JULY 2026

Privacy Policy

LIPMAN BURGON

This Privacy Policy is issued by Lipman Burgon & Partners Pty Ltd (we, us or our), ABN 81 070 454 787, holder of Australian Financial Services Licence (AFSL) number 234972.

1. We manage personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (APPs) and other applicable Australian laws and regulatory requirements. Our privacy practices are designed to support open and transparent management of personal information and to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.
2. This Privacy Policy applies to Lipman Burgon & Partners Pty Ltd and the personal information we collect, hold, use and disclose.
3. Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable. This may include your name, email address, contact details, financial information and other information relevant to the services we provide.
4. By providing your personal information to us, you acknowledge that we will collect, use and disclose it as described in this Privacy Policy. Where consent is required by law or by our own procedures, including for sensitive information, meeting recordings, identity verification, overseas disclosure or the use of AI-assisted tools, we will seek that consent separately.
5. We may change this Privacy Policy from time to time by publishing changes on our website. Please check our website regularly to ensure that you are aware of any changes.

What personal information do we collect?

6. As a wealth advisory firm, we are subject to legislative and regulatory requirements that require us to obtain and hold detailed personal information about clients. Our ability to provide a comprehensive advice service also depends on obtaining certain personal information about clients and, where relevant, individuals associated with clients.
7. We only collect personal information that is reasonably necessary for our functions and activities, or where collection is required or authorised by law.
8. The information we may collect and hold includes:
   a. identity verification documents, including Australian driver licences, Australian Government-issued identity documents and international passports, collected for identity verification and AML/CTF purposes;
   b. contact information, including name, residential or postal address, email address, telephone number, date of birth and information about dependants or family members;
   c. IP address information and other information generated through digital communications or online engagement forms;
   d. financial information, including bank account details and card details;
   e. details of your financial needs, objectives, risk tolerance and investment preferences;
   f. details of your current financial circumstances, including assets, liabilities, income, expenditure, insurance cover and superannuation;
   g. information about employment history, employment circumstances, family commitments and social security eligibility; and
   h. details of personal, investment and business objectives in the near and longer term.
9. We may collect sensitive information where it is reasonably necessary to provide our services, where you consent, or where collection is required or authorised by law or another APP exception applies. Sensitive information can include health information, genetic information, biometric information, criminal record information, and information about membership of professional or trade associations, religious beliefs, political opinions or other matters treated as sensitive under the Privacy Act.
10. Some sensitive information is usually needed for applications for death, sickness and disability insurance and to manage claims on those products. It may also be relevant for other applications relating to the provision and operation of a financial service or product.

11. We may collect government related identifiers, including tax file numbers, Medicare numbers, driver licence numbers or passport numbers, where required or authorised by law or where reasonably necessary to verify identity. We will not adopt a government related identifier as our own identifier, or use or disclose it, except where permitted under the Privacy Act, the APPs or another applicable law.

12. Our legal and regulatory obligations may require or authorise us to collect sufficient information to provide appropriate advice and comply with obligations under laws including the Corporations Act 2001 (Cth), Australian Securities and Investments Commission Act 2001 (Cth), Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), Taxation Administration Act 1953 (Cth), Superannuation Guarantee (Administration) Act 1992 (Cth), Superannuation (Unclaimed Money and Lost Members) Act 1999 (Cth), and associated regulations. Other laws may also require or authorise us to collect personal information from time to time.

13. If you do not provide the personal information we request, we may not be able to provide you, or the client with which you are associated, with the requested services. In some cases, we may elect to terminate our retainer if we believe we are unable to provide a complete service.

14. You may interact with us anonymously or under a pseudonym where practical. This is not practical for the provision of financial services because client identity must be verified before any financial transaction is implemented and, in some circumstances, identification is required by law. Where you make a general enquiry about a product or service, you are not required to identify yourself.

How do we collect personal information?

15. We will generally collect personal information directly from you, including through face-to-face interviews, telephone calls, mail, email, online client engagement forms, digital communications and other written communications. From time to time, additional or updated personal information may be collected using one or more of these methods.

16. We may also collect personal information from third parties where authorised by you, where required or authorised by law, or where reasonably necessary for us to provide financial services. These third parties may include:

    a. banks or other financial institutions;

    b. fund managers;

    c. superannuation funds;

    d. life insurance companies;

    e. other financial product issuers;

    f. accountants, legal advisers and other professional advisers;

    g. identity verification and AML/CTF screening service providers; and

    h. publicly available registers maintained by the Australian Securities and Investments Commission or other regulatory authorities.

17. We may collect information about you, including where you are not our client but are associated with a client, from that client or from publicly available sources where the information is necessary for us to provide financial services or comply with legal or regulatory obligations.

Purposes for which we collect, hold, use and disclose personal information

18. We collect, hold, use and disclose personal information where reasonably necessary to provide our services, comply with legal and regulatory obligations, manage our business and protect our rights and interests. This includes:
    a. preparing, reviewing and implementing Statements of Advice and other financial advice documents;
    b. making, reviewing and implementing securities, superannuation, life insurance and investment recommendations;
    c. administering changes to your primary adviser or servicing arrangements within our firm;
    d. identifying, controlling and minimising risks to our services;
    e. monitoring suspicious or fraudulent activity in relation to our services;
    f. complying with legal, accounting, security, AML/CTF, audit, AFSL and regulatory requirements;
    g. providing information to representatives, advisers, accountants, lawyers, auditors, insurers, insurance brokers, financiers and other professional advisers where required in the general course of business or in connection with future transactions;
    h. enforcing compliance with our terms of engagement; and
    i. protecting our legal rights and interests, including in connection with legal claims, disputes, compliance, regulatory and audit functions, fraud prevention and data security.
19. We will not use or disclose personal information for a purpose other than the purpose for which it was collected, a related secondary purpose that you would reasonably expect, where you have consented, or where the APPs or another Australian law requires or authorises the use or disclosure.
20. The Commonwealth Government's Document Verification Service (DVS) is a secure national system accessed by Consumer and Business Services (CBS) to verify, or check, documents with the official record holder. approved system. Where we interact with the DVS to verify your identity we will obtain your express consent prior to proceeding.
21. If one of our representatives is a member of a professional industry body, that body may inspect the representative's files to assess compliance with professional standards. This may involve disclosure of personal information. We are also required under the Corporations Act 2001 (Cth) to maintain specified records and make those records available for inspection by the Australian Securities and Investments Commission.
22. We may use personal information to provide direct marketing material, such as articles or updates that may be of interest to you. You may request not to receive direct marketing by contacting us by phone, email or in a face-to-face meeting. We will act on your request promptly.

Use of AI-assisted tools

23. We may use technology-based tools, including AI-assisted systems, to support administrative activities such as meeting note preparation, document management, workflow efficiency and service delivery.
24. We record a meeting only after all participants have been notified and, where required, have consented. Where you consent, the AI system may process the audio recording and generate a text summary, which may contain personal information discussed during the meeting. You may decline recording, or withdraw consent, at any time.
25. Where personal information is used in connection with AI-assisted tools, appropriate security and confidentiality controls are maintained. We do not use your audio or transcripts to train publicly available AI models unless you expressly agree. On request, we will disclose the AI provider we use and the region in which your data is hosted, where practicable.

26. We do not currently use automated systems to make decisions that could reasonably be expected to significantly affect an individual's rights or interests. If this changes, this Privacy Policy will be updated to describe the kinds of personal information used and the kinds of decisions involved.

When we may disclose personal information

27. We may outsource some processes involved in providing financial services or operating our business. These outsourced functions may include paraplanning, compliance assessments, direct marketing, data storage and management, customer support, finance and accounting, IT and cyber security, identity verification and AML/CTF screening.

28. Third-party service providers may require access to personal information to carry out these processes on our behalf. These providers may include technology providers, cloud hosting providers, document management providers, compliance service providers, insurers, auditors, accountants, legal advisers, insurance brokers, financiers and other professional service providers.

29. We may disclose personal information to third-party service providers and professional advisers located in Australia or overseas where reasonably necessary to provide our services or support our business operations. Where personal information is disclosed to an overseas recipient, we take reasonable steps to ensure that personal information is handled in a manner consistent with Australian privacy requirements and the Australian Privacy Principles.

30. The countries in which overseas recipients are likely to be located may include the United States, United Kingdom, New Zealand, Singapore and other jurisdictions used by our technology and service providers from time to time. If it is not practicable to specify each country, we will describe the relevant regions or categories of providers and update this Privacy Policy as appropriate.

31. Where required under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), personal information may be disclosed to identity verification and screening service providers for identity verification and screening against sanctions lists, politically exposed persons registers and adverse media sources. Such disclosures are made in compliance with our obligations under that Act and are subject to appropriate data handling requirements.

32. If your primary adviser or service arrangements within our firm change, your personal information may be transferred internally to the adviser, representative or team that becomes your primary point of contact. It is a condition of our agreement with each of our representatives that they adopt and adhere to this Privacy Policy. If a representative ceases to be associated with us, we will continue to manage your personal information in accordance with this Privacy Policy and applicable law. We will not transfer your personal information to another licensee merely because a representative has moved, unless you have authorised us to do so or we are otherwise permitted or required by law.

Protection of your personal information

33. Personal information is generally held in client files in both hard copy and digital format. Information may also be held in computer databases, locally or cloud-based. Information provided to third parties will be managed in accordance with applicable privacy obligations and the relevant contractual and confidentiality arrangements.

34. We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure. Personal information is treated as confidential and sensitive information is treated as highly confidential. Appropriate security measures are maintained, including technical and organisational measures suitable for the nature of the information and our business operations.

35. If we become aware of a data breach that is likely to result in serious harm, we will assess and respond to it in accordance with the Notifiable Data Breaches scheme under the Privacy Act, including notifying affected individuals and the Office of the Australian Information Commissioner where required.

Access and correction

36. You may request access to personal information that we hold about you and request correction of personal information that is inaccurate, out of date, incomplete, irrelevant or misleading. Requests should be directed to our Privacy Officer using the contact details set out below. We will respond to access and correction requests in accordance with the Privacy Act and the Australian Privacy Principles.
37. We may need to verify your identity before providing access or making corrections. We will seek only the minimum amount of personal information reasonably necessary for identity verification.
38. We will endeavour to ensure that the personal information we hold is up to date and accurate. If you believe any personal information we hold is inaccurate, incomplete, irrelevant, misleading or out of date, you may contact us and provide evidence. If we agree the information requires correction, we will take reasonable steps to correct it. We must retain historical information where needed to support the services we provided at a point in time.
39. If we do not agree that personal information requires correction, we will, if you request, take reasonable steps to ensure that whenever the information is accessed or handled in the future, it is apparent that you are not satisfied with its accuracy or completeness.
40. We will endeavour to respond to access and correction requests within 14 to 30 days, depending on the complexity of the information or request. If your request is urgent, please indicate this clearly.

Data retention and destruction

41. We retain personal information only for as long as reasonably necessary for the purposes for which it was collected, or as required or permitted by law, including financial services, taxation, AML/CTF, insurance, dispute resolution, professional indemnity, audit and limitation-period requirements.
42. Generally, personal information will be retained for the period during which you have an ongoing relationship with us and for at least seven years after that relationship ceases, or for such other period as required or permitted under specific legislation relating to the type of information held, including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth).
43. When personal information is no longer required or permitted to be retained, we take reasonable steps to securely destroy or de-identify it in accordance with our legal and regulatory obligations.

Privacy complaints

44. If you wish to complain about a breach or potential breach of this Privacy Policy or the Australian Privacy Principles, please contact us and request that the complaint be directed to the Privacy Officer. We will acknowledge privacy complaints promptly and seek to resolve them as quickly as practicable. We will generally aim to provide a written response within 30 days.
45. If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner at Phone: 1300 363 992 or oaic.gov.au. Where your complaint also relates to financial services, you may also have rights to refer the matter to our external dispute resolution scheme, if applicable.

Contact Us

Privacy enquiries, access requests, correction requests and privacy complaints should be directed to:

Privacy officer	Lipman Burgon & Partners Pty Ltd
Postal address	Level 2, 14 Martin Place, Sydney NSW 2000
Telephone	+61 2 9230 9600
Email	private.advisers@lipmanburgon.com.au
Web	lipmanburgon.com.au

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