PRIVACY POLICY

Forwood Planning | ABN 58 556 913 005

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About This Policy

Australian Wealth Holdings Pty Ltd and Forwood Planning (referred to as **"we", "us" or "our"**) is bound by the *Privacy Act 1988* (Cth) (**Privacy Act**), as amended by the *Privacy and Other Legislation Amendment Act 2024* (Cth) (**POLA Act**), and will protect your personal information in accordance with the Australian Privacy Principles (**APPs**). These principles govern how we collect, use, hold and disclose your personal information, and ensure its quality and security.

This Privacy Policy explains how we manage your personal information. We may provide additional details about how we manage your personal information at the time we collect it. An up-to-date version of this policy is available free of charge on our website or by contacting us.

Our Licensee

Forwood Planning and John Forwood are authorised representatives of **Australian Wealth Holdings Pty Ltd** (ABN 72 608 528 427), which holds Australian Financial Services Licence No. **481674** (**AWH**).

AWH can be contacted at:

- **Phone:** 07 3103 3038
- **Email:** admin@austwealth.com
- **Post:** PO Box 1291, New Farm QLD 4005

AWH's Privacy Officer can be contacted in relation to privacy concerns by writing to PO Box 1291, New Farm QLD 4005 or emailing admin@austwealth.com.

What Is Personal Information?

Personal information includes any information or opinion about an identified individual, or an individual who can be reasonably identified from the information. It remains personal information whether or not it is true and whether or not we have kept a record of it.

The information we seek to collect will depend on the products or services we provide to you. If you do not allow us to collect all the information we request, we may not be able to deliver those services effectively.

What Kinds of Personal Information Do We Collect and Hold?

When you engage our services, we may collect and hold:

- **Identification information:** name, date of birth, address, contact details, government identifiers (including Tax File Number where you choose to provide it)

- **Financial information:** income, assets, liabilities, superannuation balances, investment holdings, bank account details, transaction information
- **Health and insurance information:** health history and medical information relevant to insurance applications or claims
- **Employment information:** employer details, employment status, occupational details
- **Family and estate information:** details of spouse, dependants, beneficiaries, executors or attorneys
- **Sensitive information:** information about your religion, racial or ethnic origin, political opinions, criminal record, sexual orientation or biometric information, where necessary to provide a specific service and with your consent
- **Records of our interactions:** notes of meetings, records of advice provided, correspondence, complaints, and recordings of phone calls, video meetings and face-to-face meetings (see the Recording section below)

We take reasonable steps to collect personal information directly from you wherever practicable.

For What Purposes Do We Collect, Hold, Use and Disclose Personal Information?

We collect, use, hold and disclose personal information to:

- provide you with financial advice and related services
- assess your eligibility for products or services
- prepare Statements of Advice, Records of Advice and other advice documents
- manage your ongoing financial plan and portfolio
- comply with legislative and regulatory requirements, including under the Corporations Act 2001 (Cth), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), and tax legislation
- prevent fraud, crime or other harmful activities
- respond to your queries and complaints
- market our products and services to you (subject to your right to opt out — see below)

How Do We Collect Personal Information?

We collect most personal information directly from you when you:

- apply for, use or enquire about our products or services
- speak with us in person, by telephone, by video conference, or by email or other written correspondence
- complete forms or questionnaires we provide

We may also collect personal information from third parties including:

- your representatives (accountant, legal adviser, mortgage broker, executor, administrator, guardian, trustee or attorney)
- your employer
- financial institutions, superannuation funds, insurance providers and fund managers
- publicly available sources such as public registers
- fraud prevention and identity verification service providers

What Laws Require or Authorise Us to Collect Personal Information?

We are required or authorised to collect:

- identification information under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and associated Rules
- your Tax File Number, if you choose to provide it, under the Income Tax Assessment Act 1936 (Cth)
- information relevant to insurance applications as required under the Insurance Contracts Act 1984 (Cth)
- records of personal advice provided to retail clients, as required under ASIC Corporations (Record-Keeping Requirements for Australian Financial Services Licensees when Giving Personal Advice) Instrument 2024/508 and section 912G of the Corporations Act 2001 (Cth)

Recording of Phone Calls, Video Meetings and Face-to-Face Meetings

Our Recording Practices

We record telephone conversations, video meetings (including those conducted via Microsoft Teams) and, in some circumstances, face-to-face meetings. We do this to:

- create an accurate record of advice discussions and instructions
- comply with our record-keeping obligations under ASIC Corporations Instrument 2024/508 and the Corporations Act 2001 (Cth)
- ensure the quality and accuracy of financial advice provided to you
- assist with the preparation of file notes and Statements of Advice

We will always notify you at the commencement of a call, video meeting or face-to-face meeting if that meeting is being recorded. You have the right to request that a meeting not be recorded. If you decline to be recorded, we will take contemporaneous written notes of the meeting instead.

Legal Framework

The recording of telephone and video communications is conducted in compliance with the Telecommunications (Interception and Access) Act 1979 (Cth). Our practice is designed to notify participants before recording begins and to obtain consent where appropriate. We aim to conduct recordings lawfully and in a manner consistent with applicable Commonwealth and State or Territory laws.

Retention of Recordings

Recordings of meetings and telephone calls, together with associated transcripts and file notes, are records of personal advice and are retained for a minimum of **seven (7) years** from the date on which the personal advice was provided, as required by ASIC Corporations Instrument 2024/508 and section 912G of the *Corporations Act 2001* (Cth). ASIC and AFCA may request access to these records, and we are required to provide them upon request.

Use of Artificial Intelligence (AI) — Microsoft Copilot

How We Use AI

We use **Microsoft Copilot** as our sole AI tool within our financial advice practice. We use Microsoft Copilot within our Microsoft 365 environment for the following purposes:

- **Transcription:** automatically transcribing recordings of phone calls, video meetings and face-to-face meetings to produce written records
- **Summarisation:** generating summaries of meetings to assist with file note preparation
- **Document drafting:** assisting with the preparation of internal notes, advice documents and correspondence
- **Productivity tasks:** assisting with email drafting, scheduling and information organisation

Enterprise Data Protection

Microsoft Copilot operates under Microsoft's Enterprise Data Protection (EDP) framework at all times. This means:

- Your personal information processed through Copilot is protected by the same contractual terms and security commitments as all other data in our Microsoft 365 environment
- Microsoft does not use your personal information, our prompts or our responses to train its foundation AI models
- Copilot respects our existing Microsoft 365 access controls, sensitivity labels, retention policies and administrative settings
- Data is encrypted both in transit and at rest
- Our tenant data is isolated from other organisations' data

Data Storage Location

Our practice uses Microsoft 365 and Microsoft Copilot with Enterprise Data Protection. Our Microsoft 365 tenant is configured for data storage in Australia, and where client information is held within Microsoft 365 it is stored in accordance with Microsoft's applicable data location and data residency commitments for the relevant in-scope Microsoft 365 services and our tenant configuration. We use Microsoft 365 security, access control, retention and audit features to help protect recordings, transcripts and related client records stored in those environments.

What AI Does Not Do

Microsoft Copilot as used in our practice:

- does not make automated financial advice decisions independently
- does not disclose your personal information outside the Microsoft 365 and service arrangements described in this Policy, except where otherwise required or authorised by law
- does not retain your personal information beyond what is stored in our Microsoft 365 tenant under our control

Automated Decision-Making (ADM) Transparency

In accordance with the Privacy and Other Legislation Amendment Act 2024 (Cth) and APP 1.7 (effective 10 December 2026), we disclose the following about our use of automated decision-making technology:

Kinds of personal information used: Name, contact details, financial information, advice records and meeting transcripts as held in our Microsoft 365 environment.

Kinds of decisions substantially assisted by automated technology: AI assists in producing transcripts and draft file notes of client meetings and telephone calls. These drafts are always reviewed and finalised by a qualified financial adviser before being used for any advice or compliance purpose. AI does not make final decisions; it assists the adviser with documentation only.

Decisions that may significantly affect your rights or interests: At this time, no decisions that significantly affect your legal rights or financial interests are made solely by automated means. All financial advice decisions are made by a qualified human adviser. Should this change, we will update this Policy accordingly.

Your right to request human review: If you have concerns about any aspect of our AI use, you may contact us to discuss your concerns and request that all record-keeping for your matter be conducted by manual means only.

Opting Out of AI-Assisted Processing

You may request that AI-assisted transcription and summarisation not be used in your meetings by contacting us using the details at the end of this Policy. Where you opt out, we will take written notes by hand or other manual means.

How Do We Hold Personal Information?

Storage Systems

Personal information is held:

- **Electronically within our Microsoft 365 environment:** including Microsoft Teams, SharePoint, Outlook and associated Microsoft 365 applications. Personal information held within our Microsoft 365 environment is hosted in Australia through our Microsoft 365 tenant configuration, subject to Microsoft's applicable data location and data residency commitments for the relevant in-scope Microsoft 365 services.
- **In our financial planning software and related systems:** hich use secure cloud infrastructure and security arrangements appropriate to those systems
- **In paper files:** held securely at our premises with restricted access

Security Measures

We take reasonable technical and organisational measures to protect personal information from misuse, interference, loss, unauthorised access, modification and disclosure, including:

- **Technical measures:** multi-factor authentication (MFA) on all Microsoft 365 accounts, encryption of data at rest and in transit, access controls and permissions management, Microsoft Purview information protection, and regular security updates

- **Organisational measures:** access to personal information is restricted to staff who require it to perform their roles; all staff are bound by confidentiality obligations; security practices are reviewed regularly

These measures are consistent with the requirements of APP 11 as strengthened by the POLA Act 2024.

Retention and Destruction of Personal Information

Retention Periods

We retain personal information for as long as necessary for the purposes for which it was collected, or as required by law, including:

Record Type	Minimum Retention Period
Records of personal advice (including meeting recordings, transcripts, Statements of Advice and Records of Advice)	7 years from the date advice was provided (ASIC Corporations Instrument 2024/508)
AML/CTF identification records	7 years from the end of the client relationship
Tax and financial records	As required by the ATO (generally 5–7 years)
All other client personal information	7 years from the date advice was provided, or longer if operationally required.

Destruction and De-identification

Once personal information is no longer required and the applicable retention period has expired, we take reasonable steps to securely destroy or permanently de-identify it in accordance with APP 11.2. Destruction of electronic records includes secure deletion from our Microsoft 365 environment. Paper records are securely shredded.

Who Do We Disclose Your Personal Information To, and Why?

We may disclose personal information to organisations that assist us in providing services to you, including:

- **Our licensee:** Australian Wealth Holdings Pty Ltd (AFSL 481674), and its related entities
- **Financial services organisations:** superannuation funds, fund managers, platforms, custodians, insurers, banks and stockbrokers
- **Your representatives:** accountant, legal adviser, mortgage broker, executor, administrator, guardian, trustee or attorney
- **IT service providers and cloud platform providers:** including Microsoft, operating under Enterprise Data Protection terms
- Our legal advisers and auditors
- Fraud prevention and identity verification services
- External dispute resolution schemes (including AFCA)
- Regulatory bodies, government agencies and law enforcement authorities in any jurisdiction

We disclose personal information to third parties only to the extent necessary for them to perform the specific role we ask them to perform.

Do We Disclose Personal Information Overseas?

In the ordinary course of our business, we do **not** generally disclose your personal information to recipients located outside Australia. Personal information held within our Microsoft 365 environment is hosted in Australia through our Microsoft 365 tenant configuration, subject to Microsoft's applicable data location and data residency commitments for the relevant in-scope Microsoft 365 services.

We may disclose personal information overseas in the following limited circumstances:

- where you have asked us to make enquiries on your behalf with a financial institution or fund in which you hold an account overseas
- where you have otherwise expressly consented to overseas disclosure

Where overseas disclosure occurs, we take reasonable steps under APP 8 to ensure the overseas recipient handles your information in a manner consistent with the APPs.

Do We Use or Disclose Personal Information for Marketing?

We may use your personal information to inform you about products and services that may be of interest to you, including by email, telephone, mail or other electronic means. We will not use your information for direct marketing if you ask us not to. If you do not wish to receive marketing communications from us, please contact us using the details at the end of this Policy.

Do We Collect Personal Information Electronically?

We may collect information from you electronically when you visit our website (www.forwoodplanning.com.au) or send us electronic correspondence. When you visit our website, we may collect:

- dates and times of visits
- pages viewed and how you navigate through the site
- device information and IP addresses

We use cookies to improve your website experience. Cookies stored on your device cannot access your personal files or command your device to perform any action. We will not ask you to supply personal information publicly via social media platforms.

Access to and Correction of Personal Information

You may request access to personal information we hold about you and ask for corrections. Please contact us using the details below.

There is no fee for requesting correction of your personal information. A reasonable fee may be charged to cover the cost of locating and supplying information in response to an access request.

If we refuse a request for access or correction, we will provide written reasons and advise how you can complain about the refusal. If we refuse to correct your personal information, you may request that a statement be associated with your record noting your disagreement with its accuracy.

Resolving Privacy Concerns and Complaints

If you have a concern about how we handle your personal information, or a complaint about a breach of the APPs, please contact us in the first instance:

Forwood Planning — Privacy Contact
Phone: 07 3103 3038
Email: info@forwoodplanning.com.au
Post: PO Box 1291, New Farm QLD 4005

We will acknowledge your complaint as soon as practicable and aim to resolve it within five business days. Complex complaints may take longer; we will keep you informed of progress and provide a reasonable timeframe for resolution.

External Complaints Bodies

If you are not satisfied with our response, you may also contact:

Australian Wealth Holdings Pty Ltd — Privacy Officer
Phone: 07 3103 3038
Email: admin@austwealth.com
Post: PO Box 1291, New Farm QLD 4005

Australian Financial Complaints Authority (AFCA)
For privacy complaints involving financial services providers.
GPO Box 3, Melbourne VIC 3001
Phone: 1800 931 678
Website: www.afca.org.au

Office of the Australian Information Commissioner (OAIC)
For complaints about breaches of the Australian Privacy Principles.
GPO Box 5288, Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au

Changes to This Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology or legal obligations. The most current version is always available on our website at www.forwoodplanning.com.au or by contacting us.

Contact Us

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Website: www.forwoodplanning.com.au

Forwood Planning (ABN 58 556 913 005) is an authorised representative of Australian Wealth Holdings Pty Ltd (ABN 72 608 528 427) AFSL 481674. This Policy applies to all personal information collected and held by Forwood Planning in the course of providing financial advice and related services. Last updated: June 2026