

Privacy Policy

How we collect, use and protect your personal information

Your financial future, personally guided.



About This Policy

This Privacy Policy explains how Mandalay Wealth Management Pty Ltd (MWM, we, us, our) collects, uses, stores and discloses your personal information. It applies to all clients, prospective clients and visitors who interact with our business.

MWM complies with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs), the Privacy and Other Legislation Amendment Act 2024 (Cth) and the Notifiable Data Breaches (NDB) scheme.

SECTION A

Introduction

1. About This Policy

1.1 This Privacy Policy explains how Mandalay Wealth Management Pty Ltd (ABN 31 132 276 576, AFSL 331535) (**MWM, we, us, our**) collects, holds, uses and discloses personal information in accordance with the *Privacy Act 1988* (Cth) (**Privacy Act**), the Australian Privacy Principles (**APPs**), the *Privacy and Other Legislation Amendment Act 2024* (Cth), and the Notifiable Data Breaches (**NDB**) scheme.

1.2 Personal information is any information or opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not and whether recorded in a material form or not.

1.3 Sensitive information is a subset of personal information and includes health information, biometric information, racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of professional or trade associations or trade unions, sexual orientation or criminal record. We will only collect sensitive information with your consent or where required by law.

1.4 By engaging our services, providing us with your personal information, or visiting our website, you consent to our collection, use and disclosure of your information in accordance with this policy.

2. Our Obligations

2.1 As an Australian Financial Services (AFS) licensee, MWM is subject to multiple overlapping privacy and data protection obligations including:

- Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles
- Privacy and Other Legislation Amendment Act 2024 (Cth) — in effect from 10 December 2024
- Notifiable Data Breaches (NDB) scheme — mandatory notification of eligible data breaches to affected individuals and the OAIC
- Corporations Act 2001 (Cth) — breach reporting obligations to ASIC under Division 3, Part 7.6
- ASIC Regulatory Guide 78 — Breach reporting by AFS licensees
- Cyber Security Act 2024 (Cth) — mandatory reporting of ransomware payments

SECTION B

Collection of Personal Information

3. Why We Collect Personal Information

3.1 We collect personal information when it is reasonably necessary for our functions and activities as a licensed financial advice business. We will not collect information that is irrelevant to providing you with financial services.

3.2 These purposes include:

- Providing financial advice, planning services and related products to you
- Assessing your financial position, goals, risk tolerance and eligibility for products and strategies
- Preparing Statements of Advice (SOA), Records of Advice (ROA), Fact Finds and related documents
- Complying with our legal obligations under the Corporations Act, AML/CTF laws and tax legislation
- Verifying your identity in accordance with Anti-Money Laundering and Counter-Terrorism Financing laws
- Monitoring, evaluating and improving our products and services
- Detecting and preventing fraud and illegal activity
- Communicating with you about your account, services, and any changes to our terms or this policy
- Gathering aggregated statistical and research data to improve our services

4. What Information We Collect

4.1 The personal and sensitive information we typically collect includes:

- Identification details — full name, date of birth, gender, residential and postal address
- Contact details — telephone, email address
- Financial information — income, assets, liabilities, superannuation balances, investment accounts, tax file number, Centrelink details
- Employment information — employer, occupation, salary, employment type
- Insurance information — existing policies, claims history, health and lifestyle information for life and income protection insurance applications
- Estate planning information — will, powers of attorney, beneficiary nominations
- Risk profile information — your investment risk tolerance and goals
- Identity verification documents — passport, driver's licence

5. How We Collect Information

5.1 We collect personal information directly from you wherever possible — during initial consultations, through the completion of Fact Find questionnaires, via email, telephone, or through our client portal.

5.2 We may also collect information from third parties with your authority, including:

- Superannuation funds, investment platforms and insurance providers (via Third Party Authority)
- Your accountant, solicitor or other professional advisers
- Financial institutions and banks
- Government agencies including the ATO and Centrelink
- Credit reporting bodies where relevant

5.3 If you provide incomplete or inaccurate information, we may not be able to provide you with the advice or services you are seeking.

SECTION C

Use and Disclosure of Personal Information

6. How We Use Your Information

6.1 We use your personal information only for the purposes for which it was collected, or for directly related purposes that you would reasonably expect. This includes:

- Preparing and delivering financial advice and strategies
- Implementing investment, superannuation, insurance and estate planning recommendations
- Ongoing review and monitoring of your financial plan and portfolio
- Meeting our compliance, reporting and regulatory obligations
- Communicating with you about your account and services
- Training and quality assurance of our team (using de-identified data where possible)

7. Who We May Share Your Information With

7.1 We may disclose your personal information to the following parties, only to the extent necessary to provide you with our services:

- Financial product providers — superannuation funds, investment platforms, managed funds, insurance providers
- Your accountant, solicitor, SMSF auditor or other professional advisers (with your authority)
- Paraplanning, administration and software service providers engaged by MWM
- DASH financial planning software and related third-party integrations
- ASIC, AFCA, the OAIC and other regulatory bodies where required by law
- Our professional indemnity insurer
- Law enforcement or government agencies where required or authorised by law

7.2 We do not sell, trade or rent your personal information to third parties for marketing purposes.

8. Overseas Disclosure

8.1 Some of our software and service providers may store or process data overseas, including cloud-based platforms. Where we disclose personal information to overseas recipients, we take reasonable steps to ensure those recipients handle your information in accordance with the APPs or a comparable privacy framework.

8.2 Under the Privacy and Other Legislation Amendment Act 2024 (Cth), the Australian Government is developing a whitelist of countries with substantially similar privacy protections. We will update this policy as that framework develops.

9. Software-Assisted Decision Making

Automated Decision Making — Disclosure (Privacy Act 2024)

MWM uses financial planning software tools (including DASH and third-party research platforms) that assist our advisers in analysing client data, modelling financial scenarios and generating advice recommendations. All final advice decisions are made by a qualified human adviser — software outputs are used as tools to inform, not replace, professional judgment. From 10 December 2026, new obligations under the Privacy and Other Legislation Amendment Act 2024 will require us to provide further detail about any substantially automated decision-making processes that have a significant effect on individuals. We will update this policy accordingly.

SECTION D

Direct Marketing

10. Marketing Communications

10.1 We may use your personal information to send you information about our services, market updates, regulatory changes, or educational content relevant to your financial circumstances — but only where you have not opted out of receiving such communications.

10.2 We will not disclose your personal information to third parties for their direct marketing purposes without your express consent.

10.3 You can opt out of marketing communications at any time by:

- Contacting us by phone on 02 8616 9000
- Emailing us at Contact@mandalaywm.com.au
- Using the unsubscribe link in any electronic communication we send you

10.4 We will process your opt-out request promptly and within a reasonable time. Note that even if you opt out of marketing communications, we may still contact you where required for the delivery of financial services or for compliance purposes.

SECTION E

Security of Personal Information

11. How We Protect Your Information

11.1 MWM takes the security of your personal information seriously. We implement reasonable technical and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification and disclosure, in accordance with APP 11 and the enhanced security obligations under the Privacy and Other Legislation Amendment Act 2024.

11.2 Our security measures include:

- Secure, encrypted client management systems with access controls
- Staff training on privacy obligations and data handling
- Password-protected systems and two-factor authentication where available
- Secure document storage and controlled physical access to our premises
- Regular review of our security practices and technology

11.3 When personal information is no longer required for the purposes for which it was collected, and we are not required by law to retain it, we will take reasonable steps to de-identify or securely destroy it.

12. Data Breaches — Notifiable Data Breaches Scheme

12.1 MWM is subject to the Notifiable Data Breaches (NDB) scheme under the Privacy Act 1988. If we become aware of an eligible data breach that is likely to result in serious harm to you, we are required to:

- Notify the affected individuals as soon as practicable
- Notify the Office of the Australian Information Commissioner (OAIC)
- Take all reasonable steps to contain and remediate the breach

12.2 We are also required to report significant breaches of our core obligations to ASIC within 30 calendar days under Regulatory Guide 78 and the Corporations Act 2001.

12.3 If you believe your personal information held by us may have been compromised, please contact us immediately at Contact@mandalaywm.com.au or 02 8616 9000.

Under the Privacy and Other Legislation Amendment Act 2024 (Cth), effective from 10 December 2024, individuals now have a statutory right to sue for serious invasions of privacy. MWM takes this obligation seriously and is committed to handling all personal information with care, transparency and respect for your rights.

SECTION F

Access, Correction and Complaints

13. Accessing Your Personal Information

13.1 You have the right to request access to the personal information MWM holds about you (APP 12). We will respond to your request within 30 days. In most cases we will provide access free of charge, however in some instances a reasonable administrative fee may apply for complex requests.

13.2 To request access, please contact us in writing at Contact@mandalaywm.com.au or by post to Level 4, Suite 412, 5 Celebration Drive, Bella Vista NSW 2153. We will verify your identity before providing access.

13.3 We may refuse access in limited circumstances permitted by the Privacy Act, for example where access would be unlawful, would endanger someone's health or safety, or would unreasonably impact the privacy of another person. We will advise you in writing if we refuse access and explain our reasons.

14. Correcting Your Personal Information

14.1 You have the right to request that we correct personal information we hold about you that is inaccurate, out of date, incomplete, irrelevant or misleading (APP 13). Please contact us using the details in this policy.

14.2 We will take reasonable steps to correct your information within 30 days of receiving a correction request. If we correct information that was previously disclosed to a third party, we will notify that party of the correction where practicable.

14.3 If we decline to correct your information, we will provide written reasons and explain how you can request a review or lodge a complaint.

15. Making a Privacy Complaint

15.1 If you have a concern about how we have handled your personal information, please contact us first so we can attempt to resolve your complaint promptly.

**Step
1**

Contact Us Directly

Raise your concern with us by phone (02 8616 9000) or email (Contact@mandalaywm.com.au). We will acknowledge your complaint within 2 business days and aim to resolve it within 30 days.

**Step
2**

Escalate Internally

If you are not satisfied with our initial response, ask to have your complaint reviewed by our Principal Adviser. We will provide a written response within 30 days.

**Step
3****External Dispute Resolution**

If your complaint cannot be resolved internally, you may contact the Office of the Australian Information Commissioner (OAIC). Phone: 1300 363 992 | www.oaic.gov.au | GPO Box 5218, Sydney NSW 2001

SECTION G

Website, Cookies & Additional Information

16. Website and Cookies

16.1 When you visit www.mandalaywm.com.au, we may collect information such as your IP address, browser type, pages visited and time spent on our site. This information is used in aggregate form to improve our website and is not linked to your personal identity.

16.2 Our website may use cookies — small text files stored on your device — to improve your browsing experience. You can disable cookies through your browser settings, though this may affect some website functionality.

17. Children's Privacy

17.1 Our services are directed at adults. We do not knowingly collect personal information from individuals under 18 years of age without the consent of a parent or legal guardian. A Children's Online Privacy Code is currently being developed by the OAIC under the Privacy and Other Legislation Amendment Act 2024 and we will update our practices accordingly when it comes into effect (expected by 10 December 2026).

18. Tax File Number (TFN) Information

18.1 We may collect your Tax File Number where required or authorised by the *Income Tax Assessment Act 1997* and related legislation, for example in connection with superannuation contributions or investment accounts. TFN information is treated with the highest level of confidentiality and is not disclosed except as required by law.

19. Updates to This Policy

19.1 MWM will review and update this Privacy Policy periodically to reflect changes in our business, legal obligations and best practice. The current version will always be available at www.mandalaywm.com.au. We will notify you of material changes by email or through our client portal.

19.2 This policy was last updated on 9 April 2026.

Contact Us — Privacy Enquiries

If you have any questions about this Privacy Policy or how we handle your personal information, please contact us:

Mandalay Wealth Management Pty Ltd

Level 4, Suite 412, 5 Celebration Drive, Bella Vista NSW 2153

Phone: 02 8616 9000 | Email: Contact@mandalaywm.com.au | Website: www.mandalaywm.com.au

This Privacy Policy is issued by Mandalay Wealth Management Pty Ltd ABN 31 132 276 576 AFSL 331535. It is subject to the Privacy Act 1988 (Cth), the Privacy and Other Legislation Amendment Act 2024 (Cth) and the Australian Privacy Principles. This document does not constitute legal advice.