

# Gilkison

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# Privacy Statement

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## The Privacy Act

Gilkison Group Pty Ltd ("Gilkison Group") regards Privacy as a pertinent issue and understands that it is important for you to know how we handle your personal information.

Privacy Laws apply to how we collect, hold, use and disclose your personal information. Gilkison Group complies with its obligations under the Privacy Act 1988 and the associated Australian Privacy Principles ("APPs") and is committed to protecting the privacy of your personal information.

You can obtain further details of our obligations as an organisation under Australia's privacy laws from the Office of the Australian Information Commissioner (Commissioner) or by reference to the APPs and the Commissioner's associated guidelines at [www.oaic.gov.au](http://www.oaic.gov.au).

The following Privacy Policy has been published to provide you with an outline of the following:

- What information we collect about you;
- How we collect personal information;
- What we do with your personal information;
- Who we disclose personal information to;
- How we protect your personal information;
- How to keep your personal information accurate and up to date;
- How you can access your personal information; and
- Who to contact if you have any questions about this Policy or wish to make a complaint.

## What is Personal Information?

The APPs apply to Personal information. Personal information is recorded information about a person which is capable of identifying the person (e.g. name, address, etc). Gilkison Group does not use any standard identifiers for our clients (e.g. client identification number).

Sensitive information is a type of Personal information. It is defined as information or opinion about an individual's health, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices and criminal record.

The APPs offer greater safeguards for sensitive information.

## Purpose and Use of Personal Information

Gilkison Group collects and may use your information to do one or more of the following:

- Open, update and maintain your client file;
- Enable us to assess any request from you for advice;
- Provide analysis of your needs in our area of service;
- Develop, improve and market our services;
- Send research information to you;
- Notify you of any products which may suit your needs as we understand them;
- Keep you informed on matters that may affect or be related to your situation;

- Enable us to meet our obligations under certain laws; and
- To provide you with regular reviews.

Gilkison Group does not engage in any direct marketing activities.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Some laws require or authorise our collection of your personal information including the Anti-Money Laundering and Counter-Terrorism Financing Act 2006(Cth).

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

We will retain the information we collect from you for a period of at least 7 years, as required by law.

## How we collect Personal Information

Personal information is generally collected from you or has been collected in the past from you unless you have consented to us obtaining information from a third party. We may gather information via our website where clients make an enquiry and provide such information. If you have been referred to us by a third party, we will seek your consent and authority to pass personal information between the third party and ourselves for the purpose of providing you with a more complete service.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information that is not relevant, we will destroy or de-identify that personal information as soon as practicable.

## What Personal Information do we collect, or have we already collected?

The Personal information Gilkison Group collects from you, is necessary to allow us to provide service that is appropriate to your individual circumstances. The Personal information that Gilkison Group collects may include all or any of the following Personal information:

- Your name, address, contact details and date of birth;
- Your Tax File number;
- Details of your annual income, expenditure and employment;
- Details of your assets and liabilities;
- Details of any securities or investments you have given us;
- Details of your associated bank accounts;
- Details of existing insurances;
- Details of specific transactions;
- Details of your investment objectives and risk profile; and

- Details of health information relating to your insurance and investment requirements.

We will assume you consent to the collection of your Personal information in the manner specified in this Privacy Statement until you tell us to the contrary.

## **Using and Disclosing your Personal information**

We use your Personal information to provide you with service and advice in our areas of expertise.

You may choose not to provide us with your Personal information. If you do not provide us with relevant Personal information, we may not be able to provide you with the service or advice you have requested, or the service or advice we provide you with may not be relevant to the needs of your individual circumstances.

In order to provide you with services, we may need to disclose your personal information to third parties. The organisations that we are likely to disclose information about you to include:

- To any of Gilkison Group's related companies;
- Our agents, contractors and external service providers;
- To our professional advisers, auditors and insurers;
- Your representatives;
- The Australian Financial Complaints Authority or Office of the Australian Information Commissioner;
- Organisations involved in a transfer or sale of our assets or business;
- Anyone to whom the disclosure is required or permitted under the Privacy Act, other Australian Law, Regulation or Court/Tribunal Order; and
- Anyone else where you have provided your consent.

We may disclose your personal information to overseas entities that we deal with in the course of our business. These recipients may be located in the United States of America, India and the Philippines.

We will not disclose personal information to recipients outside of Australia unless:

- We have taken reasonable steps to ensure that the recipient does not breach the Act and the apps;  
or
- The recipient is subject to an information privacy scheme similar to the Privacy Act.

## **Use of Artificial Intelligence (AI) technology**

To deliver a better service to our clients, we utilise artificial intelligence (AI) technologies within our business. Where we have your consent, we will record and transcribe meetings and calls. Consent may be obtained verbally, electronically, or through our engagement documents. Recorded transcripts, summaries and AI-assisted file notes will contain personal information which will be reviewed by Gilkison Group staff before being relied on as client records. We handle personal information and sensitive information collected through these processes in accordance with the Australian Privacy Principles, this Privacy Policy, and our information security procedures.

You may decline or withdraw consent to recording or transcription at any time. If you do so, we will use alternative record-keeping methods, such as manual file notes. Withdrawal of consent will generally apply to future meetings and calls, but we may retain existing records where required or reasonably necessary for legal, regulatory, compliance or dispute resolution purposes. If you have questions or concerns about the use of recording, transcription or AI-assisted tools in your interactions with Gilkison Group, please contact us at [mail@gilkisongroup.com](mailto:mail@gilkisongroup.com)

## Website & Cookies

We collect personal information about you when you use and access our website. While we do not use browsing information to identify you personally, we may record certain information about your use of our website, such as which pages you visit, the time and date of your visit and the internet protocol address assigned to your computer. We may also use 'cookies' or other similar tracking technologies on our website that help us track your website usage and remember your preferences. Cookies are small files that store information on your computer, TV, mobile phone or other device. They enable the entity that put the cookie on your device to recognise you across different websites, services, devices and/or browsing sessions. You can disable cookies through your internet browser but our websites may not work as intended for you if you do so.

Our website may contain links to websites operated by other people. Those links are provided for convenience and may not remain current or be maintained. We are not responsible for the privacy practices of, or any content on, those linked websites, and have no control over or rights in any linked websites. The privacy policies that apply to those other websites may differ substantially from our Privacy Policy, so please read them before using those websites.

## Quality and Security of Personal Information

We recognise the importance of securing the personal information of our clients.

Gilkison Group will primarily hold information about you electronically on secure servers located in Australia. Where information is held electronically, Gilkison Group utilises technological safeguards including passwords and multifactor authentication. We may also hold some of all or your information in printed form in our office from time to time.

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

## Access to Personal Information

You can gain access to your personal information (subject to some exceptions allowed by law) by contacting the Privacy Officer. We will need to verify your identity first. We will provide you access within 30 days if it is reasonable and practicable to do so, but in some circumstances, it may take longer (for example, if we need to contact other entities to properly investigate your request).

We may refuse to provide you with access in certain circumstances. If access is refused, we will give you a notice explaining the reasons for our decision and your options to make a complaint.

We do not usually charge you for access to your personal information. However, if the request is complex, we may charge you the marginal cost of providing the access, such as staff costs of locating and collating information or copying costs. If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

## Complaints

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us on the details below. We are committed to resolving your complaint and doing the right thing by our clients. We will investigate your complaint and provide you with our response within 30 days. Please see our Complaints Policy available on our website for full details of how we deal with complaints.

If you have any questions, have a complaint, or think we have breached any aspect of this Privacy Statement, please contact us as soon as possible to discuss the matter. We may be contacted using the following information:

### Gilkison Group

PO Box 2158, Como WA 6152

P: 08 9364 1100 | F: 08 9364 1122 | E: [mail@gilkisongroup.com](mailto:mail@gilkisongroup.com) | W: [www.gilkisongroup.com](http://www.gilkisongroup.com)

Alternatively, you can contact the Office of the Australian information commissioner using the following information:

### Director of Complaints

Office of the Australian Information Commissioner, GPO Box 5288, Sydney NSW 2001

P: 1300 363 992 | Online Submission [www.oaic.gov.au](http://www.oaic.gov.au)

If you are not satisfied with the outcome of your complaint, you are entitled to lodge a complaint with:

### Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001

P: 1800 931 678 | E: [info@afca.org.au](mailto:info@afca.org.au) | W: [www.afca.org.au](http://www.afca.org.au)

## Review

This policy will be reviewed annually or where there has been a material change to the business or legislation that impacts this policy.

## DOCUMENT HISTORY

Version	Date	Reviewed by	Description
5	October 2025	3Lines Consulting	Policy Review – inclusion use of AI section and website

<b>6</b>	<b>November 2025</b>	<b>GG Responsible Managers</b>	Inclusion of India in region for which GG disclose information
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