



LOCUMSGROUP

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ACCOUNTANTS FINANCIAL ADVISERS MORTGAGE CENTRE

FINANCIAL SERVICES GUIDE  
VERSION 1.1/ 4 April 2024

Locumsgroup Asset Management Pty Ltd Australian Financial Services Licence No. 339567  
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## THE FINANCIAL SERVICES GUIDE

**The Financial Services Guide (“FSG”) outlines your rights as a client and our obligations and responsibilities as advisers. You have the right to ask us about our charges, the type of advice we will provide you, and what you can do if you have a complaint about our services.**

**This FSG is intended to inform you of certain basic matters relating to our relationship, prior to us providing you with a financial service.**

Key information in the FSG is set out in the answers to questions below. The matters covered by the FSG include the following:

- Who we are
- How can we be contacted
- How we (and any other relevant parties) are remunerated
- What services we are authorised to provide to you
- Details of any potential conflicts of interest
- Details of our internal and external dispute resolution procedures, along with how you can access them

The FSG document also contains the following:

- Adviser Profile
- Terms of Business
- Outline of Fees and Charges
- Privacy Policy

It is intended that this FSG should assist you in determining whether to use any of the services described in this document.

You should also be aware that you are entitled to receive a Statement of Advice whenever we provide you with any advice, which takes into account your objectives, financial situation and needs. The Statement of Advice (SoA) will contain the advice; the basis on which it is given; and information about fees, commissions and associations which may have influenced the provision of the advice.

If our representative provides further advice to you and we do not give that further advice to you in writing you may request a copy of the Record of Advice (RoA) at any time up to 7 years from the date our representative gave that advice to you. You can request the record of the advice by contacting the representative or us in writing or by telephone or by email.

In the event we make a recommendation to acquire a particular financial product, we must also provide you with a Product Disclosure Statement containing information about the particular product, which will enable you to make an informed decision in relation to the acquisition of that product.

## 1.1 BEFORE YOU READ OUR ADVICE

### 1.1.1 WHO WILL BE PROVIDING THE FINANCIAL SERVICE TO ME?

#### LICENSEE

**Locumsgroup Asset Management Pty Limited**  
 ABN 71 113 009 626  
 Australian Financial Services  
 Licence Number: 339567

#### BUSINESS ADDRESS

Level 4, 8 Spring Street, Sydney NSW 2000

#### POSTAL ADDRESS

PO Box R242, Royal Exchange, NSW 1225

T. 02 9255 8888

F. 02 9247 2868

E. info@locumsgroup.com.au

### 1.1.2 WHO IS MY ADVISER?

Your adviser will be a Representative employed by Locumsgroup Asset Management Pty Limited. See enclosure **'Adviser Profile'**.

#### LACK OF INDEPENDENCE

Locumsgroup Asset Management Pty Ltd is not independent, impartial, or unbiased because we:

Receive commissions for the advice that we provide on life risk insurance products when our clients establish such insurance products on our recommendation.

### 1.1.3 WHAT KINDS OF FINANCIAL SERVICES ARE YOU AUTHORISED TO PROVIDE ME AND WHAT KIND OF PRODUCTS DO THOSE SERVICES RELATE TO?

Locumsgroup Asset Management Pty Limited ("Locumsgroup") can *offer* you the following advice and services:

- Investment strategies for wealth creation
- Investment strategies for preserving lifestyle in retirement
- Strategies for legally minimising taxation of superannuation and retirement benefits
- Investment of retrenchment proceeds
- Regular savings and investment programs

- Advice on shares, listed property trusts and listed investment companies
- Whether to borrow money to invest, or for other purposes, and what to invest in
- Strategies for maximising Social Security
- Tax effective Estate Planning
- Term, Income Protection, and Trauma Insurance
- Business Succession Planning
- Reviews of Investment Portfolios

Locumsgroup Asset Management Pty Limited is authorised to offer you the following services:

- a) Financial product advice and to deal in a financial product by arranging for a financial product to be acquired, disposed of, or varied.
- b) Provide advice and/or deal in the following products:
  - Deposit products
  - Managed Investment Schemes
  - Life Insurance Risk Products
  - Government Debentures, Stocks & Bonds
  - Asset Management
  - General Insurance
  - Retirement Savings Account Products, and Superannuation
  - Life Insurance Investment Products
  - Margin loans
  - Securities

#### PORTFOLIO MONITORING

Internal databases are maintained detailing clients' investments as recommended by Locumsgroup Asset Management Pty Limited. This does not constitute portfolio monitoring. Portfolios are reviewed on an annual basis, subject to the client's discretion.

Locumsgroup Asset Management Pty Limited financial advisers usually provide specific advice tailored to your individual circumstances, but can also provide general advice only, where you are ultimately responsible for any specific strategies and products you may subsequently use. Locumsgroup Asset Management Pty Limited advisers provide an advisory service.

Locumsgroup Asset Management Pty Limited can help you manage your wealth by providing a full range of effective investment strategies and financial services. Using investment-expertise

developed by academics at the University of Chicago, Booth School of Business who were awarded the Nobel Prize for economic science. Our portfolio recommendations are focused on meeting your specific needs based on economic, financial and investment research. You will benefit from sound advice, prudent investment management, and personal service.

### SOUND ADVICE AND PERSONAL SERVICE

The core Locumsgroup service is wealth management. Combining excellence in:

- investment portfolio construction and maintenance.
- financial advice.
- tax and accounting; and
- personal risk management solutions.

By these means - we help our clients grow their wealth to achieve financial independence. We personalise our service-offering to suit your individual requirements.

We rely on local and international expertise. Our recommendations are based on: economic science, sound investment research, prudent investment management, and personal service aimed to meet your specific needs.

### YOUR FINANCIAL FUTURE

Achieving a degree of financial independence and reaching your financial goals cannot occur without organisation and discipline. We start by identifying your financial objectives are; then determine a clear time frame for their achievement. You should have a good idea of how your objectives will be achieved and be organised to put your plans into action and monitor progress.

Using a tested and proven methodology developed to provide effective financial management advice, we can assist you in:

- clarifying your objectives in the development of your financial strategy
- developing a long-term strategic outlook
- the implementation of your plan, and,
- providing ongoing monitoring to make sure that you stay on track

Our advice takes into account: taxation, risk management, personal needs, social security, estate planning, and any additional requirements which improve the chances of you reaching your financial goals.

### PORTFOLIO STRUCTURE AND REFINEMENT

The construction of a portfolio requires particular attention to the type of investments selected as well as the specific assets selected may include investments in shares and real estate as well as deposit products and managed investments. The objective is to combine the most appropriate blend of assets for a diversified portfolio.

We aim to assist our clients in building and managing wealth with more security and less volatility. The process is implemented efficiently and cost-effectively.

### PERSONAL RISK MANAGEMENT (INSURANCE)

This is a foundation principal of your financial management arrangements. The first step is determining the appropriate level of insurance and then selecting the appropriate arrangements at an affordable cost. Our team can provide advice on insurance arrangements underwritten through a number of Australia's largest insurers to ensure that the best policies are selected to meet your needs.

### SUPERANNUATION

Our superannuation specialists can assist you in choosing the best investment, insurance and administrative options to meet your business or personal superannuation requirements including: self-managed funds, public offer funds, wrap accounts and corporate superannuation funds. All backed with sound advice, personal service, industry experience and market leading research.

### SUPERANNUATION FUND SERVICE

Operating your own Self-managed Superannuation Fund (SMSF) can be an onerous task. We provide expertise to help clients establish a fund and assist with the ongoing compliance requirements.

#### 1.1.4 HOW WILL I PAY FOR THE SERVICE?

Locumsgroup Asset Management Pty Limited operates on a combination of fee-for-service basis for investment advice and placement; tax advice; and structuring advice. Fees will be charged at the rate detailed at point 2.2 of this Financial Services Guide or as disclosed in the Client Agreement.

Where we recommend a life insurance product, we accept a commission which is paid by the life insurance company.

Locumsgroup Asset Management Pty Limited may receive commissions from the issuers of the life insurance products approved by Locumsgroup Asset Management Pty Limited that we recommend, and these will be fully disclosed to you in the Statement of Advice that accompanies the recommendation.

### 1.1.5 DO YOU RECEIVE REMUNERATION, COMMISSION, FEES OR OTHER BENEFITS IN RELATION TO PROVIDING THE FINANCIAL SERVICES TO ME AND HOW IS THAT COMMISSION CALCULATED?

- a) Employee Representatives receive a salary from Locumsgroup Asset Management Pty Limited. Authorised Representatives are paid a percentage of commissions and fees. Locumsgroup Asset Management Pty Limited does not have any Authorised Representatives.
- b) Where a life insurance company product has been recommended the issuer of the product will pay Locumsgroup Asset Management Pty Limited a commission. This commission ranges between 0% and 66% of your first year's premium.
- c) Where a life insurance company product has been recommended the issuer of the product may pay Locumsgroup Asset Management Pty Limited an ongoing commission. This commission, which can vary depending on the insurance product, is calculated in a range of between 0% and 22%. This commission may be paid either each month, quarter, half year or annually.
- d) For example: If your first year's premium was \$1500 Locumsgroup could receive \$990 initial commission and if your premium was \$1500 for the second and subsequent years, Locumsgroup Asset Management Pty Ltd could receive \$330.

- e) In cases where the services of a stockbroker are utilised to deal in shares the licensee may receive between 0% and 50% of the brokerage amount paid to the stockbroker.
- f) Locumsgroup Asset Management Pty Limited may be entitled to a bonus as the licensee based on income generated by me. At this time I am not aware if it will receive that bonus. I am not aware of any other incentive that may be received from the licensee or any product issuer.
- g) If you have been referred to me by another party Locumsgroup Asset Management Pty Ltd may pay that party a fee between \$1 and \$250.
- h) The exact amounts of any fees, commissions, bonuses or other incentives received by Locumsgroup Asset Management Pty Limited, the licensee will be included in a Statement of Advice that we will provide to you.
- i) Statement of Advice preparation fee: \$2,000 - \$10,000 depending on the complexity of the advice required.
- j) The cost of our ongoing financial advice service is charged at 1.00% of your investment value plus GST.

For example:

If your investment value is \$500,000 the percentage charged will be 1.00% being \$5,000

We will advise you of the services that we will provide for this fee.

**K) WE MAY CHARGE FOR ADDITIONAL SERVICES THAT ARE NOT INCLUDED IN THE ONGOING FINANCIAL ADVICE SERVICE FEE. THOSE FEES ARE DETAILED IN 'OUR FEES' – SECTION 2.2 OF THE 'TERMS OF BUSINESS AND FEES' SECTION OF THIS FSG.**

### 1.1.6 WHO DO YOU ACT FOR WHEN YOU PROVIDE FINANCIAL SERVICES FOR ME?

Locumsgroup Asset Management Pty Limited acts for you the client and is responsible for the financial services provided to you.

**1.1.7 DO ANY RELATIONSHIPS OR ASSOCIATIONS EXIST WHICH MIGHT INFLUENCE YOU IN PROVIDING ME WITH FINANCIAL SERVICES?**

Neither Locumsgroup Asset Management Pty Limited, any of its authorised and employee representatives, nor any related bodies corporate have any relationships or association with any issuer of managed funds, master trust, wrap accounts or direct equities that could be expected to influence us in the provision of the financial services.

**1.2 WHEN YOU RECEIVE OUR ADVICE**

**1.2.1 WILL YOU PROVIDE ME ADVICE WHICH IS SUITABLE TO MY NEEDS AND FINANCIAL CIRCUMSTANCES?**

Yes. But to do so we need to find out your individual objectives, financial situation and needs before we recommend any financial products or services to you.

You have the right to not divulge this information to us, if you do not wish to do so.

In that case, we are required to warn you about the possible consequences of us not having your full personal information. You should read the warnings carefully.

**1.2.2 WHAT SHOULD I KNOW ABOUT THE RISKS OF THE FINANCIAL PRODUCTS OR STRATEGIES YOU RECOMMEND TO ME?**

We will explain to you any significant risks of financial products and strategies which we recommend to you. If we do not do so, you should ask us to explain those risks to you.

**1.2.3 WHAT INFORMATION DO YOU MAINTAIN IN MY FILE, AND CAN I EXAMINE MY FILE?**

We maintain a record of your personal profile, which includes details of your objectives, financial situation and needs. We also maintain records of any recommendations made to you.

We are committed to implementing and promoting a privacy policy which will ensure the privacy and security of your personal information. A copy of our privacy policy is enclosed for your information.

**1.2.4** If you wish to examine your file, we ask that you make a request in writing and allow up to fourteen (14) working days for the information to be forwarded.

We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing, and copying any material requested. If the information sought is extensive, we will advise of the likely cost in advance and can help to refine your request if required.

**1.2.5 CAN I PROVIDE YOU WITH INSTRUCTIONS AND TELL YOU HOW I WISH TO INSTRUCT YOU TO BUY OR SELL MY FINANCIAL PRODUCTS?**

Yes. You may specify how you would like to give us instructions, for example by telephone, fax, or other means.

**1.3 IF YOU HAVE ANY COMPLAINTS**

**1.3.1 WHO CAN I COMPLAIN TO IF I HAVE A COMPLAINT ABOUT THE PROVISION OF THE FINANCIAL SERVICES (INCLUDING GENERAL INSURANCE) TO ME?**

Locumsgroup Asset Management Pty Limited is a member of the Australian Financial Complaints Authority ('AFCA'). If you have any complaints about the service provided to you, you should take the following steps:

- a) Contact us and tell us about your complaint:

**BUSINESS ADDRESS**

Level 4, 8 Spring Street, Sydney NSW 2000

**POSTAL ADDRESS**

PO Box R242, Royal Exchange, NSW 1225

T. 02 9255 8888

F. 02 9247 2868

E. [info@locumsgroup.com.au](mailto:info@locumsgroup.com.au)

- b) If your complaint is not satisfactorily resolved within 3 business days, please contact the Manager of Locumsgroup Asset Management Pty Limited or put your complaint in writing and send it to PO Box R242, Royal Exchange NSW 1225.

We will seek to resolve your complaint quickly and fairly.

- c) If the complaint cannot be resolved to your satisfaction, after 30 days you have the right to complain to AFCA. This service is provided to you free of charge.

AFCA's contact details are;

- *GPO Box 3, Melbourne, Victoria, 3001*
- *Phone: 1800 931 678*
- *Email: [info@afca.org.au](mailto:info@afca.org.au)*
- *Website: [www.afca.org.au](http://www.afca.org.au)*

The Australian Securities & Investments Commission ('ASIC') also has a Freecall info-line on 1300 300 630 which you may use to make a complaint and or obtain information about your rights.

Locumsgroup Asset Management Pty Limited has in place Professional Indemnity Insurance that is required by the Corporations Act and which meets ASIC's requirements and covers present and past representatives.



## TERMS OF BUSINESS AND FEES

**Thank you for engaging Locumsgroup Asset Management Pty Limited (ABN: 71 113 009 626) (hereafter referred to as Locumsgroup) to assist you with your financial affairs. We wish to set out the basis on which the staff and principals of Locumsgroup will carry out your work, what our charges are, and certain other information.**

### 2.1 THE WORK THAT WE DO

Locumsgroup will assist you in all aspects of your financial affairs. Including but not restricted to, the integration of your financial affairs to ensure a tax efficient operational structure. Key areas covered are: wealth creation planning, taxation-planning, the selection of appropriate ownership entities, risk management strategies, borrowing and debt management structures; and advice on asset-weighting across appropriate asset classes.

From time to time we may email you information about financial services available and the services of associated businesses.

### 2.2 OUR FEES

In addition to the services provided under our 'Ongoing Financial Advice Service Fee', we may charge an hourly rate for a service not covered by the 'Ongoing Financial Advice Service Fee'. The hourly rate for these consulting and advice services (excluding GST) per adviser is:

**PARTNER/DIRECTOR**

\$450.00 per hour

**SENIOR ADVISER**

\$300.00 per hour

**PORTFOLIO MANAGER**

\$200.00 per hour

### 2.3 FEES AND EXPENSES

We may need to pay out money on your behalf. Examples of such expenses are search fees, registration fees, lodgement fees, incorporation fees, valuation fees and lenders legal fees. You will have to reimburse us for these expenses. Photocopying and facsimile transmissions will not be charged. Our estimate of total fees and expenses is based on the time we expect your work to take. If at any time it looks like we will exceed our time estimate, we will provide a new estimate to you and get your approval before proceeding further.

Payment terms will be as itemised on invoices forwarded to you for work that you have instructed us to perform. Payment may also be made to our firm directly from the investments that we arrange for you. These payments will all be disclosed to you by us.

### 2.4 WHO DOES THE WORK?

Either a partner of the firm, or employed advisory staff of Locumsgroup will complete your work.

If we need to engage the services of other advisors e.g.: solicitors, or tax specialists, we will consult you before we engage these specialists and advise of costs associated with such an engagement.

You must provide us with accurate and complete information and tell us about all significant changes in your personal and financial circumstances.

### 2.5 ACCOUNTS

You must pay our account within 14 days of issue.

## 2.6 TERMINATING OUR SERVICES

You may terminate our services at any time by advising us in writing. In that case we will issue an account for work performed up to that time. In the case of any work being done for a fixed price, a pro-rata amount will be payable based on the amount of work done. We will not continue to do your work if you do not give us proper instructions, or if you fail to pay us money on account of fees and expenses paid on your behalf when required.

## 2.7 HOLDING DOCUMENTS

Once your work is complete, any file that you leave with us will be kept for seven years after the date of our final account. After that time, we have the right to destroy the file. This does not include any safe custody documents which are held subject to your instructions. Whether or not your work is complete we may retain your files, and any documents you give us to do your work, if you have not paid our accounts.

You authorise us to disclose your appropriate information to other sources when necessary.

## 2.8 TAX AND ACCOUNTING SERVICES

As part of our integrated service offering, we may also introduce you to Locumsgroup Private Accounting Services Pty Limited ('LPAS') for assistance with tax and accounting services. LPAS is a Registered Tax Agent.

LPAS will charge for accounting services that are provided to you and the cost of these accounting services will be disclosed to you in advance by LPAS in the LPAS Terms of Engagement.

LPAS is 100% owned by the shareholders of Locumsgroup.

The owners of Locumsgroup may receive a dividend from LPAS.

## 2.10 MORTGAGE FINANCE

Once again, as part of our integrated service offering, we may introduce you to Locums Nominees Pty Limited ('Locums Nominees') for assistance with the arrangement of mortgage

finance. Locums Nominees has been granted an Australian Credit Licence by the Australian Securities and Investments Commission.

If Locums Nominees receives a commission from a lender following the arrangement of mortgage finance on your behalf, that commission will be disclosed to you by Locums Nominees.

Locums Nominees is 100% owned by the shareholders of Locumsgroup.

The shareholders of Locumsgroup may receive a dividend from Locums Nominees Pty Limited.

## 2.10 GOODS AND SERVICES TAX

Where work performed or expenses incurred are subject to GST, the amount referred to in these terms is net of GST and you are required to pay, in addition to our fees and expenses, GST on those amounts.

## ADVISOR PROFILE



**Paul Ahearne is the Managing Partner of the Locumsgroup group of companies and has worked in the financial services industry for over three decades.**

As the managing partner of Locumsgroup, Paul Ahearne is responsible for the organisation of clients' tax-planning and financial affairs; and the provision of advice on strategies, from inception to completion, to achieve long-term financial goals.

Principle areas of review are the implementation of tax-planning, wealth creation, and wealth management strategies. Outcomes are achieved through the analysis of investment options across all asset classes; consideration of tax efficiency; the establishment of appropriate risk management structures; and estate planning.

In addition to being the principal of Locumsgroup, Paul has extensive executive-training experience: he has spoken at a number of international conferences and conducted and lead training workshops.

While completing his MBA, Paul was selected to represent his university at an international strategic planning competition.

Paul is an active athlete and competed at an elite level in sport in his early 20s. In more recent times, he ran the New York Marathon for charity.

### PAUL AHEARNE

MBA., Grad.Dip.Man., Dip. FP., MIPA, FAICD  
MANAGING DIRECTOR

### LICENSEE

Locumsgroup Asset Management Pty Limited

### AUSTRALIAN FINANCIAL SERVICES LICENCE

ASFL No. 339567

Authorised Representative Number: 1001261

### BUSINESS ADDRESS

Level 4, 8 Spring Street, Sydney NSW 2000

T. + 61 2 9255 8844

F. + 61 2 9247 2868

M. + 61 405 172 888

E. [pahearne@locumsgroup.com.au](mailto:pahearne@locumsgroup.com.au)

w. [www.locumsgroup.com.au](http://www.locumsgroup.com.au)

Paul holds the following academic qualifications, Fellowships, and Associateships:

- Master of Business Administration
- Graduate Diploma in Management
- Graduate Certificate in Business
- Diploma in Financial Planning
- Member of the Institute of Public Accountants
- Fellow of the Institute of Company Directors
- Cert IV Financial Services (Finance/Mortgage Broking)
- Member of the St James Ethics Centre
- Member of the Economic Society of Australia
- Associate of the Mortgage and Finance Association of Australia
- Affiliate Member: The Tax Institute
- Member: The Sydney Institute
- Member: The Lansdowne Club
- Chevalier: *Confrerie du Tastevin*
- Sponsor: Room to Read®
- Sponsor: Balunu Foundation

FURTHER INFORMATION ON PAUL AHEARNE IS AVAILABLE AT [WWW.LINKEDIN.COM](http://WWW.LINKEDIN.COM)



## ADVISOR PROFILE



**Andrew Onishe is a Financial Adviser at Locums Group and began work in the financial services industry in 2010.**

Andrew previously held roles at Dimensional Fund Advisors (a US based Fund Manager) and Myer Family Company (a Wealth Management and Multi Family Office firm).

Andrew has worked in a variety of areas within accounting, taxation, financial advice, and investment management, with a passion for helping clients to achieve their financial goals by implementing sound strategic advice.

Andrew brings a wealth of knowledge and experience to achieve optimal outcomes for his clients.

Andrew is a Chartered Accountant and obtained academic qualifications including a Bachelor of Commerce (Accounting), a Graduate Diploma of Financial Planning, and a Graduate Diploma of Chartered Accounting (CA)

When not assisting clients to reach their financial management objectives Andrew enjoys spending time with his young family.

### ANDREW ONISHE

BCom., CA., Grad. Dip. FP  
FINANCIAL ADVISER

### LICENSEE

Locumsgroup Asset Management Pty Limited

### AUSTRALIAN FINANCIAL SERVICES LICENCE

ASFL No. 339567

Authorised Representative Number: 1294558

### BUSINESS ADDRESS

Level 4, 8 Spring Street, Sydney NSW 2000

T. + 61 2 9255 8840

M. + 61 421 023 541

E. [aonisihe@locumsgroup.com.au](mailto:aonisihe@locumsgroup.com.au)

W. [www.locumsgroup.com.au](http://www.locumsgroup.com.au)

Andrew holds the following academic qualifications, Fellowships, and Associateships:

- Bachelor of Commerce
- Graduate Diploma in Financial Planning
- Diploma in Financial Planning
- Graduate Certificate of Chartered Accounting
- Member of the Chartered Accountants Australia and New Zealand

FURTHER INFORMATION ON ANDREW ONISHE IS AVAILABLE AT [WWW.LINKEDIN.COM](http://WWW.LINKEDIN.COM)



## PRIVACY POLICY

When you trust us with your personal information, you expect us to protect it and keep it safe.

We are bound by the Privacy Act 1988 (Cth) ('Privacy Act') and will protect your personal information in accordance with the Australian Privacy Principles. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

### ABOUT THIS POLICY

This privacy policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

### WHAT IS PERSONAL INFORMATION?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information. The information or opinion will still be personal information whether it is true or not and regardless of whether we have kept a record of it.

The information that we seek to collect about you will depend on the products or services that we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services effectively.

### WHAT KINDS OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

When you apply for our 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.

If you apply for insurance, we may collect information about what is being insured, the beneficiaries, and your health and financial situation, depending on the type of insurance.

Throughout the life of our service, we may collect and hold additional personal information about you.

The collection of sensitive information is restricted by the Privacy Act. This includes information about your religion, racial or ethnic origin, political opinions, criminal record, and sexual orientation. It also includes health information and biometric information.

Generally, we only collect this sort of information if it is necessary to provide you with a specific product or service and you have consented to that collection. For example, we may collect health information about you to process a claim under an insurance policy.

### FOR WHAT PURPOSES DO WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION?

The main reason we collect, use, hold and disclose personal information is to provide you with services. This includes:

- checking whether you are eligible for the product or service;
- assisting you where online applications are not completed;
- providing the service; and
- helping manage the service.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business. We may also use your information to tell you about products or services we think may interest you.

## HOW DO WE COLLECT PERSONAL INFORMATION?

We collect most personal information directly from you. For example, we will collect your personal information when you apply for or use a product or service or talk to us in person or on the phone.

We also collect information from you electronically. For instance, when you visit our website or complete issued questionnaires.

Sometimes we collect personal information about you from other people or organisations. This may happen without your direct involvement. For instance, we may collect personal information about you from:

- publicly available sources of information, such as public registers;
- your representatives (including your legal adviser, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- commercial information service providers, such as companies that provide fraud prevention reports; and
- insurers, re-insurers, and health care providers.

## WHAT LAWS REQUIRE OR AUTHORISE US TO COLLECT PERSONAL INFORMATION?

We are required or authorised to collect:

- certain identification information about you by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1);
- your Tax File Number, if you choose to provide it, by the Income Tax Assessment Act 1936 (Cth); and
- certain information in relation to your application if you have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth.).

## HOW DO WE HOLD PERSONAL INFORMATION?

Much of the information we hold about you will be stored electronically in secure data centres which are located in Australia and owned by either the Locumsgroup or external service providers. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold.

For example:

- access to information systems is controlled through identity and access management;
- employees are bound by internal information security policies and are required to keep information secure;
- all employees are required to complete training about information security; and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy or permanently de-identify any personal information after it can no longer be used.

## WHO DO WE DISCLOSE YOUR PERSONAL INFORMATION TO, AND WHY?

We may also provide personal information about our customers to organisations outside Locumsgroup. To protect personal information, we only commence engagements with product providers who also have strong privacy policies and comply with the Privacy Act.

Generally, we disclose personal information to organisations that help us with our business and supply provided products and services. These may include:

- authorised representatives and credit representatives who sell products and services to us and on our behalf;
- insurers, re-insurers and health care providers;
- payment systems operators (for example, merchants receiving card payments);

- other financial services organisations, including banks, superannuation funds, stockbrokers, custodians, fund managers and portfolio service providers;
- debt collectors;
- our financial advisers, mortgage managers, accountants, legal advisers or auditors;
- your representatives (including your legal adviser, accountant, mortgage broker, financial adviser, executor, administrator, guardian, trustee, or attorney);
- fraud bureaus or other organisations to identify, investigate or prevent fraud or other misconduct;
- external dispute resolution schemes; and
- regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside Locumsgroup where:

- we are required or authorised by law or where we have a public duty to do so;
- you may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances; or
- we are otherwise permitted to disclose the information under the Privacy Act.

#### DO WE USE OR DISCLOSE PERSONAL INFORMATION FOR MARKETING?

We will use your personal information to offer you services we believe may interest you, but we will not do so if you tell us not to. These products and services may be offered by a member of Locumsgroup. We may offer you products and services by various means, including by mail, telephone, email, SMS or other electronic means, such as through social media or targeted advertising through Locumsgroup.

If you don't want to receive marketing offers from us please contact us.

#### DO WE COLLECT PERSONAL INFORMATION ELECTRONICALLY?

We may collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use.

Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question about your finances.

You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

#### ACCESS TO AND CORRECTION OF PERSONAL INFORMATION

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee for requesting that your personal information is corrected or for us to make corrections.

If we refuse to give you access to or to correct your personal information we will give you a notice explaining our reasons except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.



### RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS – YOUR RIGHTS

If you are concerned about how your personal information is being handled or if you have a complaint about a breach by us of the Australian Privacy Principles, please contact us.

We will acknowledge your complaint as soon as we can after receipt of your complaint. We will let you know if we need any further information from you to resolve your complaint.

We aim to resolve complaints as quickly as possible. We strive to resolve complaints within five business days but some complaints take longer to resolve. If your complaint is taking longer, we will let you know what is happening and a date by which you can reasonably expect a response.

If you are unhappy with our response, there are other bodies you can go to.

### OFFICE OF THE AUSTRALIAN INFORMATION COMMISSIONER

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at  
GPO Box 5218  
Sydney NSW 2001  
Phone: 1300 363 992  
Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)

### CONTACT US

You can contact us by:

- calling Locumsgroup on 02 9255 8888
- emailing [info@locumsgroup.com.au](mailto:info@locumsgroup.com.au)
- visiting [www.locumsgroup.com.au](http://www.locumsgroup.com.au)
- writing to us at:  
Locumsgroup  
PO Box R242  
ROYAL EXCHANGE NSW 1225.

### CHANGES TO THE PRIVACY POLICY

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy. An up-to-date version is available on request, by contacting us using the details above.

### FOR MORE INFORMATION

- Call: 02 9255 8888
- Visit: [www.locumsgroup.com.au](http://www.locumsgroup.com.au)
- Mail:  
Locumsgroup  
PO Box R242  
ROYAL EXCHANGE NSW 1225







