



# **Havana Financial Services Pty Ltd** **Privacy Policy**

The privacy of your personal information is important to us at Havana Financial Services Pty Ltd. In addition to complying with existing laws that govern confidential information that you provide to us, we are also required to comply with the Australian Privacy Principles. We will always seek to comply with the Australian Privacy Principles as well as other applicable laws surrounding your personal information.

This privacy policy will explain how we manage your personal information, what sort of personal information we hold and for what purposes. As well as how we collect, hold, use and disclose that information.

### **Collecting Your Personal Information**

Your personal information will be collected and held by Havana Financial Services Pty Ltd who is the holder of Australian Financial Services Licensee 500435, for the purposes of:

- managing our relationship with you; or
- contacting you about products and services in which you may be interested.

To enable Havana Financial Services to provide you with service that is required, we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- Authorised Representative details.
- employment details and history;
- any other information that we consider necessary.

The personal information collected may include sensitive information such as memberships of professional or trade associations.

If it is reasonable and practicable we will only collect your personal information from you. Generally, your personal information will be collected when you meet with a Havana Financial Services representative in person, over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant.

### **How We Hold Your Personal Information**

Your personal information will be held in client files or on a computer database

We will seek to ensure that we take reasonable steps to ensure that the personal information that we hold is protected from unauthorised access. Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems.

For any personal information that we no longer need we will also take reasonable steps to destroy or permanently de-identify.

### **Using and Disclosing Your Personal Information**

Your personal information may be disclosed for purposes related to the provision of the financial Service you receive. The types of service providers that may be provided with your personal information are:

- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

Your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or
- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

### **Organisations outside Australia**

### **Currently, we do not share your information with organisations outside Australia.**

As we also store your information in the cloud or other types of network and/or electronic storage. These can be accessed from various countries through an internet connection. Disclosures may occur in countries other than those listed. Overseas we may be required to disclose information we share with them under a foreign law.

### **Accessing your Personal Information**

If you wish to gain access to the personal information that we hold. This can be done, there may be exceptions by law. If we deny a request for access, we will provide you with the reasons for this decision. To request access please contact us.

### **Correcting Your Personal Information**

We endeavour to take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see “Contacting Us and Privacy Issues” below) and provide us with evidence that it is not accurate, complete and up-to-date.

If we agree that the personal information requires correcting, we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not correcting your personal information. If you request that we associate with the information a statement claiming that the information is not accurate, complete and up-to-date we will take reasonable steps to comply with this request.

### **Contact Us**

If you wish to obtain further information about the way in which we manage the personal information that we hold. Or if you wish to raise any privacy issues with us, including a complaint about privacy. This can be done by contacting us on 02 8004 6299.