

Privacy Policy

High Street Wealth Pty Ltd

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Version: 2.0

1. About this Privacy Policy

High Street Wealth Pty Ltd is an Australian Financial Services Licensee (AFSL 514347) that collects, holds, uses, and discloses personal information to provide financial advice and related services to our clients.

This Privacy Policy explains how we manage personal information in accordance with the **Privacy Act 1988 (Cth)** and the **Australian Privacy Principles**. The Australian Privacy Principles regulate the collection, use, disclosure, quality, security, access to and correction of personal information by organisations covered by the Privacy Act.

This policy applies to personal information we collect from clients, prospective clients, authorised representatives, professional contacts, service providers and other people who interact with us.

This policy does not replace any privacy collection notice, consent form, financial services guide, client service agreement, authority, statement of advice, ongoing service agreement or other document we may provide to you. Those documents may contain additional information about how your personal information is handled in particular circumstances.

2. What personal information we collect

The kinds of personal information we collect will depend on the nature of your relationship with us and the services you request.

We may collect personal information such as:

- your name, address, telephone number, email address and other contact details;
- your date of birth, age, gender and family circumstances;
- information about your spouse, partner, dependants, beneficiaries, attorneys, trustees, company officers or other related persons, where relevant to the services we provide;
- employment, income, assets, liabilities, expenses and cashflow information;
- taxation, superannuation, investment, insurance, estate planning and retirement information;
- information about your goals, objectives, needs, priorities, preferences and risk profile;
- banking and payment information;
- government identifiers, where legally permitted or required, such as tax file numbers or Centrelink reference details;
- identity verification information;
- information contained in emails, file notes, telephone records, meeting notes, authorities, advice documents, application forms and client service records;
- complaints, feedback and dispute information;
- information required to comply with legal, regulatory, professional, licensing, audit and record-keeping obligations.

We may also collect **sensitive information** when it is reasonably necessary for the services we provide and when we have your consent or another legal basis to do so. Sensitive information may include health information relevant to insurance advice, estate planning, aged care planning or other financial advice matters.

3. How we collect personal information

Our preference is to only collect personal information directly from you or from others with your knowledge and consent.

We may collect information when you:

- enquire;
- complete a fact find, risk profile, application form, authority or consent form;
- meet with us in person, by telephone, by video conference or online;
- send us documents or emails.
- use our website or digital services;
- ask us to provide financial advice or ongoing services;
- make a complaint or request access to, or correction of, your information.

We may also collect personal information from third parties where it is reasonable to do so, including:

- superannuation funds;
- investment platforms;
- insurers;
- banks and other financial institutions;
- accountants, solicitors, mortgage brokers and other professional advisers;
- your employer, where relevant and authorised;
- government agencies, where lawful and necessary;
- publicly available records;
- product issuers, administrators and service providers;
- your authorised representative, attorney, guardian, executor, trustee or family member, where appropriate.

Where we collect personal information about you from someone else, we'll take reasonable steps to make you aware of that collection where required.

4. Why we collect, use and disclose personal information

We collect, use, and disclose personal information to provide financial advice and related services.

This may include using or disclosing your personal information to:

- assess your financial position, objectives, needs and circumstances;
- provide personal financial advice;
- prepare advice documents, including statements of advice and records of advice;
- implement advice you choose to proceed with;
- review and manage existing financial arrangements;
- provide ongoing advice and service arrangements;
- communicate with you and respond to your enquiries;
- verify your identity;
- assist with applications, transactions, rollovers, withdrawals, claims and account updates;
- liaise with superannuation funds, insurers, investment platforms, product providers and other third parties;
- manage fees, payments and service arrangements;
- comply with legal, regulatory, licensing, audit, professional and record-keeping obligations;
- supervise, review and audit advice files;
- handle complaints, disputes, remediation and regulatory enquiries;
- manage business administration, technology, cybersecurity and data storage;
- protect our legal rights and manage risk.

We'll generally use or disclose your personal information for the purpose for which it was collected, for a related purpose you would reasonably expect, where you have consented, or where we are required or authorised by law.

5. Declining to provide personal information

You're not required to provide us with your personal information. However, if you don't provide information we reasonably need, we may not be able to:

- assess your financial position, objectives and needs;
- provide personal financial advice;
- determine whether advice is appropriate for you;
- implement your instructions;
- provide ongoing services;
- verify your identity;
- comply with legal or regulatory obligations.

In some cases, we may need to decline to provide advice or services if we don't have sufficient information.

6. Anonymity and pseudonymity

You may deal with us anonymously or under a pseudonym where lawful and practicable.

For example, you may make a general enquiry without identifying yourself.

However, because of the nature of personal financial advice, we'll usually need to identify you and collect relevant personal information before we can provide advice or implement financial arrangements. In many circumstances, providing advice without accurate personal information would be neither appropriate nor lawful.

7. Collecting sensitive information

We'll only collect sensitive information where:

- you have consented, and the information is reasonably necessary for our functions or activities;
- the collection is required or authorised by law; or
- another exception under the Privacy Act applies.

Sensitive information may include health information relevant to insurance advice, claims, aged care advice, estate planning or financial planning for illness, disability or incapacity.

We'll only use or disclose sensitive information for the purpose for which it was collected, a directly related purpose you would reasonably expect, with your consent, or where required or authorised by law.

8. Disclosing personal information

We may disclose personal information to third parties where reasonably necessary for the services we provide or where otherwise permitted by law.

These third parties may include:

- our Australian financial services licensee, where applicable;
- authorised representatives, advisers, paraplanners, client service officers and support staff;
- superannuation funds;
- investment platforms;
- fund managers;
- insurers and insurance administrators;
- banks, lenders and other financial institutions;
- accountants, solicitors, tax advisers, estate planning advisers and other professional advisers;
- external consultants, auditors, compliance reviewers and file reviewers;
- technology, software, cloud storage, document management and cybersecurity providers;
- administration, mailing, printing and document execution service providers;
- payment and billing service providers;
- dispute resolution bodies;
- regulators, including ASIC and the Office of the Australian Information Commissioner;
- courts, tribunals, law enforcement agencies or government agencies where required or authorised by law;
- any person you authorise us to deal with.

We don't sell your personal information.

9. Overseas disclosure and cloud services

We may use cloud-based technology, data hosting, software, backup, email, document management or outsourced administration services. Some of these services may involve the storage of, access to, or processing of personal information outside Australia.

Before disclosing personal information to an overseas recipient, we'll take the reasonable steps required by the Privacy Act to ensure the recipient handles personal information in accordance with the Australian Privacy Principles, unless an exception applies. OAIC guidance explains that APP 8 generally requires an APP entity to take reasonable steps to ensure an overseas recipient handles personal information in accordance with the APPs, and that the entity may remain accountable if the overseas recipient mishandles that information.

Personal information is stored or accessed in Australia.

We'll review our service provider arrangements from time to time and update this policy as needed for material changes.

10. Direct marketing

We may use your personal information to send you information about financial advice services, updates, newsletters, events, educational material or other information that may be relevant to you.

We'll only do this where permitted by law. You may opt out of receiving direct marketing communications at any time by:

- using the unsubscribe function in an electronic communication;
- contacting us by telephone; or
- emailing us at bill@highstreetwealth.com.au.

We won't use sensitive information for direct marketing without your consent.

11. Government identifiers

We may collect, use or disclose government identifiers where necessary and permitted by law. These may include tax file numbers, Centrelink reference details or other government-issued identifiers relevant to the services we provide.

We won't use a government identifier as your identifier unless permitted by law.

12. Quality of personal information

We'll take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up to date, complete and relevant.

You can help us by promptly notifying us of any changes to your personal information, including your contact details, employment, family circumstances, financial position, objectives, health, insurance needs, or other matters relevant to the advice or services we provide.

13. How we protect personal information

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification and disclosure.

These steps may include:

- secure physical storage of hard copy records;
- password protection and access controls;
- multi-factor authentication where available and appropriate;
- secure document management systems;
- staff confidentiality obligations;
- controlled access to client files;
- secure destruction or de-identification of information no longer required;
- cybersecurity controls;
- data backup and business continuity arrangements;
- service provider due diligence;
- incident response procedures.

No method of transmission or storage is completely secure. However, we'll take reasonable steps proportionate to the nature of the information we hold and the risks associated with our business.

14. Retention and destruction of personal information

We retain personal information for as long as reasonably necessary for the purposes for which it was collected, including providing services, maintaining client records, complying with legal and regulatory obligations, managing disputes, and meeting audit or professional requirements.

Financial advice records generally need to be retained for extended periods due to legal, regulatory, licensing, professional indemnity insurance and dispute management requirements.

When we no longer require personal information and are legally permitted to do so, we'll take reasonable steps to destroy or de-identify it securely.

15. Data breaches

We maintain procedures for identifying, assessing and responding to suspected data breaches.

A data breach may occur if personal information is lost, accessed by an unauthorised person, disclosed without authorisation, or otherwise compromised.

Where we suspect that a data breach has occurred, we'll assess the incident and take appropriate remedial action. If the breach is an **eligible data breach** under the Notifiable Data Breaches scheme, we'll notify affected individuals and the Office of the Australian Information Commissioner as required. The OAIC explains that an eligible data breach involves unauthorised access to, unauthorised disclosure of, or loss of personal information, likely serious harm, and an inability to prevent the likely risk of serious harm through remedial action.

16. Access to personal information

You may request access to the personal information we hold about you.

To protect your privacy and security, we may need to verify your identity before giving access.

We'll generally respond to access requests within a reasonable period. In some cases, we may refuse access where permitted by law. If we do so, we'll explain the reason for refusal unless it would be unreasonable or unlawful to do so.

We may charge a reasonable fee for giving access where permitted by law. We won't charge a fee simply for making an access request.

17. Correction of personal information

You may ask us to correct personal information we hold about you if you believe it is inaccurate, out of date, incomplete, irrelevant or misleading.

If we are satisfied that correction is required, we'll take reasonable steps to correct the information.

If we don't agree to correct the information, we'll explain why, unless it would be unreasonable or unlawful to do so. You may ask us to associate a statement with the information, noting that you believe it is inaccurate, out of date, incomplete, irrelevant or misleading.

18. Privacy complaints

If you have a concern or complaint about how we have handled your personal information, please get in touch with us first so we can try to resolve the matter.

You can contact us at:

Privacy Officer

High Street Wealth Pty Ltd
Suite 317 / 410 Concord Road
Rhodes NSW 2138

Telephone: 1300 034 087

Email: info@highstreetwealth.com.au

Please include enough information for us to understand and assess your complaint.

We'll acknowledge your complaint within a reasonable period and aim to respond promptly. If we need more time because the matter is complex, we'll let you know.

If you are not satisfied with our response, you may contact the **Office of the Australian Information Commissioner**.

OAIC website: www.oaic.gov.au

19. Links to other websites

Our website or communications may contain links to third-party websites.

We are not responsible for the privacy practices, security or content of third-party websites. You should review the privacy policy of any third-party website you visit.

20. Changes to this Privacy Policy

We may update this Privacy Policy from time to time to reflect changes in law, regulatory guidance, technology, business practices or the services we provide.

The current version will be made available on request, but it's always available on our website.