Throughlife Financial Solutions



Privacy Policy

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Background

As an Australian Financial Services Licensee (AFSL) and a holder of personal information about our clients, it is our objective to ensure that Throughlife Financial Solutions Pty Ltd (Throughlife Financial Solutions) and its representatives comply with all relevant aspects of the Australian Privacy Principles (APPs), as set out in the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

The APPs require Throughlife Financial Solutions to take reasonable steps to protect the personal information it holds from misuse, interference and loss, as well as unauthorised access, modification, or disclosure under APP11 – Security of Personal Information.

Licensees who trade in personal information have additional obligations under the remaining APPs. All Licensees holding personal information are expected to implement a Privacy Policy in compliance with the APPs.

Adherence to the Throughlife Financial Solutions Privacy Policy is expected and will be monitored to ensure that personal information is secured adequately and breaches, both suspected and actual, are treated appropriately as per the guidelines set by the Office of the Australian Information Commissioner (OAIC).

Purpose

This Privacy Policy explains how we (and our representatives) collect, use, hold and disclose the personal information you provide to us.

As a Licensee, Throughlife Financial Solutions ensures that there are adequate resources in place to develop, implement, and maintain the privacy program and response plan. All representatives of Throughlife Financial Solutions are aware of the privacy program and are encouraged to identify privacy issues and notify directly to Throughlife Financial Solutions.

Throughlife Financial Solutions is required to meet legislative and regulatory requirements. The information that we seek to collect about you will depend on the products or services that we provide. If you provide inaccurate or incomplete information, we may not be able to provide you with the services you requested.

We encourage you to check our website regularly for any updates to our Privacy Policy.

Why do we need a Privacy Policy?

The Office of the Australian Information Commissioner (OAIC) oversees the Privacy Act. Its focus is to strengthen the protection of personal information and keep it secure. It's the responsibility of APP entities to secure and protect the personal information they hold and prevent breaches from occurring.

The Notifiable Data Breach (NDB) Scheme provides a framework that requires businesses to respond swiftly and with transparency to mitigate the damage potentially caused by a breach.

This ultimately gives consumers more confidence that their personal information is being appropriately safeguarded and that they will be made aware if their information is compromised.

Throughlife Financial Solutions Commitment to Privacy for our Clients

Throughlife Financial Solutions is committed to providing the highest levels of client service.

Throughlife Financial Solutions recognises that privacy is very important to everybody. As such, the organisation is committed to providing a privacy program that ensure the correct management of personal information, identification of breaches or suspected breaches of the Policy and utilising the breach Response Plan to ensure we can respond quickly to suspected data breaches, and take appropriate steps as required under the NDB Scheme.

In line with the Privacy and Other Legislation Amendment Act 2024 and further reforms anticipated under the Australian Government's privacy reform program, [short name] is committed to ensuring that the collection, use and disclosure of personal information is *fair and reasonable* in the circumstances, and not solely reliant on consent. [short name] also recognises that individuals have a right to bring action against entities for serious invasions of privacy under the statutory tort introduced by the 2024 reforms, and treats privacy compliance as a core governance and risk obligation overseen by the Compliance Committee/Board.

What are the Australian Privacy Principles (APP)?

1. Open and transparent management of personal information
2. Anonymity and pseudonymity
3. Collection of solicited personal information
4. Dealing with unsolicited personal information
5. Notification of the collection of personal information
6. Use or disclosure of personal information
7. Direct Marketing
8. Cross-border disclosure of personal information
9. Adoption, use or disclosure of government related identifiers
10. Quality of personal information
11. Security of personal information
12. Access to personal information
13. Correction of personal information

Throughlife Financial Solutions as an organisation has ensured that its privacy program embraces the principles established by the APPs under the Privacy Act.

Cyber Privacy Principles

In addition to the APPs, the Digital ID Act 2024 has introduced privacy cyber safeguards, that AFS Licensees must also follow:

1. Minimal and regulated collection, use, and storage of biometric data (such as fingerprints)
2. Requirement for express consent before handling biometric data and AI decision-making
3. Personal information cannot be used for profiling individuals, beyond permitted purposes
4. Digital ID data cannot be accessed or used for law enforcement purposes without proper authorisation
5. Limited use of Digital ID data for direct marketing, unless explicit consent provided
6. Collection, storage and use of Digital ID information must be disclosed
7. Implementation of robust security measures to protect personal data
8. Collection and retention of personal information to be limited
9. Unique Identifier cannot be shared across different services without consent
10. Data related to race, ethnicity, or religious beliefs must be handled with additional safeguards
11. Individuals must have the ability to manage and delete their Digital ID information
12. Accredited entities must report data breaches under the Notifiable Data Breaches scheme

Your Personal Information

What Throughlife Financial Solutions may collect:	When you apply for our products or services, we may ask for identification information. This could include your name, address, contact details and date of birth. We may also collect your tax file number if we are authorised to collect it, and if you choose to supply it. Some of the information we collect is to ensure that we can meet other legislative requirements such as the Anti-Money Laundering and Counter-Terrorism Financing Amendment Act 2024.
How Throughlife Financial Solutions collects Personal Information:	We collect personal information directly from you and, if authorised by you, from third parties also. You have a right to refuse authorisation for us to collect information from a third party.
How Throughlife Financial Solutions uses your Personal Information:	Primarily, your personal information is used to provide you with products or services. We may also use the information that is related to the primary purpose, and it is reasonable for you to expect that information to be disclosed to assist us in providing you with the service. Occasionally, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. We may only use sensitive information about you for direct marketing once we have received your consent.

Throughlife Financial Solutions maintains records of the source of the personal information used for direct marketing and you have the right to request these details. We will endeavour to meet your request within two (2) weeks.

In compliance with the Anti-Hawking legislation, we maintain a register for those individuals not wanting to receive direct marketing materials.

When Throughlife Financial Solutions can disclose your information:

In line with the business practices of many financial institutions, and to meet your specific needs, we may disclose your personal information to the following organisations:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service,
- compliance consultants,
- temporary staff to handle workloads during peak periods,
- mailing houses and email marketing service providers,
- your professional advisers, including your solicitor or accountant as authorised by you,
- information technology service providers,
- Government and regulatory authorities, as required or authorised by law,
- another authorised representative of Throughlife Financial Solutions if necessary,
- a potential purchaser/organisation involved in the proposed sale of Throughlife Financial Solutions business for the purpose of due diligence, corporate re-organisation and transfer of all or part of the assets of the business. Disclosure will be made in confidence, and it will be a condition of that disclosure that no personal information will be used or disclosed by them,
- a new owner of the business that will require the transfer of your personal information.

Throughlife Financial Solutions employees and the outsourcing companies/ contractors are obliged to respect the confidentiality of any personal information held by Throughlife Financial Solutions.

The Corporations Act has provided the Australian Securities and Investments Commission (ASIC) with the authority to inspect certain personal information that is kept on Throughlife Financial Solutions files about you.

Throughlife Financial Solutions takes its obligations to protect your information seriously, this includes if/when Throughlife Financial Solutions operates throughout Australia and overseas, as part of its operations. Some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. In some circumstances we may need to

obtain your consent before disclosure of your information outside Australia occurs.

How Throughlife Financial Solutions stores and secures your Personal Information:

Throughlife Financial Solutions keeps your personal information in your client files and electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements.

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

It is a legislative requirement that Throughlife Financial Solutions keeps all personal information and records related to a provided service for a period of at least seven (7) years. Should you cease to be our client, we will maintain your personal information on or off site in a secure manner for at least seven (7) years after you cease to be a client. Throughlife Financial Solutions also conducts regular security audits to ensure compliance with legislative requirements.

Consistent with the uplifted "reasonable steps" requirement under APP 11, [short name] maintains a combination of *technical measures* (including data encryption in transit and at rest, multi-factor authentication, role-based access controls, network and endpoint protection, system logging and monitoring) and *organisational measures* (including documented policies and procedures, staff training, confidentiality obligations, periodic access reviews and incident response arrangements) to protect personal information across its lifecycle – from collection, use and storage through to secure destruction or de-identification when no longer required.

Where [short name] engages third party service providers or outsourced suppliers (including cloud, IT and administration providers) that handle personal information on our behalf, [short name] conducts appropriate due diligence and puts written arrangements in place that require those providers to handle personal information in a manner consistent with the APPs and this Policy.

Do we share or send personal information to overseas recipients?

Some of the entities we use to store and send your personal information to may be located in or operate in countries outside of Australia. We take reasonable steps to ensure the overseas entity protects your information against unauthorised access or loss. This includes conducting due diligence and entering into contracts with these overseas providers. When we entrust your personal

information to overseas recipients, we ensure they have reasonable data handling and security arrangements in place, and we periodically review our arrangements with these entities.

[short name] will take all steps as are reasonable in the circumstances to ensure overseas recipients do not breach the APPs in relation to your personal information.

Ensuring your Personal Information is correct:

Throughlife Financial Solutions takes all reasonable precautions to ensure that the personal information collected, used and disclosed is accurate, complete and up to date. To ensure that we can maintain this level of accuracy and completeness it is recommended that, as soon as possible, you:

- Inform us of any errors in your personal information, and
- Update us with any changes to your personal information.

Receiving Unsolicited Information:

Throughlife Financial Solutions does not usually collect unsolicited personal information. Where we received unsolicited personal information, it will be determined whether it would have been permissible to collect this information if it had been solicited. If Throughlife Financial Solutions determines that collection would not have been permissible, to the extent permitted by law, the personal information will be appropriately destroyed or de-identified as soon as practicable.

Accessing your own Personal Information:

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide a request in writing (for security purposes) and we will provide you with access to that personal information. Access to the requested personal information may include:

- Providing you with copies,
- Providing you with the opportunity for inspection, or
- Providing you with a summary.

If charges are applicable in providing access to you, these charges will be disclosed to you prior to providing the information. Some exceptions exist where Throughlife Financial Solutions will not provide you with access to your personal information, these include if:

- Providing access would pose a serious threat to the life or health of a person,
- Providing access would have an unreasonable impact on the privacy of others,
- The request for access is frivolous or vexatious,

- The information is related to existing or anticipated legal proceedings between Throughlife Financial Solutions and a client and would not be discoverable in those proceedings,
- Providing access would reveal Throughlife Financial Solutions intentions in relation to negotiations with you in such a way as to prejudice those negotiations,
- Providing access would be unlawful,
- Denying access is required or authorised by or under law, and
- Providing access would be likely to prejudice certain operations by, or on behalf of, an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, a written explanation for that refusal will be provided.

Using Government Identifiers

In certain circumstances Throughlife Financial Solutions is required to collect Government identifiers such as your tax file number (TFN), Medicare number or pension card number. Throughlife Financial Solutions does not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Document Verification Services (DVS)

DVS are systems designed to verify the authenticity of identity documents by checking them against official government records. These systems can be utilised to confirm biographic details, such as address, employment, education certification, and citizenship.

As per the Identity Verification Services Act 2024, Throughlife Financial Solutions will ensure explicit consent is provided, in writing, prior to the utilisation of Document Verification Services.

Dealing with Throughlife Financial Solutions Anonymously

You can deal with us anonymously or by using a pseudonym where it is lawful and practicable to do so, for example when telephoning to request publicly accessible information such as our postal address or operating hours.

It would not be lawful to access our products or services anonymously or by using a pseudonym.

Your Sensitive Information

Without your consent Throughlife Financial Solutions will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, memberships of professional or trade associations, membership of a trade union, details of health, disability, sexual orientation or criminal record.

This is subject to some exceptions, including if collection is required by law or when the information is necessary for the establishment, exercise, or defence of a legal claim.

Throughlife Financial Solutions Website

Throughlife Financial Solutions website may provide links to third party websites. If you disclose personal information to these third-party sites, the use of your information by these third parties is not within Throughlife Financial Solutions control and Throughlife Financial Solutions cannot accept responsibility for the conduct of these organisations. Other websites are not subject to Throughlife Financial Solutions privacy standards. You will need to contact or review those websites directly to ascertain their privacy policies.

You may register on Throughlife Financial Solutions website to receive newsletters and other information, and by doing so, your name and email address will be collected and stored on Throughlife Financial Solutions database. We will take care to ensure that the personal information you provide on our website is protected by having electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from Throughlife Financial Solutions, or you wish to update your registration details, please email your request directly to us. We will endeavour to meet your request within five (5) business days.

Our website utilises cookies to provide you with a better user experience. Cookies also allow Throughlife Financial Solutions to identify your browser while you are using the site – the cookies do not identify you personally. If you do not wish to receive cookies, you can instruct your web browser to refuse these cookies.

Automated Decision Making (ADM)

From December 2026, Clients are required to be informed about, and provide consent to, the use of AI in relation to Automated Decision Making (ADM).

Throughlife Financial Solutions ensures that clients are provided with the knowledge, to make informed decisions about the use of AI regarding their financial service or product, through

publication of this on Throughlife Financial Solutions website, or through the disclosure documents provided.

ADM AI Systems may be used in areas like financial risk assessment, client suitability, and personalised recommendations. For example, these systems can be used to assess a client's suitability based on factors like income, spending patterns, and credit history. These systems automatically determine whether the applicant qualifies for a product, service, or whether it is applicable to their risk appetite. The use of ADM systems in Throughlife Financial Solutions is heavily regulated and maintained by Throughlife Financial Solutions as per the Artificial Intelligence Policy's approval and utilisation procedure.

In line with the transparency obligations commencing in December 2026, where ADM is used in a decision that significantly affects you, [short name] will disclose the kinds of personal information used in the decision, the types of decisions made (whether wholly or substantially) by ADM, and how those decisions are made. You may request human review of any such decision by contacting [short name]'s Privacy Officer.

Spam Policy

Spam is a generic term used to describe electronic 'junk mail' – unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as "unsolicited commercial electronic messages".

Electronic messaging covers emails, instant messaging (IM), SMS and other mobile phone messaging, but it does not cover normal voice-to-voice communications by telephone.

Throughlife Financial Solutions complies with the provisions of the Spam Act 2003 when sending commercial electronic messages. In addition, Throughlife Financial Solutions is also bound by their own internal Anti-Hawking Policy.

The Spam Act 2003 specifies that the person's consent has been withdrawn within five (5) working days from the date that an 'unsubscribe' request was sent (in the case of electronic unsubscribe messages) or delivered (in the case of unsubscribe messages sent by post or other means).

Throughlife Financial Solutions follows the following steps when using electronic messaging:

1. Consent – only commercial electronic messages are sent with the addressee's consent, either inferred or expressed consent.
2. Identify – electronic messages will include clear and accurate information about the person and the Throughlife Financial Solutions contact that is responsible for sending the commercial electronic message.
3. Unsubscribe – Throughlife Financial Solutions ensures that a functional unsubscribe facility is included in all its commercial electronic messages and deals with unsubscribe requests promptly.

Commercial Communications with a Forwarding Facility (Viral Messages)

Throughlife Financial Solutions ensures that Commercial Communications that include a Forwarding Facility comply with the law by containing a clear recommendation. This recommendation is that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, and where that relationship means that the person could be said to have consented to receiving Commercial Communications.

Complying with the Age Sensitive Content of Commercial Communication

Where content of a Commercial Communication seeks to promote or inspire interaction with a product, service or event that is age sensitive, Throughlife Financial Solutions takes reasonable steps to ensure that such content is sent to Recipients who are legally entitles to use or participate in the product, service or event.

Privacy Complaints Process

Clients may contact Throughlife Financial Solutions Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within seven (7) days. Throughlife Financial Solutions Privacy Officer will investigate the issue and determine steps to undertake to resolve your complaint.

Throughlife Financial Solutions Privacy Officer will contact you if any additional information is required from you and will notify you in writing of the determination.

Throughlife Financial Solutions Privacy Officer:	Jacqui Stewart
Address:	P O Box 702, Morley WA 6943
Telephone Number:	08 9375 1149
Email:	admin@throughlife.com.au

If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

Office of the Australian Information Commissioner
GPO Box 5288, Sydney NSW
1300 363 992
www.oaic.gov.au

Following the 2024 Privacy Act reforms, the OAIC has expanded enforcement powers, including the ability to issue infringement notices and compliance notices, conduct public inquiries, develop binding APP codes, and seek tiered civil penalties for interferences with privacy. [short name] cooperates fully with any such regulatory action and treats OAIC determinations and directions as binding.

Related Laws and Regulations

There may be times when other legislation or obligations override the obligation in the Privacy Act 1988 and the Privacy Amendment (Enhancing Privacy Protection) Act 2012. These include, but are not limited to:

- The Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act), where Throughlife Financial Solutions is required to report suspicious matters and threshold transactions to AUSTRAC.
- Regulatory Guide 78 *Breach reporting by AFS licensees*, where Licensees are required to report any breach or potential breach to ASIC
- Mandatory reporting requirements during a Disaster Recovery event or in the event of a Cyber breach as detailed in the Corporations Act 2001
- Requirement with regards to ATO requests.
- ASIC Regulatory Guide 271 *Internal dispute resolution*, which applies to both AFS and credit licensees in handling privacy and other complaints.
- The Privacy and Other Legislation Amendment Act 2024, which strengthens the OAIC's enforcement and investigation powers, introduces a statutory tort for serious invasions of privacy, uplifts "reasonable steps" security requirements under APP 11, and introduces transparency obligations for automated decision-making.
- The Criminal Code Act 1995 (Cth), including the offences introduced in 2024 prohibiting the malicious release of personal information (doxxing). [short name] does not use or release personal information in a manner that would contravene these offences and treats unauthorised disclosure as a serious breach of this Policy.

Related Policies, Risks and Controls
Breach and Incident Reporting
Record Keeping Policy
AI Policy

Consultation processes

For Responsible Person maintaining this within Throughlife Financial Solutions, refer to the Throughlife Financial Solutions Pty Ltd Reference Organisational Sheet.

This policy shall be updated, reviewed or further developed in consultation with the stakeholders of the organisation.

Approvals

This policy is approved for use by the Compliance Committee and takes effect immediately.

Review History

Date	Reviewed By	Changes/Comments
July 2026	GRC Essentials	Privacy and Other Legislation Amendment Act 2024 reforms, including: APP 11 “reasonable steps” uplift (technical and organisational measures, data lifecycle); third party / outsourcing controls; whitelisted overseas jurisdictions under APP 8; the “fair and reasonable” commitment and statutory tort for serious invasions of privacy; expanded OAIC enforcement powers; enhanced ADM transparency disclosures; and references to the Criminal Code doxxing offences.
July 2025	GRC Essentials	Removal of Responsible Persons table and consolidation to one-page separate document. Insert of ADM and Digital ID requirements. Small grammatical changes.
July 2024	GRC Essentials	Additional section covering personal information shared or send to oversee recipients. Minor wording changes and inclusion.
September 2023	GRC Essentials	No changes recommended
January 2022	GRC Essentials	New Policy Set – external compliance rollout to client being undertaken
		For any existing versions of this policy, please refer to GRCPlus