

## L2 Financial Pty Ltd (L2) Privacy Statement

### *Our Privacy Arrangements*

#### *Who we are*

The following entities and their respective representatives and/or financial advisers are covered by this privacy policy:

- Propel Financial Advice Pty Ltd, ABN: 43 633 221 002 (Practice) corporate authorised representative number 1276674, or
- Elevate Advice Group Pty Ltd, ABN: 88 632 894 930 (Practice) corporate authorised representative number 1276673,
- As Corporate Authorised Representatives of L2 Financial Pty Ltd (L2), ABN: 83 678 851 020 Australian Financial Services Licence (AFSL) number 700011.

#### **L2 Financial Pty Ltd**

Office address: 29 Rosemead St, North Lakes QLD 4509

Postal address: PO Box 889, North Lakes QLD 4509

#### **Elevate Advice Group Pty Ltd**

Office address: 29 Rosemead St, North Lakes QLD 4509

Postal address: PO Box 889, North Lakes QLD 4509

#### **Propel Financial Advice Pty Ltd**

Office address: Level 1, Suite 11B, 69-79 Attenuata Drive, Mountain Creek QLD 4557

Postal address: PO Box 179, Coolumb Beach QLD 4573

These entities are collectively referred to in this document as L2. Reference to “the licensee” or “we” or “us” or “our” means L2 and its representatives/financial advisers.

### *What is the purpose of this policy?*

This policy provides you with information about:

- The personal information that L2 collects and holds about you
- How and why we handle your information, including how we use, disclose and keep it secure, and
- How you can access your personal information or make a complaint about our handling of your information. Details about how to lodge a privacy complaint are set out below under ‘How you can complain about our handling of your information’.

As a business operating in Australia, we are required to adhere to the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act), which regulate the collection, storage, use, and disclosure of personal and sensitive

information. In addition, they also give individuals the right to access and correct any personal information that we have collected about them.

### *What information do we collect, and why?*

We only collect personal information that is required for us to provide financial services and associated services to you and to satisfy our own legal obligations as the holder of an Australian Financial Services Licence. Typically, we will collect this information directly from you, using a combination of meetings and questionnaires, or via our websites where you send a request that includes personal information. We may receive information about you from third parties, such as your Accountant or other professionals, where you have authorised this in writing.

We do not utilise any standard personal or government identification reference numbers (such as Tax File, Medicare or Centrelink numbers) as identifiers.

The types of information we collect includes:

- Demographic information such as your full name, address, date of birth, nationality, marital status, gender and dependent details,
- Verification of your identity to ensure compliance with AML/CTF laws, such as sighting an original of your drivers' licence, passport or other primary identification, and recording the particulars,
- Financial information including details of your superannuation, investments, liabilities, savings,
- Tax file number (we will require you to separately authorise our collection and use of this),
- Information from publicly available sources and product issuers,
- Sensitive information such as Personal health and medical information (where required) to assess your eligibility for personal risk insurances, and
- Information about your financial needs, goals and objectives.

It is important that you provide us with complete and accurate information, as we use this to develop appropriate strategies and research suitable financial products that suit you. While we will take steps to verify the information you have provided us is complete and accurate, we are not responsible for advice that is defective based upon incomplete or inaccurate information provided by you. Should you choose to give us incomplete or inaccurate information, you will need to consider the appropriateness of our recommendations in the context of your full circumstances.

If you do not provide us information we request, we may not be able to provide services to you.

We will only collect sensitive information with your explicit, affirmative consent, which will be obtained and recorded via a specific written consent declaration prior to or at the time of collection.

We may record client meetings and use an AI tool to produce a transcript and file note of the meeting, and other documents such as internal instructions to follow up agreed actions after the meeting. As with all your information, the transcripts and file notes use secure software and are stored in accordance with our data security measures.

We will always advise you when we intend to record a meeting and seek your explicit consent to do so prior to starting the recording. You may decline to have any meeting recorded if you are not comfortable.

*How will your information be stored?*

We store all personal information in electronic format in facilities we own, or in secure cloud-based storage. Hard copy paper files are stored securely for a limited period (until the hard copies are made electronic) with access restricted only to those staff who require your information to provide our financial services.

We maintain high data security standards to reduce the risk of unauthorised access to your information. However, should a data breach occur, we will contact you to notify you if any of your information was compromised. In certain data breach situations, we will also be required to report to the Office of the Australian Information Commissioner. We are required to assess any suspected breaches within 30 days.

Any original documents given to us will be returned to you after we have scanned them. We are required to retain most financial advice records for a minimum period of seven years. Once this mandatory statutory retention period expires, and provided the personal information is no longer necessary for the provision of our services or any other authorised purpose, we will take reasonable steps to securely destroy or permanently de-identify your information via verified physical destruction, cryptographic erasure, or secure digital overwriting.

*How will we use and disclose your information?*

We only use and disclose your personal information for the purpose of providing you with financial services, to carry on our financial services business compliantly and to seek legal advice about our affairs.

You may make initial inquiries with us on an anonymous basis, but we will not provide services to a person not giving us their real name.

The information we collect may be used to develop an appropriate financial strategy to achieve your short, medium and long-term goals, and determine which financial products (if any) should be acquired or replaced. Our support staff and outsourced contractors will have access to this information as required to assist with the development of your financial strategy. From time to time, secure AI software may be used to create administrative efficiencies, for instance reporting on pending client administration and back office tasks, and creating correspondence following a meeting which has been recorded with your consent.

Where we accept your instruction to acquire a financial product, we will disclose your relevant personal information to the financial product issuer.

We may use your personal information for our billing processes.

We may also disclose your information to other third parties where required to deliver our financial services to you, or as required by law. These parties include issuers of financial products, life risk insurers, outsourced service providers such as paraplanning, administration support, auditors, accountants, or quality assurance. In some instances,

these providers may be based overseas. We currently have outsourcing arrangements in the Philippines, with all data managed locally in Australia.

Overseas recipients may not be subject to Australian privacy laws, and we cannot guarantee that they will comply with the APPS. Where your information is shared with a third party outside Australia, we will take reasonable steps to satisfy ourselves the third party has arrangements to comply with the Australian Privacy Principles.

If we merge with, or are acquired by another business, your details may be transferred to the new entity, who will be assigned the servicing rights for the ongoing management of your financial products and review services. Should this occur, we will always write to you and provide the opportunity to opt out.

### *Websites, Marketing and Social Media*

We may use personal information collected from you for the purpose of providing you with direct marketing material or from social media platforms; however, if you do not wish to receive such information, you can request not to receive it. Simply contact us by any of the methods detailed in this document. There is no cost for this request; however, please allow two weeks for your request to be actioned.

When you visit our website, details may be recorded about your visit, such as time and date, your computer IP address, pages accessed, time spent on the page, and type of browser. If you provide information on a social media platform, including but not limited to LinkedIn, Facebook, Twitter, and Instagram, we may hold, store, and disclose this information for the purposes of marketing or the provision of services to you. This information is used in an anonymous format for statistical purposes and as such cannot identify you individually, unless we have sought permission from you to do so. Where you don't want this to happen, please notify us. Should you log into a client section of our website, we may use cookies to identify who you are while you are logged in for the session. The cookie is unique to that session, and the data within the cookie is encrypted. You must have cookies enabled to be able to use our site.

Our website may contain links to other websites. When visiting these websites, be sure to check the Privacy Policy as we are not responsible for the privacy practices of those other parties. Where you choose to communicate with us by email, we will store your email, name, and address with any other contact or personal details you have provided on our database.

L2 adheres to the Spam Act 2003 (Cth); accordingly, we will:

- Obtain your consent before sending an electronic message to you (this can be express or inferred);
- Provide sender identification (so that you know who sent the message); and
- Provide you with the option to unsubscribe

### *How can you access or correct the information we hold about you?*

We will take reasonable steps to ensure that the personal information we hold about you is accurate, up to date, relevant and complete, including when it is used or disclosed. If you identify inaccuracies with the information we hold, or there are changes to your circumstances, you can contact us to correct or update the information we hold. If we do not agree with your corrections, we may refuse to

update the personal information, in which case we will provide you with a written explanation as to why.

The Privacy Act allows you to seek access to your personal information. To request access, please contact our Privacy Officer on 07 3185 3414 or [contact@l2financial.com.au](mailto:contact@l2financial.com.au). There are certain circumstances however when we may not be required to provide access to this information, in which case a written explanation will be provided.

We will generally provide access or any required correction within 30 days. We do not charge any fees for making an access request or for correcting your information.

### *How can you complain about our handling of your information?*

If you have a complaint about how we have collected, used or stored your personal information, you can direct your complaint to our Complaints Manager on 07 3185 3414, or at L2 Financial Pty Ltd, 29 Rosemead St, North Lakes QLD 4509. We will carefully consider your complaint and expect to respond within 30 days. Alternatively, you may contact the Office of the Australian Information Commissioner by submitting a complaint through their [online form](#), or by contacting them at:

Privacy Complaints  
GPO Box 5288  
Sydney NSW 2001

Phone: 1300 363 992  
Fax: 02 6123 5145.