



## Privacy Policy

Effective Date: 15 January 2026

At Gradient Wealth (referred to as we, us, our), we are committed to protecting the privacy and security of your personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This Privacy Policy outlines how we collect, use, store, disclose and protect your personal information, and how you can access or correct the personal information we hold about you.

### 1. What personal information we collect

We may collect personal information that is necessary for us to provide financial planning and related services. This may include:

- Full name, contact details (email, phone, address)
- Date of birth and identity details
- Financial and investment information
- Employment and income details
- Tax file number and other government identifiers (where required)
- Sensitive information (such as health information) only if necessary for advice (e.g., insurance planning)
- Any other information you voluntarily provide to us in meetings, forms, or correspondence

We only collect personal information relevant to the services we provide to you.

### 2. How we collect your personal information

We may collect your personal information:

- Directly from you (in person, by phone, email, forms or online)
- From third parties with your consent (e.g., accountants, legal advisors)
- Through your use of our website (e.g., cookies – see section 8 below)

We will not collect sensitive information without your consent and only if it is required to provide the specific service you have requested.

### 3. How we use your personal information

We use your personal information to:

- Provide financial planning and advice services tailored to your situation
- Communicate with you about your account, services, appointments or requests
- Comply with legal and regulatory obligations
- Manage our internal operations (including invoicing, record keeping and quality assurance)
- Send you updates, newsletters or information about services.

If you choose not to provide certain information, we may not be able to provide the full range of services or advice.

### 4. Disclosure of your personal information

We will not sell, trade or rent your personal information.

We may disclose your personal information:

- To our licensee or other entities involved in providing services to you
- To third party service providers (e.g., IT, administrative support, mailing services) who are bound to protect your information as well
- Where required by law, or if permitted under the Privacy Act
- In the event of a corporate sale, merger, re-organisation or similar event, subject to assurances that your information will be protected

We take reasonable steps to ensure that any third party to whom we disclose your information will handle it in a way that is consistent with this Policy and the APPs.

## 5. Overseas disclosure

Some of our service providers may be located overseas. In such cases, we take reasonable steps to ensure appropriate safeguards are in place to protect your personal information before it is sent to overseas recipients.

## 6. Access to and correction of your personal Information

You have the right to request access to the personal information we hold about you. You may also ask us to correct or update your personal information if it is inaccurate, incomplete or out of date.

To make a request, please contact our Privacy Officer (details below). We will respond to your request within a reasonable time, and we do not charge for access or correction unless permitted by law.

## 7. Security of Your Personal Information

We take reasonable steps to ensure the personal information we hold is protected from misuse, loss, unauthorised access, modification or disclosure. This may include:

- Physical and electronic security safeguards
- Secure storage and access controls
- Staff training on privacy obligations

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

## 8. Marketing Communications

We may contact you with relevant service information, updates or newsletters only if you have consented to receive electronic communications. You can opt out at any time by notifying us.

## 9. Complaints

If you have a privacy complaint, please contact us in writing/email. We will investigate and respond promptly. If you are not satisfied with our response, you have the right to contact the Office of the Australian Information Commissioner (OAIC).

## 10. Changes to This Policy

We may update this Policy from time to time. The updated version will be published on our website with an updated effective date.