



Financial Services Guide

Version 2

Date: 01 July 2021

Important Information

Financial Services Guide

This Financial Services Guide (FSG), is designed to clarify who we are and what we do, and to help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we're able to offer you;
- how we and our associates are paid and – any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it's full of useful information – and is also worth holding on to for future reference. The Privacy Notification on page 13 is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us.

Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written Statement of Advice (SOA). This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time you receive further financial advice from us, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting us any time up to seven years from the date of the advice provided. Please refer to the '**Contact us**' section of this FSG for our contact details.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

Giving us instructions

If you want to make changes to your financial plan or provide other instructions, please contact us. Please refer to the '**Contact us**' section of this FSG for our contact details.

Generally, you will need to give us instructions in writing (e.g. fax, email or letter) or another method agreed with us.

Not Independent

Godfrey Pembroke Group Pty Ltd (**Godfrey Pembroke**) is a wholly owned subsidiary of IOOF Holdings Limited ABN 49 100 103 722 ("**IOOF**") and is part of the IOOF group of companies ("**IOOF Group**"). The IOOF Group is an issuer of financial products, some of which are included in our Approved Product List (APL). In addition, we may receive commission on life insurance products as explained in the '**How we charge for our services**' section. For these reasons, we are not able to refer to ourselves or our advice as 'independent', 'impartial' or 'unbiased'.

About Us

Who we are

The following financial advice specialists are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you:

Anthony (Tony) Joseph Brosnan

Hayden Elliott Shaw

Authorised Representative No. 241871

Authorised Representative No. 1268933

The Financial Services that the above financial advice specialists offer are provided by SA Portfolio Planners Pty Ltd ABN 49 008 163 522, trading as First Principles Financial Planning, Authorised Representative (AR) No. 242050

Your financial advice specialists are Representatives of and offer services on behalf of Godfrey Pembroke.

Godfrey Pembroke has authorised your advisers to provide you with this Financial Services Guide.

About Godfrey Pembroke Group Pty Ltd

At Godfrey Pembroke Group Pty Ltd (Godfrey Pembroke) we pride ourselves on providing a comprehensive range of financial advice services. Our network of self-employed advisers bring specialist expertise, and they understand intimately how to manage complexity. The Godfrey Pembroke history is underpinned by unparalleled customer service and personal attention to our clients' needs.

Founded in 1981, Godfrey Pembroke is a network of self-employed financial advice specialists who have a long history of leading the industry in professionalism, trust and transparency. Our goal has remained the same – to provide high quality financial advice to help create, grow and protect our clients' wealth.

With a focus on the value of relationships and a deep expertise in addressing complex financial needs, Godfrey Pembroke continues to support advisers and advice businesses within their network as they deliver quality advice outcomes for advice clients.

Our advisers are representatives of Godfrey Pembroke Group Pty Ltd ABN 38 078 629 973 Australian Financial Services Licensee 245451, of The Bond, Level 3, 30 Hickson Road, Millers Point NSW 2000

Our associations and relationships

Godfrey Pembroke is a subsidiary of the IOOF Group. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC's Money Smart website (www.moneysmart.gov.au/investing/financial-advice).

Godfrey Pembroke financial advisers are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

We may recommend financial services and products issued, managed, or administered by companies within the IOOF Group or companies in which a shareholding is maintained by an IOOF Group member.

These include products and services issued, managed or operated by the following entities:

- MLC Investments Limited ABN 30 022 641 661 AFSL 230705 (branding includes 'Private Investment Consulting')
- JANA Investment Advisers Pty Ltd ABN 97 006 717 568 AFSL 230693
- NULIS Nominees (Australia) Limited ABN 80 008 515 633 AFSL 236465 as trustee for the MLC Super Fund ABN 70 732 426 024, and as trustee for the MLC Superannuation Fund ABN 40 022 701 955 (branding includes 'MLC' and 'Plum')
- Navigator Australia Limited ABN 45 006 302 987 AFSL 236466 (branding includes 'Pre Select Funds')
- Australian Executor Trustees Limited ABN 84 007 869 794 AFSL 240023
- IOOF Investment Services Limited ABN 80 007 350 405 AFSL 230703
- IOOF Investment Management Limited ABN 53 006 695 021 AFSL 230524
- IOOF Limited ABN 21 087 649 625 AFSL 230522
- Managed Portfolio Services Limited ABN 77 009 549 697 AFSL 233761
- OnePath Funds Management Limited ABN 21 003 002 800 AFSL 238342
- OnePath Custodians Pty Limited ABN 12 008 508 496 AFSL 238346
- Oasis Fund Management Limited ABN 38 106 045 050 AFSL 274331
- Antares Capital Partners Ltd ABN 85 066 081 114 AFSL 234483 (this includes as the issuer of the 'Altrinsic Global Equities Trust' co-branded 'Altrinsic Global Advisers' and 'a partner of MLC Asset Management')
- Fairview Equity Partners Pty Ltd ABN 45 131 426 938 AFSL 329052
- Intermede Investment Partners Limited ABN 89 562 707 527
- MLC Asset Management Services Limited ABN 44 106 427 472
- Presima Inc

If we recommend a product or service issued by an IOOF Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information.

We generally recommend products that are listed on Godfrey Pembroke's approved product list. These will include IOOF Group products, and products issued by National Australia Bank Limited and its related entities (NAB). We were previously authorised by a company in the NAB Group. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances, then we may recommend a product outside of this list.

At all times, we will ensure that our recommendations are in your best interests.

IOOF does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by Godfrey Pembroke or its authorised representatives.

IOOF and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402 (MLC Limited) and OnePath Life Limited ABN 33 009 657 176 (OnePath Life). MLC Limited is part of the Nippon Life Insurance Group and OnePath Life is part of the Zurich Financial Services Group. MLC Limited and OnePath Life are not part of the IOOF Group.

What we do

We are authorised by Godfrey Pembroke to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

and to provide advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Superannuation
- Retirement Savings Accounts
- Securities
- Standard Margin Lending Facilities

Contact us

For more information on anything you have read in this document or if there is anything else we can help you with, please contact us at:

Address	Level 8 420 King William Street Adelaide SA 5000
Postal Address	PO Box 3016 Melbourne Street North Adelaide SA 5006
Phone	08 8456 9020
Email	Adelaide@FirstPrinciplesFP.com.au

Your confidence in our advice

Your satisfaction is of paramount importance to us and we have procedures in place to resolve any concerns promptly, and fairly.

Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial adviser know so we can act on it immediately.
2. If your adviser has not satisfactorily resolved your complaint, please contact Godfrey Pembroke on 1800 242 835.

If after speaking to us or your financial adviser, your complaint is not resolved within five (5) business days, please write to:

Complaints Officer
Godfrey Pembroke Group Pty Ltd
Locked Bag 4004
Queen Victoria Building NSW 1230

3. If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):

Website: www.afca.org.au

Email: info@afca.org.au

Telephone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority
GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Godfrey Pembroke holds professional indemnity insurance that satisfies the requirements of section 912B of the Corporations Act. This insurance also covers the conduct of financial advice specialists who were authorised by us at the time of your complaint but are no longer representatives of Godfrey Pembroke.

Payments and benefits we receive

At Godfrey Pembroke, you can pay for the services you receive on a fee for services and advice basis.

At Godfrey Pembroke we believe you deserve transparency and we want to ensure all our recommendations are driven by your needs alone. This is why Godfrey Pembroke has led the industry in implementing a fee-for-advice model (back in 2006), and we will continue to do so. This model allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based on:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- by direct invoice from us for initial and ongoing advice;
- in some circumstances, where possible, as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- where applicable, we may be paid a commission by the financial product issuer(s);
- where applicable, via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the insurance contract; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time. Please refer to the **“How we charge for our services”** section of this FSG for further information.

Other payments we may receive

We will provide you with details of all fees, commissions, or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

Conferences

Our financial advice specialists may attend conferences and professional development seminars that have a genuine education or training purpose. Godfrey Pembroke may pay for the costs of travel and accommodation, and events and functions held in conjunction with the conference or seminar.

Non-monetary benefits

Godfrey Pembroke and your financial advice specialist maintain a public register outlining the alternative forms of remuneration that are payable to, and by us e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting your financial advice specialist. Please be aware that Godfrey Pembroke may charge you for the cost of providing this information to you.

Sponsorship

Godfrey Pembroke receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and we do not directly share in the sponsorship payment; however, we may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.

Referrals

At present we do not have any referral arrangement in place to pay a third party referrer a referral fee, commission or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Referrals to a third party

At present we do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Death & TPD Succession/Estate planning

In the event of our death or permanent disablement, Godfrey Pembroke may acquire our client servicing rights. This helps manage the transition of ownership to ensure you continue to receive advice.

How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST.

We have detailed a full range of fees below, but note that only fees applicable for the advice and services you choose will apply.

In complex cases the fees could be greater than those disclosed below. In these instances, we will inform you of the exact fee payable promptly in writing.

Note that we are now subject to requirements which mean we can only charge fees from your superannuation or pension account where the advice is in relation to that account. If you would like our fee deducted from your superannuation or pension account, we will discuss this with you to determine if it is appropriate for you.

Initial consultation	<p>Initial meeting \$660 for up to a 1 hour meeting.</p> <p>This will include collecting and processing information before and at the meeting, plus the time required after the meeting dealing with file notes for compliance and providing details of our understanding of your requirements and a written cost estimate for the next steps (Scope of Advice).</p>										
Due diligence process	<p>Where not all of the required information to prepare the Scope of Advice was available at the initial consultation, we would seek your instructions to undertake the required due diligence process. This is charged on a time used basis.</p> <p>Hourly rates as follows</p> <table data-bbox="497 981 858 1137"> <tr> <td>Principal Adviser</td> <td>\$ 440</td> </tr> <tr> <td>Associate Adviser</td> <td>\$ 320</td> </tr> <tr> <td>Paraplanner</td> <td>\$ 220</td> </tr> <tr> <td>Client Service</td> <td>\$ 165</td> </tr> <tr> <td>Administration</td> <td>\$ 90</td> </tr> </table>	Principal Adviser	\$ 440	Associate Adviser	\$ 320	Paraplanner	\$ 220	Client Service	\$ 165	Administration	\$ 90
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Advice preparation	<p>Statement of Advice preparation fees will depend on the extent and complexity of the advice.</p> <p>So that you are always clear about costs, in all cases we will simply agree a specific project fee or an hourly fee basis with you prior to commencing work.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fees that may be charged across those widely varying situations.</p> <p>Accordingly, the minimum fee charge is \$1,650 while the maximum fee is \$22,000. However, for particularly complex scenarios, the advice preparation fee may be greater than the maximum.</p> <p>The actual fee per client will be on a quote per plan basis. Complex advice requirements, such the use of trusts and ownership structures, SMSF, executive share plan or multiple investment entities, overseas assets and incomes, etc., may result in higher fees than the maximum.</p>										

Implementation	<p>If we assist you to Implement advice provided to you, or assist you by providing other services, there may be a fee applicable for this service.</p> <p>The fee will depend on a number of factors, including the complexity of the advice and the anticipated work involved. In some cases, we will incorporate this cost in the fee for our advice and if so, we will state this.</p> <p>So that you are always clear about costs, if an Implementation fee is applicable, we would normally quote a specific fee in writing in our advice to you. This allows you to have a clear understanding of the cost of implementing our advice before making a decision to do so. In all cases we would agree a fee with you prior to commencing work.</p> <p>Circumstances, complexity and the extent of our involvement can vary significantly. We are required to state a range of minimum and maximum fees that may be charged across those widely varying situations. Accordingly, the minimum fee charge is \$Nil while the maximum fee is \$22,000. However, for particularly complex scenarios, the implementation fee may be greater than the maximum.</p>										
Services	<p>Where you are seeking assistance that doesn't form part of our implementation of advice or does not require advice, we would regard this as the provision of services.</p> <p>This may involve responding to various requests from you, through to attendance at meetings, liaising and instructing other professionals or service providers on your behalf or resolving issues or matters on your behalf. Essentially these are matters where our assistance doesn't require us to issue a Statement of Advice or Record of Advice.</p> <p>So that you are always clear about costs, in all cases we will simply agree a specific project fee or an hourly fee basis with you prior to commencing work. If this is charged on a time used basis the hourly rates are shown below.</p> <p>Hourly rates as follows</p> <table data-bbox="499 1153 861 1310"> <tr> <td>Principal Adviser</td> <td>\$ 440</td> </tr> <tr> <td>Associate Adviser</td> <td>\$ 320</td> </tr> <tr> <td>Paraplanner</td> <td>\$ 220</td> </tr> <tr> <td>Client Service</td> <td>\$ 165</td> </tr> <tr> <td>Administration</td> <td>\$ 90</td> </tr> </table>	Principal Adviser	\$ 440	Associate Adviser	\$ 320	Paraplanner	\$ 220	Client Service	\$ 165	Administration	\$ 90
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Ad hoc advice	<p>Where you are a new client seeking limited advice, a second opinion or other matters not requiring comprehensive advice, or if you are an existing client and seeking advice which falls outside the scope of recent advice, we will provide advice on an ad hoc basis. This is charged on a time used basis.</p> <p>We offer hourly rates as follows</p> <table data-bbox="499 1534 861 1691"> <tr> <td>Principal Adviser</td> <td>\$ 440</td> </tr> <tr> <td>Associate Adviser</td> <td>\$ 320</td> </tr> <tr> <td>Paraplanner</td> <td>\$ 220</td> </tr> <tr> <td>Client Service</td> <td>\$ 165</td> </tr> <tr> <td>Administration</td> <td>\$ 90</td> </tr> </table>	Principal Adviser	\$ 440	Associate Adviser	\$ 320	Paraplanner	\$ 220	Client Service	\$ 165	Administration	\$ 90
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Execution only service	<p>Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you. This is charged on a time used basis.</p> <p>We offer hourly rates as follows</p> <table data-bbox="499 1848 861 2004"> <tr> <td>Principal Adviser</td> <td>\$ 440</td> </tr> <tr> <td>Associate Adviser</td> <td>\$ 320</td> </tr> <tr> <td>Paraplanner</td> <td>\$ 220</td> </tr> <tr> <td>Client Service</td> <td>\$ 165</td> </tr> <tr> <td>Administration</td> <td>\$ 90</td> </tr> </table>	Principal Adviser	\$ 440	Associate Adviser	\$ 320	Paraplanner	\$ 220	Client Service	\$ 165	Administration	\$ 90
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Insurance products

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

Example (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.

Privacy Notification

To give you appropriate advice, our financial advice specialists will need to ask you about your current financial situation, what you are looking to achieve and other personal information.

Without this information, your financial advice specialist may not be able to provide you with advice relevant to your circumstances.

How we manage your personal information

We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy.

If you would like more information, please refer to the IOOF Privacy Policy available at www.ioof.com.au/privacy. You can also request a copy by calling our client services team on 1800 221 151 or by writing to:

Privacy Officer

Godfrey Pembroke Group Pty Ltd
Locked Bag 4004
Queen Victoria Building NSW 1230

Collecting and using your personal information

We will collect and use your personal information (which may, if authorised and required, include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. We may also collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant, or other reliable identity verification service providers. We do this only if it's necessary to do so, for example where:

- we need information from an insurer about an insurance application you make through us; or
- at your request, we exchange information with your legal or financial advisers or other representatives.

If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

What happens if you don't provide your information to us?

If you choose not to provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Disclosing your personal information

We may share your personal information (which may, if authorised and required, include your sensitive information, such as health information) with third parties for the purposes for which we are authorised to use your information.

This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including Godfrey Pembroke and other members of the IOOF Group, depending on the financial services and products you have requested;

- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee Godfrey Pembroke and other members of the IOOF Group;
- your representatives, service providers, or other organisations, 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; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities) where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia. Any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient complies with Australian privacy laws.

Marketing activity

We presume you consent to being contacted by us (including Godfrey Pembroke and other members of the IOOF Group) may contact you from time to time on an ongoing basis about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the '**Contact us**' section of this FSG). We will process your request as soon as practicable.

Accessing or correcting your personal information

You can ask us to correct, or to provide you with access to, information we hold about you. You can find out how to seek access to or the correction of your information by reading our Privacy Policy or by contacting us. Our Privacy Policy is available at www.ioof.com.au/privacy or you may request a copy from our client services team on 1800 221 151.

Complaints

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (by contacting us) or by referring to the '**Your confidence in our advice**' section of this FSG.

Further information

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the '**Contact us**' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at oaic.gov.au