



Assurity Financial Group

ABN 27 630 179 903 CAR 1302211

Privacy Policy ("Policy")

This Policy was last updated on 21 February 2025.

Assurity Financial Group 27 630 179 903 ("**we**", "**our**", "**us**" or Damole Pty Ltd is bound by the Australian Privacy Principles (**APPs**) contained in the *Privacy Act 1988 (Cth)* (**Privacy Act**). This Privacy Policy (**Policy**) sets out how we collect, use and share your personal information and how to contact us with any queries or concerns.

While we may update our Policy from time to time, the most recent version of this Policy will always be available the cloud link: [Privacy Policy](#). If we change the Policy in any material way, the updated Policy will be accessible via this link: [Privacy Policy](#). We may also contact you via your contact information on file, for example by email, notification or some other equivalent measure.

If you have any queries, concerns or complaints about how we handle your personal information, please contact our Privacy Officer in the first instance:

Privacy Officer Contact: Michael Lenn
Email: michael@assurityfinancial.com.au

Postal address
Attention: Privacy Officer
Assurity Financial Group
PO Box 4124, East Gosford NSW 2250

Our website contains links to other websites. When you click on a link to another site, you are no longer subject to this Policy.

1. **What types of information do we collect and why?**

In the course of providing our goods and services to you, we collect personal and other information about our clients and how they interact with us and our services. We collect personal information through a number of mechanisms, including:

Collection from you: we collect and store information you provide directly to us (*either in person, by email, by phone, or by any other direct means*) in order to deliver our goods and services. This includes:

- Contact information: such as your name, address, email address, telephone number;

- Personal information: such as date of birth and driver's licence details;
- Financial information: such as your payment information (credit card, bank account, etc);
- Business details: such as your Australian Business Number; and/or

1.1 **Communications:**

When you communicate with us, we collect information such as your contact details (such as email address or phone number). You can elect to not receive communications from us by contacting our Privacy Officer.

We also engage third party services that provide us with information about how you interact with some communications we distribute.

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1.2 **Digital platforms:**

If you access our goods or services by connecting a social media login (such as Facebook or Google) we collect information derived, associated or connected with that platform where permitted by the platform's terms of service. Any information we collect from social media, or other online platforms, is collected in accordance with that platform's terms and conditions.

1.3 **Through other sources:**

Where necessary, we also collect your information from publicly available records. Where appropriate and necessary to do so we collect information from public records such as those maintained by the Australian Securities and Investments Commission, Australian Financial Security Authority, and land titles offices in each state. We may do this where it is unreasonable or impractical to collect this information from you.

If you have previously applied for a position with us we may have received your personal information from third parties such as recruiters or external websites. We use the information we receive to contact you about any potential opportunities or to evaluate your candidacy.

1.4 **Sensitive Information**

We do not collect any information considered to be sensitive information in the Privacy Act. If we need to collect such information, we will always ask your specific consent.

We will only collect this information directly from you or where we have consent to collect the information from a third party.

You have the option of not identifying yourself or interacting with us using a

pseudonym. However, this may not be practicable when engaging our services.

1.5 **How we use your information**

We will only use your information for the purposes for which it was collected (**primary purpose**) or a purpose related, or in the case of sensitive information, a purpose directly related, to that primary purpose if it would be reasonably expected by you or where we have separately obtained your consent.

We use personal information for the primary purpose of providing financial advice and managing investments under an ongoing services agreement.

How we use the information we collect depends, in part, on which services you use, how you use them and any preferences you have communicated to us. If you would like to restrict how your personal information is handled beyond what is outlined in this Policy, please contact our Privacy Officer.

1.6 **Related Party and Group Transfers**

We are part of a larger group of companies licenced by Lenn Licencing Company Pty Ltd and as such we provide your information to other entities within the group of companies. This transfer of information is compliant with s 13B of the Privacy Act.

1.7 **Disclosure of personal information to third parties**

We may disclose your information to third parties who assist us in providing, managing and administering our goods and services. We will also disclose your personal information where such disclosure is required by law.

We disclose your personal information to third parties that:

- Manage investments on behalf of clients, including investment platforms and stock brokers;
- Are Government agencies which may have capacity to provide you with benefits, such as Centrelink;
- Manage our communications with clients, such as occasional marketing information on our behalf;
- Other purposes related to the above.

We do not sell or license your information to third parties.

1.8 **Information you provide about someone else:**

If you provide us with personal information about someone else, you must ensure that you are authorised to disclose that information to us and that,

without us taking any further steps required by applicable privacy laws, we may collect, store, use and disclose such information for the purposes described in this policy.

Where we request you to do so, you must assist us with any requests by the individual to access or update the personal information you have collected from them and provided to us.

If you are someone who does not have a relationship with us but believe that one of our customers has entered your personal information into our servers, you will need to contact that customer for any questions you have about your personal information (including where you want to access, correct, amend, or request that we delete, your personal information).

1.9 **Security and management of personal information**

We will take reasonable steps to protect the personal information we hold from misuse, loss, and unauthorised access, modification or disclosure. We do this by:

- putting in place physical, electronic and procedural safeguards in line with industry standards;
- requiring any third party providers to have acceptable security measures to keep personal information secure;
- limiting access to the information we collect about you;
- imposing confidentiality obligations on our employees;
- only providing access to personal information once proper identification has been given; and

While we take all steps reasonable in the circumstances to protect your information, in the unlikely event a data breach occurs, we will notify you in accordance with our obligations under the Privacy Act.

If we no longer require your personal information, and are not legally required to retain it, we will take reasonable steps to destroy or de-identify the personal information.

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1.10 **Sending information overseas**

We do not disclose or store personal information overseas.

2. **How to access and control your information?**

2.1 **Accessing the information we hold about you**

Under the APPs you may be able to obtain a copy of the personal information that we hold about you. To make a request to access this information please contact us in writing. We will require you to verify your identity and specify what information you wish to access. If eligible, we will grant you access to the information within 30 days.

We may charge a fee to cover the costs of retrieving, reviewing and copying any material requested.

2.2 **Updating your personal information**

We endeavour to ensure that the personal information we hold about you is accurate, complete and up-to-date. Please contact our Privacy Officer if you believe that the information we hold about you requires correction or is out of date. We endeavour to process any request within 30 days and will provide written reasons if your request is rejected, as well as providing details for making a complaint about the refusal if necessary.

For corrections to credit information we will provide, where practicable, written notice of the correction to any entity we have disclosed this information to previously.

3. **Complaints**

If you are concerned that we have not complied with your legal rights or the applicable privacy laws, contact our Privacy Officer in the first instance. Please contact our Privacy Officer with a thorough description of your concerns and a response will be provided within a reasonable period. All complaints must be in writing.

When processing a complaint, we will require you to provide us with information to confirm your identity before processing a request related to information we may hold about you.

We expect our procedures will deal fairly and promptly with your complaint. However, if you remain dissatisfied, you can also contact the Office of the Australian Information Commissioner as follows:

Director of Compliance Office of the
Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001

For more information on privacy see the [Australian Information Commissioner's website](#)

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