



Financial Services Guide & Privacy Policy

This Financial Services Guide & Privacy Policy is designed to clarify who we are and what we do, and help you decide whether to use our services. It is important you understand this Financial Services Guide & Privacy Policy as it is a legal document. If any part of this document is not clear, please speak to your financial adviser.

Version 5.2 1 September 2020



Section 1: Financial Services Guide

About the Guide

This Financial Services Guide ('FSG' or 'The Guide') Version 5.2 issued on 1 September 2020 has been authorised for distribution by the authorising licensee:

3CSG Pty Ltd (3CSG)
ABN: 79 603 719 099
Australian Financial Services License (AFSL) No. 472666
Registered Office: 31 Murray Street, Bowen Hills QLD 4006
Postal Address: PO Box 2577, Fortitude Valley BC QLD 4006
E: mail@logiro.com
W: www.logiro.com

This Guide provides you with important information about 3CSG Pty Ltd ('3CSG' or 'Licensee'), and its Authorised Representatives, who will provide you with the financial services described in the guide. It is designed to help you evaluate and make an informed decision about whether to use the financial services described in the Guide. We suggest you retain this Guide for your future reference. If any part of this Guide is not clear, please speak to your financial adviser.

This Guide contains important information about:

- the financial services we offer as Authorised Representatives of 3CSG;
- 3CSG as the holder of an AFSL;
- the financial services that 3CSG offers;
- the process we follow to provide financial services;
- 3CSG as the holder of an ACL;
- how we, our associates, and 3CSG are paid;
- any arrangements which may influence our advice to you;
- how we and 3CSG protect your privacy; and
- who to contact if you have a complaint or if you are not satisfied with the services provided.

References in this Guide to 'me', 'I', 'us', 'we' and/or 'our' should be read as either 3CSG or your 'Authorised Representatives' of 3CSG, as the context requires.

This Guide contains the following sections:

- Section 1: Financial Services Guide;
- Section 2: Privacy Statement ;
- Section 3: Are you satisfied?
- Section 4: Privacy Policy
- Section 5: Referral Arrangements

Together, these documents form the complete FSG which we, as Authorised Representatives are required to provide.



Section 1: Financial Services Guide

About 3CSG

3CSG holds an AFSL issued by the Australian Securities and Investments Commission [and is a Professional Partner of the Financial Planning Association of Australia (FPA)].

As an Authorised Representative, we act on behalf of 3CSG when providing the financial services, we are authorised to provide under 3CSG's AFSL.

As the holder of an AFSL, 3CSG is responsible for the financial services we provide to you. 3CSG acts on its own behalf when these financial services are provided to you

Logiro Unchartered Pty Ltd and Aspire SRS Pty Ltd are your Logiro advisers and are representatives of and offer financial services on behalf of 3CSG Pty Ltd.

The Financial Services that the above advisers offer are provided by Logiro Unchartered Pty Ltd, ABN: 32 154 725 747, and/or Aspire SRS Pty Ltd, ABN: 94 111 785 463, both trading as Logiro, corporate authorised representative Nos. 421862 and 283942, respectively.

3CSG Pty Ltd has authorised your Logiro adviser to provide you with this Financial Services Guide.

More information on our advisers, including educational standards, can be found at www.logiro.com.

Who is responsible for those financial services?

In relation to the financial services offered in this FSG, 3CSG, as the holder of an AFSL, does not act on behalf of any other person or licensee. 3CSG is only responsible for the services offered in this FSG and has authorised the distribution of this FSG.

The law requires 3CSG to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by 3CSG and/or its Authorised Representatives. 3CSG has professional indemnity insurance that satisfies these requirements.

3CSG and Logiro are related parties

While 3CSG and Logiro are separate legal entities, they are related. 3CSG and Logiro share the same directors and as such are controlled by the same people. Chris Shiels is a director of, and the Responsible Manager for, 3CSG Pty Ltd; he is also a director of Logiro.

Other related parties

Logiro is a wholly owned subsidiary of AZ Next Generation Advisory (AZNGA). AZNGA is a division of the global Azimut Group of companies. Established in 1989, Azimut is Italy's largest independent asset manager. Azimut entities, including AZ Sestante, issue and manage products that Logiro advisers may recommend. From time to time Logiro may recommend you apply for, acquire, vary or dispose of a financial product issued or managed by a person who is also a member of the Azimut Group. As at the date of this FSG, relevant product issuers and managers whom we recommend include AZ Sestante Ltd (ABN 94 106 888 662, AFSL 284442) (AZ Sestante). Investments in related products are subject to the same fee arrangements and fee disclosures as any other product. Logiro may charge an ongoing adviser service fee for managing strategies related to a related product. These fees are paid by you out of your investment balance and are not fees paid by the product provider or any other person or entity.

What information should you consider before deciding whether to proceed with our recommendations?

If you receive personal financial advice this will be documented in a Statement of Advice (SOA), or in specific circumstances a Record of Advice (ROA), that confirms the discussions you have had with us, the recommendations we are making and the basis for those recommendations. These documents will also explain how those recommendations will work towards achieving your goals, any relevant fees received by us, and any associations with financial product providers.

When a financial product is recommended to you, you will be provided with a Product Disclosure Statement (PDS) or other disclosure document issued by the product provider. Among other things, the PDS contains information about the risks, benefits, features and fees payable in respect of the product. In combination, these documents will help you make an informed decision about whether to proceed with our recommendations.



Section 1: Financial Services Guide

Who provides the financial services described in this FSG?

The financial services described in this FSG are provided by us as Authorised Representatives of 3CSG.

Chris Shiels	Authorised Representative No. 305716
Kellie Treweek	Authorised Representative No. 429280
Garet Shepherdson	Authorised Representative No. 1269512
Logiro Unchartered Pty Ltd	Corporate Authorised Representative No. 421862
Aspire SRS Pty Ltd	Corporate Authorised Representative No. 283942

Who is responsible for those financial services?

As the holder of an AFSL, 3CSG is responsible for the financial services we provide to you. 3CSG acts on its own behalf when these financial services are provided to you. In relation to the financial services offered in this FSG, 3CSG, as the holder of an AFSL, does not act on behalf of any other person or licensee. 3CSG is only responsible for the services offered in the FSG.

The law requires 3CSG to have arrangements in place to compensate certain persons for loss or damage they suffer from certain breaches of the Corporations Act by 3CSG and/or its Authorised Representatives. 3CSG has internal compensation arrangements as well as professional indemnity insurance that satisfy these requirements.

How to contact us

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Office Addresses:

31 Murray Street
Bowen Hills QLD 4006

Suite 12 'Miami Business Centre'
2190 Gold Coast Highway
Miami QLD 4220

Unit 1
8 Denna Street
Maroochydore QLD 4558

Phone:

1800 564 476

Fax:

1300 032 987

Email:

mail@logiro.com

Postal Address:

PO Box 2577
FORTITUDE VALLEY QLD 4006



Section 1: Financial Services Guide

What financial services do we offer?

We are authorised, on behalf of 3CSG to provide financial product advice and to deal in a wide range of products including:

- Cashflow & Budgeting
- Debt Management
- Wealth Accumulation & Investment Strategies
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Pre-Retirement Planning
- Post-Retirement Planning
- Redundancy Planning
- Estate Planning
- Government Benefits
- Aged Care

What products are available?

A range of financial products offered by many leading financial product providers are available to our advisers when they provide personal advice.

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Facilities
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Superannuation
- Retirement Savings Accounts
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Derivatives
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities



Section 1: Financial Services Guide

How do we ensure that our advice suits your needs and objectives?

To ensure that we provide personal advice that is appropriate, we firstly need to understand your financial situation, personal financial objectives and needs. We will follow a step-by-step process as outlined below:

1. We will meet with you for an initial consultation. During this meeting we will discuss your expectations and provide you with details of the services that we can offer. The cost of this meeting is \$275 (including GST).
2. We will collect all the information that we need from you, including your personal financial situation, financial objectives and needs. If you do not wish to provide the information we require, we will advise you of the possible consequences of not disclosing all of this information and the impact on the recommendations given. This may include not being able to provide advice on the subject matter that you request.
3. We will help you identify your goals and discuss your attitude towards investment risk.
4. We may consider strategies and areas such as income, social security, insurance, cash and estate planning requirements. Where we recommend a financial product, we will also conduct a reasonable investigation of the financial products that may be suitable to implement the strategies as part of the recommendations. Based on these considerations and others, we will prepare and present you with a written Statement of Advice (SOA), or in some cases depending on the circumstances a Record of Advice (ROA). Where we recommend financial products, we will provide you with a PDS or other disclosure document containing information about each product recommended, to help you make an informed decision about whether to invest in or acquire that product.
5. We will discuss our recommendations with you, make any changes you require and gain your agreement to implement those recommendations.
6. If you agree, we will then implement those recommendations.
7. We will periodically meet with you to review your financial circumstances if we agree to an ongoing service arrangement which includes a regular review component. If an ongoing service arrangement is entered into, this will be documented in your Ongoing Advice Service Arrangement Letter and/or SOA. Where you have entered into an ongoing fee arrangement after 1 July 2013, we will renew your agreement with you annually.

We will also explain to you any significant risks of the financial products and strategies which we recommend to you. If you are unclear of the risks, do not hesitate to question us further.

In certain circumstances, we may not provide you with personal advice via SOA or ROA as outlined above. These circumstances may include:

1. Where we provide you with only general advice, such as through seminars and newsletters;
2. Further advice or verbal advice – if you previously received advice recorded in an SOA, any further personal advice provided by us may be recorded in an ROA. We will not necessarily provide you with a copy of the ROA unless you request it (see below).

What documents do you get if we provide further advice?

Where a further review is conducted, and personal advice is provided, in some circumstances we are not required to provide you with an SOA for this further advice. Where this is the case, if you have not already been provided with an ROA, you may request a copy of the ROA from us by contacting us for a period of seven years from when the further advice was first provided to you. In all other circumstances we will provide you with an SOA.

How can you instruct us?

You may specify how you would like to give us instructions, for example, by phone, fax or email using any of the contact details set out in page 4 of this Guide. Alternatively, you may provide instructions to us in person. Where instructions are provided by telephone, these must be confirmed in writing.



Section 1: Financial Services Guide

How are we paid for our services?

If the fees, commissions or other benefits are not calculable at the time we provide personal advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after.

We (Logiro) and 3CSG may receive:

- Fees paid by clients;
- Commissions paid by product providers;
- Other payments by product providers; and
- Other benefits.

All fees and commissions are payable (as directed by your Authorised Representative) to 3CSG. We (Logiro) may receive up to 100% of any fees and commissions received. Details of any fees, commissions or other benefits that we, 3CSG or other associated persons are entitled to receive if you implement our recommendations in relation to a specific financial product, will be disclosed to you in your SOA or ROA when personal advice is given. Details of other benefits will only be disclosed if they are reasonably capable of influencing us in providing the advice. This disclosure will be in dollar terms, or where this is not possible, in percentage terms.

Service fees

We will discuss and agree our fee structure with you before we provide you with services. The types of fees you can be charged are listed below. Full details of all fees and commissions for Financial Services will be provided to you in a Statement of Advice (SOA), or Record of Advice (ROA) and Product Disclosure Statements at the time of receiving any recommendation. You may be charged a combination, or part of, any of these fees.

Initial meeting fees

We charge an initial meeting fee of \$275.

Fees for advice

We may charge fees for the preparation, presentation and implementation of our advice. These fees will be based on your individual circumstances, the complexity involved in your situation and the time it takes to prepare personal financial advice for you. These fees may be as little as \$0 and as high as \$5,500 including GST. From time to time there may be reasons we need to charge fees outside of this range. In any case, we will discuss these fees with you and gain your agreement on the fees before we provide you with advice.

Ongoing advice fees

We may charge a fee to provide ongoing services. Everything about this fee is negotiable. By this we mean the total fee, how the fee is calculated, and how the fee is paid. We may charge a flat dollar fee, a fee based on a percentage of the funds under our advice, a fee based on the time taken to perform the services, or a combination of these.

There are no fees payable until you enter into an ongoing fee arrangement with us. The fee arrangement is a component of our advice documents (SOA or ROA). You may request a different fee arrangement at any time. While we will always try to accommodate your requests, we also reserve the right to refuse the request or terminate our services.

Our three most common fee arrangements are noted below (the ranges are examples only and actual fees may fall outside of these ranges):

- Flat fee: we negotiate a flat dollar fee for the services we provide. This may be as low as \$1,500 per year, or as high as \$100,000 per year.
- Percentage fee: we negotiate a percentage fee based on the funds we manage for you. This may be as low as 0.55% or as high as 1.65%. For example, we manage \$200,000 in your superannuation account at a fee rate of 1.1% including GST, therefore the fee you pay is $\$200,000 \times 1.1\% = \$2,200$.
- Hybrid fee: we negotiate a flat fee for access to our services plus a percentage fee based on the funds we manage for you. For example, \$1,500 for access to services plus 0.3% of funds under management. If you have \$200,000 invested = $\$1,750 + (\$200,000 \times 0.3\%) = \$2,350$.

Fees for other services

We may charge a fee for the provision of other services. Where appropriate will provide you with a fixed price quote for these services, alternatively we will quote an hourly rate when the scope of services is unknown. We will not commence the provision of services until the quote has been accepted and a minimum 50% deposit has been paid.



Section 1: Financial Services Guide

Payment methods

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods. Where it is debited from your investments it is normally referred to as the Adviser Service Fee.

In most instances you will be able to select the method of payment that suits you best. We will discuss and agree the method of payment with you before we provide you with services.

Commissions

If you take out a financial product through us, 3CSG may receive payments in the form of initial commissions and/or ongoing commissions from the financial product providers. These fees or commissions are included in the fees, premiums and interest rate (in the case of margin loans) you pay for the product. This is not an additional cost to you. We may agree to rebate some or all of these. The commission payable for different classes of financial products include the following:

Investment products

For investment products, including superannuation and annuities, commissions are generally deducted from the funds you invest. Commissions on investment products may only be payable in certain circumstances where an arrangement exists as at 1 July 2013. Where you have acquired an investment product before 1 July 2014, commissions may be payable where 3CSG has an existing arrangement with the product issuer prior to 1 July 2013.

3CSG may receive between 0% and 4.4% of your initial investment as initial commissions from product providers whose products are recommended to you. 3CSG may also receive ongoing commissions from the management fees of the product providers.

Ongoing commissions range between 0% and 0.55% p.a. of your investment balance. 3CSG may pass up to 100% of these commissions to Logiro.

Example: We recommended you invest \$10,000 in an investment product before 1 July 2014. The applicable initial commission is 1% and ongoing commissions are 1% p.a. 3CSG may receive initial commission of \$100 and may pass up to \$100 of that to us. Assuming the investment amount stays the same, each year 3CSG will receive ongoing commission of \$100 and may pass up to \$100 to us.

Life Insurance Products

Initial and ongoing commissions from insurance providers may be received by 3CSG Pty Ltd. These commissions are paid to 3CSG Pty Ltd by the company that issues the product that we recommend to you and they are included in what you pay for the product. The commissions vary and are based on the policy cost, which is the sum of the premiums you pay and may include other fees related to the product.

The initial commission is paid in the first year by the product issuer to 3CSG Pty Ltd. Ongoing commissions are payments paid by product issuers to 3CSG Pty Ltd in the years after the first year. These commissions may be passed onto us.

If you initiate an increase to your cover, 3CSG Pty Ltd may receive an initial commission and ongoing commissions on the annual increase to your policy cost. The ongoing commission on a client-initiated increase is only paid in respect of the period that starts from the first anniversary of the increase.

If the initial commission is equal to the ongoing commissions (as a percentage of your policy cost), 3CSG Pty Ltd may receive up to 33% (excl. GST) of your annual policy cost. If the initial commission is higher than the ongoing commissions, the maximum commission that 3CSG Pty Ltd may receive is set out in the table below:

Date a new product is issued	Initial commission (% of annual policy cost or increase excl. GST)	Ongoing commission pa (% of annual policy cost or increase excl. GST)
Before 1 January 2018 or before 1 April 2018 when the application was received prior to 1 January 2018	0 - 140%	0 - 38.5%
1 January 2018 - 31 December 2018*	0 - 80%	0 - 20%
1 January 2019 - 31 December 2019*	0 - 70%	0 - 20%
From 1 January 2020*	0 - 60%	0 - 20%



Section 1: Financial Services Guide

* 3CSG Pty Ltd may receive the pre-1 January 2018 commission rates above from the product issuer if:

- > your policy was issued before 1 January 2018 and you exercise an option or apply for additional cover under your policy after 1 January 2018; or
- > your policy was issued before 1 January 2018 and is replaced after 1 January 2018 to correct an administrative error.

Example

We recommend an insurance product to you and it is applied for and issued on 2 February 2018. The annual policy cost is \$450. 3CSG Pty Ltd may receive up to \$360 (80% excl. GST) as an initial commission and may pass up to \$360 to us. Assuming the policy cost stays the same each year, 3CSG may receive up to \$90 pa (20% excl. GST) as an ongoing commission and may pass up to \$90 pa to us.

From 2 April 2018, you decide to increase your insurance cover. The cost of this increased cover is \$100. The initial commission payable to 3CSG in respect of this increase will be \$80 (80% excl. GST) as the increase has occurred in 2018. The ongoing commission payable to 3CSG in respect of this increased policy cost will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2019). These commissions may be passed onto us.

From 2 April 2020, you decide to increase your insurance cover again. The cost of this increased cover is \$100. The initial commission payable to 3CSG in respect of this increase will be \$60 (60% excl. GST). The ongoing commission payable to 3CSG in respect of this increase will be \$20 pa (20% excl. GST), payable in respect of the period starting from the first anniversary of the date on which you increased your insurance cover (i.e. 2 April 2021). These commissions may be passed onto us.

You'll find details of how your insurance policy cost is calculated in the relevant PDS that we provide you. Where personal advice is provided to you, you'll also find details of the commission that 3CSG and we are entitled to receive if you decide to purchase a life insurance product, in your SOA or ROA.

In addition, 3CSG may receive benefits as part of the Partner Programs in the form of education, training and other support and resources to assist in the delivery of life insurance and investment product advice. Participants in the Partner Programs may pay a fee to 3CSG. Participants may be given the opportunity to provide training about their products. The total amount of fees, or the fees that may be paid by each product provider, will depend upon the commercial arrangements that may be negotiated from time to time between 3CSG and each product provider. These payments will not change the amount of the product cost payable by you.

Other benefits

From time to time we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g. training or sponsorship to attend conferences). We maintain a register detailing any benefit that we receive which is valued at between \$100 and \$300 and other benefits that relate to information technology software or support provided by a product issuer or that relate to educational and training purposes.

A copy of the register is available on request for a minimal administration charge.

How is your adviser paid?

Your Logiro adviser is paid a salary and may also receive a performance bonus based on certain criteria. The performance bonus is based on a balanced score card of client service, individual effort, and business goals. The performance bonus is designed to enhance service levels and does not influence the advice, or any recommendations made.

Entities related to Chris Shiels own shares in Logiro and as such Chris Shiels receives a benefit from any profits generated.



Section 2: Privacy Statement

Why we collect your personal information

We collect personal information, including sensitive information (e.g. health information), from you to provide you with services including financial advice.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to the particular products or services provided, and help us run our business.

If you do not provide all the information we request, we may no longer be able to provide a product or service, including financial advice, to you.

Collecting and disclosing your personal information

We may disclose your personal information to other members of our organisation, anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us with our business.

We may disclose your personal information to anyone we engage to do something on our behalf such as a service provider, and other organisations that assist us without business.

We may also disclose your personal information to third parties such as complaints body to whom a complaint relating to a product or service is referred, your past and present employers, any party acquiring an interest in our business and anyone acting on your behalf.

Disclosing personal information to your past and present employers may be performed for the efficient provision of our services. This includes but is not limited to – to provide an employer with superannuation account details; to assist with employer superannuation contribution processes; to prove to an employer that we act on your behalf; to assist you in reconciling payments received from a past or present employer; to gather data on past or present employer sponsored superannuation accounts and/or insurance policies.

We may also collect from the parties listed above any personal information they may hold about you which relates to our provision of financial advice.

We may disclose your personal information to an entity which is located outside Australia. Details of the countries where the overseas recipients are likely to be located are in our privacy statement.

As a provider of financial services, we have obligations to disclose some personal information to government agencies and regulators in Australia, and in some cases offshore. We are not able to ensure that foreign government agencies or regulators will comply with Australian privacy laws, although they may have their own privacy laws. By using our products or services, you consent these disclosures.

Logiro and 3CSG are also required, pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (AML/CTF Act) and its corresponding rules and regulations to implement certain client identification processes.

3 Logiro and 3CSG may be required to obtain information about you at the time of providing financial services to you, and from time to time thereafter in order to meet our legal obligations. We have certain reporting obligations pursuant to the AML/CTF Act and information obtained from or about you may be provided to external third parties and regulators in accordance with the requirements imposed on us.

Other important information

We are required or authorised to collect personal information from you by certain laws. Details of these laws are in our privacy policy which we will update from time to time.

Our privacy policy is available at www.logiro.com/Privacy or by calling us; It covers:

- How you can access the personal information we hold about you and ask for it to be corrected;
- How you may complain about a breach of the Privacy Act 1988 (Cth), or a registered privacy code and how we will deal with your complaint; and
- How we collect, hold, use and disclose your personal information in more detail.

Where you have provided information about another individual, you must make them aware of that fact and the contents of this privacy statement.

We will use your personal information to contact you or send you information about other products and services offered by us or our preferred suppliers. If you do not wish to receive marketing communications from us, please contact us.



Section 3: Are you Satisfied?

Your confidence in our advice

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly. Both we and 3CSG endeavour to provide you with quality financial advice. If you have a complaint or concern about the service provided to you, we encourage you to take the following steps:

1. Contact us first about your concern. You can do so by speaking to your adviser, or you can contact 3CSG by:

Email

With the subject line 'Notice of Complaint'

mail@logiro.com

Writing to:

Please address the envelope 'Notice of Complaint' and send it to:

CEO
3CSG Pty Ltd
PO Box 2577
FORTITUDE VALLEY QLD 4006

2. If an issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

Writing to:

AFCA
GPO Box 3
Melbourne VIC 3001

Email:

info@afca.org.au

Website:

www.afca.org.au

Phone:

1800 931 678 (free call)

3. The Australian Securities & Investments Commission (ASIC) is Australia's corporate, markets and financial services regulator. ASIC contributes to maintaining Australia's economic reputation by ensuring that Australia's financial markets are fair and transparent and is supported by informed investors and consumers alike. ASIC seeks to protect consumers against misleading or deceptive and unconscionable conduct affecting all financial products and services. You may contact ASIC by:

Writing to:

Australian Securities & Investments Commission
GPO Box 9827
Your Capital City
Or

PO Box 4000
Gippsland Mail Centre
Victoria 3841

Website:

www.asic.gov.au

Phone:

1300 300 630



Section 4: Privacy Policy

Introduction

This document is the Privacy Policy for Logiro Unchartered Pty Ltd [ACN 154 725 747] and Aspire SRS Pty Ltd [ACN 111 785 463] (referred to as Logiro, **we, our, us**) and 3CSG Pty Ltd [603 719 099] who are all bound by the Commonwealth Privacy Act 1988 (**Privacy Act**), including the Australian Privacy Principles (**APPs**). Each entity recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by Logiro must abide by this Policy and Collection Statement. Logiro makes this Policy and Collection Statement available free of charge and can be downloaded from its website logiro.com

In this Policy and Collection Statement:

- **Disclosure** of information means providing information to persons outside of Logiro;
- **Personal information** means information or an opinion relating to an individual, which can be used to identify that individual;
- **Privacy Officer** means the contact person within Logiro for questions or complaints regarding Logiro's handling of personal information;
- **Sensitive information** is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information; and
- **Use** of information means use of information within Logiro.

This policy will be reviewed at least annually.

What kind of personal information do we collect and hold?

We may collect and hold a range of personal information about you to provide you with our services, including:

- name;
- date of birth;
- gender;
- address;
- phone numbers;
- email addresses;
- tax file number
- occupation;
- bank account details;
- copies of identification such as drivers' licence and/or passport;
- details of related trusts and companies which are relevant to your personal financial advice;
- your personal health details including previous insurance claims history;
- financial information, including:
 - details of assets, liabilities, income, expenses;
 - details of investments including superannuation;
 - details of insurance policies;
 - estate planning details;
 - taxation information.



Section 4: Privacy Policy

How we collect personal information

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms and other interactions with you in the course of providing you with our products and services, including when you visit our website, use a mobile app from us, call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers and marketing agencies. If so, we will take reasonable steps to ensure that you are made aware of this Policy and Collection Statement. We may also use third parties to analyse traffic at our website, which may involve the use of cookies. Information collected through such analysis is anonymous.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

We do not give you the option of dealing with them anonymously, or under a pseudonym. This is because it is impractical, and in some circumstances illegal, for Logiro to deal with individuals who are not identified.

Unsolicited personal information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

Website collection

We collect personal information from our web site logiro.com when we receive emails and online forms. We may also use third parties to analyse traffic at that web site, which may involve the use of cookies. Information collected through such analysis is anonymous. Our website privacy policy can be accessed by clicking on the Privacy Statement link on our website.

To use our web site, you must consent to our use of cookies. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you and can only be read by a web server in the domain that issued the cookie to you.

Cookies do not contain personal information in themselves but can be used to identify a person when combined with other information. Cookies are small text files which are transferred to your computer's hard drive through your web browser that enables our web site to recognise your browser and capture and remember certain information. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Logiro pages, or register with Logiro site or services, a cookie helps Logiro to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Logiro Web site, the information you previously provided can be retrieved, so you can easily use the Logiro features that you customized.

You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Logiro services or Web sites you visit.



Section 4: Privacy Policy

Who do we collect personal information about?

The personal information we may collect and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and
- other third parties with whom we come into contact.

Why do we collect and hold personal information?

We may use and disclose the information (excluding credit information) we collect about you for the following purposes:

- assist with providing financial advice with regards to wealth management, investment advice, cash flow planning, personal risk and estate planning;
- provide you with our products and services;
- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business.

We may use and disclose your personal information (excluding credit information) for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise or an exemption in the Privacy Act applies.

Who might we disclose personal information to?

We may disclose personal information (excluding credit information) to:

- a related entity of Logiro;
- offshore third-party providers who provide an administration service to Logiro;
- an agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, debt collectors or other advisors;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions such as banks;
- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers; and
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues and will make third parties aware of this Policy and Collection Statement.

We may disclose the following personal information to CRBs, in order to comply with our obligations under the *Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth)* (**AML/CTF obligations**):

- name;
- date of birth; and
- residential address.



Section 4: Privacy Policy

The purpose of disclosing this information is to enable us to verify whether the personal information collected matches the identification information held by the CRB. We may, upon request, provide you with an alternative method of verification, however, any alternative verification method must also comply with the AML/CTF legislation.

Sending information overseas

We may disclose personal information to entities that are located outside Australia in some circumstances.

Logiro employs the services of a third party service provider in the Philippines who provide administration services for Logiro. Australian privacy laws apply to this organisation.

Logiro uses the Dropbox cloud storage system. Portions of your data may be stored through these systems. Dropbox have confirmed that data may be stored in either Australia, Japan or the United States of America. We have attached a link to the Dropbox Privacy Policy for your information: <https://help.dropbox.com/accounts-billing/security>

Logiro uses the Iress client database system Xplan. Portions of your data may be stored through these systems. Iress have confirmed that data is stored in part in either Australia, the United Kingdom, Singapore, Malaysia, Hong Kong, South Africa, New Zealand or Canada. We have attached a link to the Iress Privacy Policy for your information: <https://www.iress.com/resources/legal/privacy-policy/>

Logiro uses the Microsoft Office 365 operating system. Portions of your data may be stored through these systems. Microsoft have confirmed that data is stored in part in Australia and also the United States of America. We have attached a link to the Microsoft Privacy Policy for your information: <https://privacy.microsoft.com/en-ca/privacystatement>

Logiro uses the Zoom Video Communications system. Portions of your data may be stored through these systems. Zoom have confirmed that data is stored in the United States of America. We have attached a link to the Zoom Privacy Policy for your information: <https://zoom.us/privacy>

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Act and the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

Management of personal information

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- separate passwords are required to access the system and our database;
- passwords are routinely checked and updated;
- data ownership is clearly defined;
- we change employees' access capabilities when they are assigned to a new position;
- we remove employees access capabilities immediately when they leave employment;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically;
- data is encrypted during transmission over the network; and
- print reporting of data containing personal information is limited.



Section 4: Privacy Policy

Direct marketing

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

Identifiers

We do not adopt identifiers assigned by the Government (such as driver's licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

How do we keep personal information accurate and up-to-date?

We are committed to ensuring that the personal information it collects, uses and discloses is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

Accessing your personal information

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting the Logiro Privacy Officer. We will provide access within 30 days of the individual's request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

Updates to this policy and collection statement

This Policy and Collection Statement will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

Responsibilities

It is the responsibility of management to inform employees and other relevant third parties about this Policy and Collection Statement. Management must ensure that employees and other relevant third parties are advised of any changes to this Policy and Collection Statement. All new employees are to be provided with timely and appropriate access to this Policy and Collection Statement, and all employees are provided with training in relation to appropriate handling of personal information. Employees or other relevant third parties that do not comply with this Policy and Collection Statement may be subject to disciplinary action.



Section 4: Privacy Policy

Non-compliance and disciplinary actions

Privacy breaches must be reported to management by employees and relevant third parties. Ignorance of this Policy and Collection Statement will not be an acceptable excuse for non-compliance. Employees or other relevant third parties that do not comply with this Policy and Collection Statement may be subject to disciplinary action.

Incidents/complaints handling/making a complaint

We have an effective complaint handling process in place to manage privacy risks and issues.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business.

You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer.

If you have any questions about this Policy and Collection Statement, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

Email

With the subject line 'Notice of Complaint'

mail@logiro.com

Writing to:

Please address the envelope 'Notice of Complaint' and send it to:

CEO

3CSG Pty Ltd

PO Box 2577

FORTITUDE VALLEY QLD 4006

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- telephoning - 1300 363 992
 - writing - Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
 - emailing - enquiries@oaic.gov.au
-

Contractual arrangements with third parties

We ensure that all contractual arrangements with third parties adequately address privacy issues and make third parties aware of this Policy and Collection Statement.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with *the Privacy Act*. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.



Section 4: Privacy Policy

Your rights

This Privacy Policy and Collection Statement contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information; and
- you may ask us to provide an alternative means of identity verification for the purposes of the Anti-Money Laundering and Counter Terrorism Financing Act 2006 (Cth);
- you may complain about a breach of the Privacy Act, including the APPs; and
- we will deal with a privacy complaint.

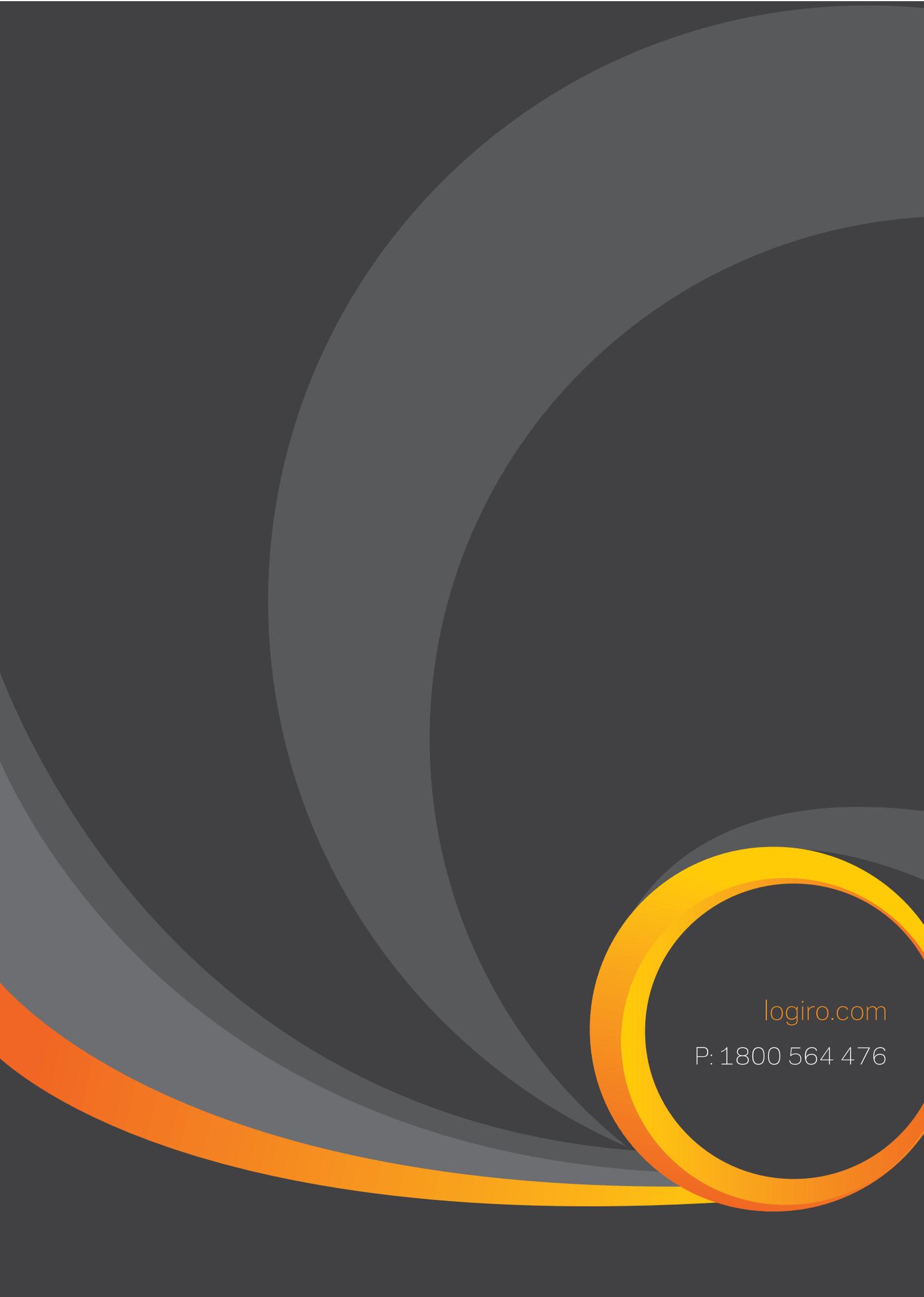


Section 5: Referral Arrangements

Referrals

Your financial adviser may have referral arrangements or associations with other financial services providers such as Estate Planning Specialists and Accountants. Logiro has very specific guidelines with regards to referral agreements which is outlined in full in our Referral Agreement Policy (12 February 2020). Please contact us if you would like a copy of the Policy.

We will not enter into a referral arrangement without your consent. Any fees or commission associated with a referral arrangement will be discussed with you personally and disclosed in our advice documents.



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