or treaty pursuant to an agreement with any tax authority; and
- as required by relevant laws, regulations, codes of practice and external payment systems.

If TLK uses your personal information for direct marketing of its products or services, it will provide you with the opportunity, at the point of our first contact and at any time afterwards at your request to decline receipt of any further marketing information. Otherwise, TLK will neither use nor disclose your Personal Information that is not related to the purpose for which we collected your information in the first place without your consent, unless:

1. It is required for public health or public safety or other emergency reasons; or
2. It is required to investigate or report suspected fraud or unlawful activity; or
3. It is required or authorised by law; or
4. TLK believes that the use or disclosure is reasonably necessary for one or more of the following by or on behalf of an enforcement body:
 - a. the prevention, detection, investigation, prosecution or punishment of criminal offences, breaches of a law imposing a penalty or sanction or breaches of a prescribed law;
 - b. the enforcement of laws relating to the confiscation of the proceeds of crime;
 - c. the protection of the public revenue;
 - d. the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct;
 - e. the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of the orders of a court or tribunal.

**Disclosing your
Personal
Information
Overseas**

TLK may need to disclose your personal information to organisations overseas. These overseas organisations are service providers, including related entities, which perform a range of technology, operational and customer service functions on TLK's behalf.

TLK will not transfer personal information outside Australia unless TLK reasonably believes that the recipient of the information is subject to a law, binding scheme or contract providing the same standards of protection of personal information as provided for under the Australian Privacy Principles.

Data Quality

TLK will take reasonable steps to ensure that your personal information is accurate, complete and current.

TLK will take reasonable steps to destroy or permanently de-identify your personal information, if it is no longer needed for any purpose for which the information may be used or disclosed under the [Use and Disclosure section](#) of this policy.

Data Security

TLK will protect your Personal Information from misuse and loss and from unauthorised access, modification or disclosure.

TLK may store your personal information in hardcopy documents or electronically. TLK maintains physical security, such as locks and security systems, over our paper and electronic data stores and premises. TLK also maintains computer and network security. For example, TLK uses firewalls (security measures for the internet) and other security measures such as identification codes and passwords to control access to computer systems. TLK continually maintains and monitors its online security systems to ensure that TLK's online services are secure and that your personal information is appropriately protected when you use these services.

We require you to keep your personal identification number (PIN), passwords and access codes confidential and secure at all times. This means that you should not disclose your PIN, passwords or access codes to any other person. You should contact TLK immediately if you believe that your PIN, passwords or access codes may have been disclosed to another person or if you would like to change your PIN or password.

Transparency

TLK Privacy Policy is available at www.tlkpartners.com.au (the company's website) from where an electronic copy can be downloaded.

Access and Correction

If you wish to verify what information (if any) TLK holds on you and/ or whether that information held is correct, you may either:

- call (02) 8090 4324;
- email info@tlkpartners.com.au; or
- apply in writing to:
TLK Financial Services
PO Box 1419, Parramatta NSW 2124

TLK will take reasonable steps to confirm the identity of the person making the request and will endeavour to respond within 14 business days of receiving the request. However, where the request is more complex or time consuming to comply with, TLK will endeavour to provide access to the information requested within 28 business days.

TLK reserves the right to deny access to personal information if providing access:

- a. could pose a possible threat to life or health; or
- b. could cause an unreasonable impact on the privacy of others; or
- c. would be in response to a frivolous or vexatious request; or
- d. relates to existing or anticipated legal proceedings which could be prejudiced as a result; or
- e. relates to existing or anticipated commercial negotiations involving TLK, and TLK legitimate commercial interests could be prejudiced as a result; or
- f. is in any way unlawful; or
- g. would be likely to prejudice an investigation of possible unlawful activity; or
- h. would circumvent a request to TLK by an enforcement body performing a lawful security function to not provide access to the information because providing access would jeopardise national security; or
- i. would likely prejudice:
 - (i) the prevention, detection, investigation, prosecution of criminal offences, breaches of the law imposing a penalty or sanction or breaches of prescribed law; or
 - (ii) the enforcement of laws relating to the confiscation of the proceeds of crime; or
 - (iii) the protection of public revenue; or
 - (iv) the prevention, detection, investigation or remedying of seriously improper conduct or prescribed conduct; or
 - (v) the preparation for, or conduct of, proceedings before any court or tribunal, or implementation of its orders by or on behalf of an enforcement body.

**Access and
Correction
(continued)**

However, where providing access would reveal evaluative information generated within the company in connection with a commercially sensitive decision-making process, TLK may give the individual an explanation for the commercially sensitive decision rather than direct access to the information.

Where there is disagreement about direct access or where direct access to personal information is impractical or inappropriate, TLK will discuss the possible use of a mutually acceptable intermediary.

If you advise TLK that your personal information is held on you is inaccurate, incomplete or not up-to-date, TLK will take reasonable steps to update the information accordingly. Should there be a disagreement between TLK and you about whether the personal information is complete or up-to-date then at your request, TLK will take reasonable steps to associate a statement from you that the information is not correct with the relevant record(s) held by TLK.

TLK reserves the right to levy a reasonable charge to meet the costs of providing access to personal information, although there will be no charge for lodging a request for access.

TLK will provide reason(s) should it deny access to or correction of personal information it holds.

Identifiers

TLK will not use an identifier assigned to an individual by a Government Agency or related body as its own identifier; nor will it provide such an identifier to a third party without the individuals consent, unless:

- a. the use or disclosure is necessary for TLK to fulfil its obligations to the Agency or related body; or
- b. one or more of [Use and Disclosure section numbered items 1-4](#) (inclusive) apply to the use or disclosure; or
- c. the use or disclosure is by a prescribed organisation of a prescribed identifier in prescribed circumstances.

Anonymity

Wherever lawful and practical, TLK will give you the option of not identifying yourself when dealing with the company.

Complaints

Wherever lawful and practical, TLK will give you the option of not identifying yourself when dealing with company people who may potentially be subject of your complaint or where you may seek to complain about any aspect of TLK's management of your personal information.

You may either:

- call (02) 8090 4324; or
- email info@tlkpartners.com.au; or
- apply in writing to:
TLK Financial Services Pty Ltd
PO Box 1419, Parramatta NSW 2124

In both instances you must set out full details of the complaint. To help TLK complete a quick and effective investigation, the complainant should include as much detail as they have available to assist the TLK Privacy Officer to identify the nature and scope of the complaint.

The Privacy Officer will maintain a record of all complaints received, including but not limited to:

- name and contact details of the complainant
- date the complaint was received
- nature of the complaint
- details of the person(s) investigating the complaint
- outcome of the investigations
- dates and details of all contacts made with the complainant

These records will be held in a secure manner by the Privacy Officer, and will only be accessible to management of TLK or people in the business to which the complaint relates. Otherwise, they will only be made available, if required or authorised by law or to assist with any investigations carried out by the office of the Federal Privacy Commissioner.

The Privacy Officer or his or her designate will also be responsible for investigating privacy complaints.

All complaints will be acknowledged within 1 working day and a full response given within 30 days. Where it is not possible to complete the investigation of a complaint within 30 days, the complainant will be contacted once thirty days have elapsed with an estimate of when the investigation will be completed.

Disclaimer

TLK Financial Services Pty Ltd (ABN 50 640 424 433), is an Australian Financial Services Licensee (AFSL No. 522950). This privacy Statement version 3 is dated 17 March 2022 and represents TLK's policy at that date.

TLK may revise this policy as it sees fit or at its discretion.

Although TLK intends to observe this policy at all times, neither TLK nor any of its entities nor its associated companies is legally bound in any respect by this policy. From time to time, TLK reserves the right to act outside the policy and may do so, subject only to any statutory rights you have under the Act or other applicable legislation