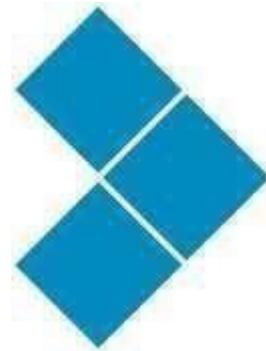


Vinarc



Financial Services Guide Part 1

What you need to know about Vinarc, our financial services and
our relationship with you

28th February 2020

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Why do I need to read this guide?

This guide is designed to provide information about the financial services provided by Vinarc Pty Ltd ABN 92 609 798 683 ASFL 484222 and its authorised representatives and how we work with you if you decide to use these financial services.

This guide gives you information about:

- Who Vinarc is
- Who our advisers are
- What services we offer you
- How we work with you and others
- How we are paid for these services and
- What you can do if you have any concerns

This guide is only complete when the Vinarc adviser's profile is attached.

Vinarc has authorised the distribution of this guide.

Who is Vinarc?

Vinarc is an Australian Financial Services Licensee (AFSL) licensed by the Australian Securities & Investment Commission (ASIC).

Vinarc is responsible for the advice and conduct of your Vinarc adviser. We are not responsible for any unauthorised services they may offer (to the full extent permitted by law), so please check the services your adviser offers in their profile.

Vinarc has professional indemnity insurance which covers us and our advisers for errors or mistakes relating to our services. The insurance meets the requirements of the Corporations Act 2001 (Corporations Act) and covers claims against our advisers after they cease to be engaged by us, provided that the insurer is notified of the claim when it arises and within the relevant policy period.

Who is my Vinarc adviser?

Your adviser is authorised by Vinarc to provide you with financial advice on our behalf. Vinarc advisers undergo rigorous training and professional development to continue to meet the high professional standards that we set.

Your adviser's profile is attached to this guide and forms part of this guide. The adviser profile will provide more detail of their individual experience and the services they offer. If the adviser profile is not attached please ask the

adviser for this profile or contact our head office.

Your adviser will:

- advise you to the best of their ability
- deal with you efficiently, honestly, and fairly
- tailor advice to your individual needs
- recommend products approved by Vinarc and
- implement recommendations only after you have agreed they are appropriate for you.

What can Vinarc advise me on?

As an AFSL, Vinarc is licensed to advise you on and deal in the following classes of financial products to retail and wholesale clients:

- deposit products (including basic deposit and payment products other than basic deposit products)
- debentures, stocks or bonds issued or proposed to be issued by a government
- investment life and life risk insurance products (including any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds)
- interest in managed investment schemes (including investor directed portfolio services)
- securities
- superannuation
- margin lending and
- derivatives.

Vinarc can advise you on:

- financial planning
- investment
- superannuation
- retirement planning
- estate planning
- cash management trusts
- gearing strategies
- social security
- wealth creation
- debt management and
- life and disability insurance.

Your adviser may only be authorised to advise you on some of these areas. Please check your adviser's profile for specific details.

Vinarc advisers can recommend investments,

superannuation and risk products on our approved product list (APL). The products on this list are analysed and reviewed regularly and must constantly meet Vinarc's stringent requirements.

Vinarc also utilises leading research houses to assist with this analysis. If you have an existing superannuation fund that is not on the APL, we can still advise you on your existing fund.

How will my adviser work with me?

To ensure we understand your financial needs and recommend the most appropriate solutions, your Vinarc adviser will:

1. Provide you with this guide and agree on how we will work with you.
2. Obtain relevant information about your financial needs and objectives and your current financial affairs.
3. Research the solutions that will best satisfy those needs and objectives.
4. If there is consideration of any existing credit product and/or strategies, we will provide you with an assessment of whether your existing product or strategy is unsuitable. Considerations would include (amongst other things) your capacity to repay and compatibility with your objectives.
5. Recommend products approved by Vinarc.
6. Provide you with a written Statement of Advice (SoA) which explains these recommendations, the key issues involved and how we are paid for advising you.
7. Discuss the SoA with you and vary the recommendations if necessary.
8. Provide you with a Product Disclosure Statement (PDS) for each product we recommend in the SoA. The PDS contains information about the product.
9. Implement the agreed recommendations.
10. Review your financial situations agreed.

If you are an existing Vinarc client, you may have been through this process. If you receive further advice from us, you will receive either a Record of Advice (RoA) or a SoA if the advice is in relation to a

different type of financial product or your circumstances have changed.

How do I communicate with Vinarc?

You can give us instructions or information verbally or in writing. In some cases, we will need your instructions in writing. We will let you know what information we need or what forms we need you to complete and sign.

What do I need to do?

To help us to advise you appropriately and to protect you throughout our relationship, please:

- Provide accurate information about your personal circumstances.
- Update us on any changes to this information.
- Do not make any payments for investments, contracts or fees "made payable" to your adviser.
- Do not sign blank forms.

How do I pay for Vinarc's advice?

The method and the specific amount you will pay for Vinarc's advice will be explained in your SoA, the recommended product's PDS, and your adviser will discuss these with you.

For investment advice, you pay for Vinarc's advice in one or a combination of these four ways: upfront, ongoing, adviser service fee, or fee for service.

1. **Upfront** – Vinarc may be paid by an assets based % fee upfront (between 0% and 5%) through company issuing the product. This is taken from the amount you invest. For example, asset fee on a \$50,000 investment is between \$0 and \$2,500.
2. **Ongoing** – Vinarc may be paid an ongoing asset fee (between 0% and 2%) through the company issuing the product. This may be included in the cost of the product you invest. For example, asset fee on a \$50,000 investment is between \$0 and \$1,000 per annum.
3. **Adviser service fee** – Vinarc may be paid a fee (between 0% and 4%) by the company issuing the product. This is usually taken directly from the amount you invest. For example, fees on a \$50,000 investment is between \$0 and \$2,000.
4. **Fee for service** – You agree upfront with your adviser to pay for the services you receive either on an hourly rate, a set fee per year, a percentage of funds invested, or a combination of these.

For life risk insurance advice, Vinarc may be paid in one of these three ways: upfront, hybrid, or level. The way the adviser is paid does not affect your premiums.

1. **Hybrid** – Vinarc may be paid a commission of up to 77% of the first year's premium and 30% of ongoing year's premiums. For example, commission on a premium of \$1,000 is up to \$770 upfront and up to \$300 each year thereafter.
2. **Level** – Vinarc may be paid a commission of up to 40% of both the first year's premium and ongoing year's premiums. For example, commission on a premium of \$1,000 is up to \$400 per year from inception.

Vinarc may pass between 96% and 100% of these commissions and fees to the adviser. For example, where Vinarc receives \$1,000, your adviser may receive between \$960 to \$1,000. Details of these payments will be disclosed in the SOA you receive.

The basis and amount of all commissions and fees for service will be set out in the SOA and explained by your adviser.

What arrangements does Vinarc have with 3rd parties?

Some businesses may from time to time provide a payment in lieu of work completed to help ensure the smooth transition of clients to receive beneficial services. Our advisers will provide briefs, create summaries and help the 3rd parties with basic admin to save time, in return for a 'one off fee' of up to 30% of the remuneration from the 3rd party paid to Vinarc then to the relevant Corporate Authorised Representative your adviser is working with.

If this occurs the SOA will outline all payments that flow to Vinarc.

Vinarc has a professional AIA and their Health Insurance product and in turn will pay the adviser who referred you a 'one off payment' up to 20% of the first year's premium at no further cost to you. If this is applicable to you the adviser will disclose details of this in your SOA.

Some Product providers at times may also provide other benefits to Vinarc and Vinarc advisers including but not limited to:

- Entertainment such as lunches or sporting events etc
- Sponsorship of Vinarc Professional Development Events

These benefits are outlined in our Alternative Forms of Remuneration Register. Please ask

your Vinarc adviser if you would like to see this Register or learn more about the Financial Planning Associations Alternative Remuneration Code of Practice.

How does Vinarc deal with my personal information?

Vinarc holds personal information about you. We hold this information in accordance with our obligations under the Privacy Act. The information has been and will continue to be collected by us for the purposes of providing you with the financial services outlined in this guide.

Any personal information you give us will be maintained in a secure personal file. Please ask us if you want a copy of anything in this file, and we'll give it to you free of charge.

You may request a copy of any advice records we keep. Any request for a copy of an advice document must be made within 7 years of the advice being provided.

We are required by the Corporations Act and the ASIC, to ask for this information about you for the purpose of providing you with our services.

If you do not provide us with the information requested by us, we may not be able to provide you with the services you require.

We may be required from time to time to disclose information about you to representatives of Vinarc and to other professionals, insurance providers, superannuation trustees and product issuers in order to provide our services and arrange for the issue of financial products.

In the event that the adviser proposes to sell their business we may disclose your personal

information to potential purchasers for the purpose of them conducting due diligence investigations any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed to them. In the event that a sale of the adviser's business is affected, we may transfer your personal information to the purchaser of the business. You will be advised if a transfer such as this takes place.

What do I do if I have concerns about Vinarc's services?

You have the right to express your concerns about Vinarc's services either verbally or in writing. Vinarc has established procedures to consider and deal with your concerns.

First, please contact your Vinarc adviser to discuss your concerns. If your adviser has not satisfactorily resolved your concerns or if you do not wish to contact your adviser, please contact:

Executive Manager Governance
Vinarc
Level 33, 264 George St
Sydney NSW 2000

Telephone: 0408155140

If we have not been able to satisfactorily resolve your concerns, you may lodge a complaint with:

Australian Financial Complaints Authority:

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

Time limits may apply to complain for AFCA so you should act promptly or otherwise consult the AFCA websites to find out of or when the time limit relevant to your circumstances expires.



Level 33, 264 George St

Sydney NSW 2000

0408155140

Vinarc Pty Ltd

Privacy Policy

Release Date | February 2018

DISCLAIMER

The information presented in this document is the interpretation of Vinarc Pty Ltd in relation to the Privacy Act 1988 and the Australian Privacy Principles. Licensees should review and make adjustments relevant to their business. Should you require specialist advice in relation to this area you should contact a lawyer or other suitably qualified professional.

Vinarc Pty Ltd Privacy Policy

At Vinarc Pty Ltd (The Licensee), we understand that the privacy of your information is important to you and we respect the confidentiality of the information that you provide to us. Protecting your information is an important part of maintaining trust between us and our clients and by handling information in a secure manner we build strong business relationships.

This document provides information and details about how we manage the personal information that we collect, hold, use and disclose about individuals.

The Privacy Policy applies to all organisations within the Licensee and all subsidiary companies which are set out at the end of this policy. We are bound by the Privacy Act and we manage and protect your personal information in accordance with the Australian Privacy Principles.

Why we collect and use personal information

We collect, hold, use and disclose personal information so we can provide you with financial and credit products, advice and service 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
- 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

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

What personal information we collect

We ask people for a range of personal information to assist us in providing relevant products and services. The information we collect could include (but is not limited to) your name, date of birth, contact details, financial information, employment details, residency and citizenship status. We may also collect the personal information of your family members where it is relevant to the advice being provided.

We may also collect sensitive information about your medical history and their health and lifestyle to provide financial advice about life insurance products.

In most instances, we collect personal information directly from that person when they:

- complete a financial product or credit product application form,
- complete an identification form,
- complete data collection documentation,
- interact with an online interactive tool, such as a budget planner,
- provide documentation to us, or
- when you communicate with us in person, over the telephone, fax, email, internet or by using other electronic devices.

Situations where we collect personal information from other people and organisations include (but are not limited to):

- a financial adviser,
- a mortgage broker or other credit representative,
- other professionals who act on your behalf, such as a lawyer or accountant,
- health professionals,
- other organisations, who jointly with us, provide products or services to you, and
- social media and publicly available sites.

It's your choice whether to provide your personal information. You have the right to not to provide personal information, including about your identity. However, in this case, your adviser will warn you about the possible consequences and how this may impact on the quality of the advice provided. Your adviser may also decline to provide advice if they feel they have insufficient information to proceed. In some instances, we will decline to provide services or advice if we feel we have insufficient information for the scope of the service or advice requested.

Further, in some circumstances the law requires us to obtain and verify details of photographic and non-photographic identification documents.

Cookies and other web technologies we use

Some personal information may be collected automatically, without your knowledge, whilst navigating through and interacting with the content of our websites. The electronic methods of collection we use include cookies, log files and web beacons.

Cookies are a small text or pixel file stored on your device that records information about your visit to our websites. We use cookies to improve your website experience, to serve you with relevant information and to manage your access to certain parts of our websites. You can choose if and how a cookie will be accepted by changing your browser settings; but please be aware that this may affect your access to some parts of our websites.

Web beacons are small pixel files that help us better manage content on our websites by allowing us to understand usage patterns, fix issues, and improve the products and services offered to you on our websites. Log files contain information about the devices and browsers used to access our websites and help us to diagnose problems, analyse trends and administer the site or mobile application.

The information we collect by these electronic means is generally not stored for long – they are temporary records – and can include device-specific data or log data such as your IP address, device screen size, device type, browser information, referring domain, pages visited, the date and time website pages were visited, and geographic location (country only).

Accessing and updating personal information

You can request access to personal information we hold. There may be a cost involved with locating, copying or sending you the information you request. The cost will be discussed and agreed with you at the time.

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 provide an explanation as to why.

We will deal with requests for access to your personal information as soon as possible and aim to respond within 30 days. The time we require will depend on the type of information requested.

We will update your personal information if you contact us. In most cases, you can update your personal information over the phone, by contacting your adviser or broker or electronically.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may only be able to provide you with limited information or services. In many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

Who we share personal information with

From time to time we may share your personal information with other entities both within and outside of the Licensee. This will vary according to the product or service involved, but could include:

- any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney
- financial product and service providers, including financial planning software providers and paraplanners
- for corporate superannuation members, your employer or your employer's financial adviser
- lenders and other credit providers
- other organisations within the Licensee including related bodies corporate and advice firms we have authorised
- medical practitioners and health service providers, such as pathology services
- companies involved in the payments system including financial institutions, merchants and payment organisations
- organisations who assist us with certain business functions, such as auditors, compliance consultants, direct marketing, debt recovery and information and communication technology support
- our solicitors, our insurers, courts, tribunals and dispute resolution organisations
- other organisations who provide us with products and services so that they may provide their products and services to you or contact you on our behalf, and/or
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information to (for example, law enforcement agencies, Australian and international government and regulatory authorities).

We may also disclose your information to a third party where you have given your consent or where you would reasonably expect us to disclose your information to that third party.

We may also disclose the personal information we hold about our financial advisers to professional organisations, companies and consultants that we work with.

The only circumstances in which we would collect, use or disclose your government related identifiers is where we are required or authorised by law to do so. For example, we may be required to disclose your Tax File Number (TFN) to the Australian Taxation Office, a superannuation or retirement income product provider. Likewise, we may need to disclose your Medicare number to Centrelink in order to assess your social security eligibility. Drivers licence numbers and passport numbers may also be collected when we are required to verify your identity.

Personal information collected may also be used for direct marketing purposes to promote events, products or services that may be of relevance to you. Please contact us should you wish not to receive direct marketing.

Disclosure of personal information overseas

We may disclose your personal information to service providers who operate outside Australia including the same purposes as in 'Why do we collect personal information?'

The most common example of when we share your personal information overseas is when we work with overseas service providers who prepare financial advice documents.

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

Your adviser may enter into their own outsourcing arrangements to countries other than those detailed above. If so, your adviser will disclose these arrangements separately to you. All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act.

Personal information is generally hosted on servers located in Australia. If you access our services from outside Australia, you consent to the transfer of your personal information to Australia, a jurisdiction that may not provide the same high level of protection we apply in Australia.

How we protect personal information

We strive to ensure that the personal information that you provide to us is stored safely and securely. We take a number of precautions to protect the personal information we hold about you from misuse, interference and loss, and from unauthorised access, modification or disclosure.

We have a range of practices and policies in place to protect personal information we hold, including:

- educating our staff and representatives about how to protect your personal information and updating them about cyber security developments, threats and scams,
- requiring our staff and representatives to use passwords when accessing our systems,
- where appropriate, using strict confidentiality arrangements restricting third parties' use or disclosure of personal information for any unauthorised purposes,
- employing physical and electronic means, including access controls (as required) to protect against unauthorised access to buildings,
- employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons, malware and viruses from entering our systems,
- some of the systems we use are on dedicated secure networks or transmit electronic data via encryption, and
- providing secure storage for physical records and securing paper files in locked cabinets and physical access restrictions.

Where personal information is no longer required, we take steps to de-identify or destroy the information in a secure manner.

Complaints about privacy

If you have any queries or are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint, please contact the Privacy Officer on the information below:

Mail Level 33, 264 George St, Sydney NSW 2000
Phone 0408155140
Email admin@vinarc.com.au

We will acknowledge receipt of a complaint immediately, however, where this is not possible, acknowledgement will be made as soon as practicable. We will then investigate the complaint and respond to you within 45 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution.

If you are not fully satisfied with our response, you can contact an external body. In cases of privacy related complaints, this is generally the Office of the Australian Information Commissioner (OAIC).

The contact details for OAIC are:

Mail GPO box 5218 Sydney NSW 2001
Phone 1300 363 992
Email enquiries@oaic.gov.au
Online www.oaic.gov.au

For all complaints or concerns you can contact the Australian Financial Complaints Authority:

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

About this Policy

We may amend or update our Privacy Policy as required by law or as our business processes or technology changes. We will post the updated policy on our website – www.strictlysuper.com.au. We encourage you to check our website from time to time to view our current policy or contact us for a printed copy.

The Privacy Policy applies to the following organisations which are all part of the Licensees Group:

- Noall & Co ABN 17054967716
- Your Wealth Hub ABN 13605324169
- Strictly Super ABN 39102987833
- Your Wealth Hub Advice ABN 85630980433
- Wilson CA Private Wealth ABN 93633174311
- Peak Wealth Management ABN 67629873552
- Make Work Optional ABN 74636546784
- Financially Sound ABN 61268055208