
Privacy Policy

3 July 2025

SelfWealth Pty Ltd
ABN 52 154 324 428, AFSL 421789
Level 7, 130 Lonsdale St,
Melbourne VIC 3000

Selfwealth 
by Syfe

Introduction

SelfWealth Pty Ltd ABN 52154 324 428 (421789) (referred to as Selfwealth, we, us or our) recognises importance of ensuring the confidentiality and security of your personal information. We are bound by the Privacy Act 1988(Cth) (Privacy Act), including the Australian Privacy Principles (APPs).

This Privacy Policy (Privacy) explains how we collect, use, disclose and manage your personal information and should be read in conjunction with the [Selfwealth Terms and Conditions \(Terms and Conditions\)](#). Some terms that are used as defined terms in this Privacy Policy (such as Advised Clients) are defined in the Terms and Conditions.

Changes to this Policy

Selfwealth will periodically review and update this Policy in accordance with product and service updates and incorporating regulatory, legislative and technology changes. Any changes will be effective immediately on the posting of the revised Policy on our website and depending on the nature of the change, we may also announce it by email (if we have your email address). By continuing to use our product, service or website you accept that all personal information held by us will be governed by the most recent policy.

You can view the most current version of this Policy on our website at www.selfwealth.com.au or you can email privacy@selfwealth.com.au to request a copy.

Privacy Officer

If you have any queries or concerns regarding this Policy, you can email your concerns to "The Privacy Officer" at privacy@selfwealth.com.au

Personal Information

"Personal information" is any information or opinion about a person, from which that person may be identified. Personal information can range from standard to sensitive and confidential information, to information that is publicly available. The definition makes clear that information can be personal information even if it is incorrect.

'Sensitive information' includes information about racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record. This type of personal information is generally afforded a higher level of protection under the Privacy Act.

Selfwealth does not store any sensitive information as defined by the Privacy Act.

Personal Information we collect and why

The types of personal information we may collect about an individual will depend upon the nature of our interaction with them. Personal information that we collect may include (but is not limited to) the following information from the following categories of individuals:

- **our customers/clients and potential customers/clients (including our direct clients as well as Advised Clients):** details to verify your identity, assess your application for our products and services, provide our products and services, and monitor, identify and prevent fraud, including:
 - your full name
 - date of birth
 - contact details
 - current and previous addresses
 - document identification numbers (such as passports, driver's licence, Medicare numbers, or other national cards); other identity verification information including from third parties
 - occupation
 - financial information, including Tax File Number (TFN), source of wealth and your Holder Identification Number (HIN) details
 - your trading, brokerage and cash transactions data (**Portfolio Information**) when you use our trading, portfolio and performance management solution (**Solution**), or when your Adviser uses our Solution to manage your portfolio on your behalf
 - credit card number (aka Primary Account Number (PAN)) is only required if Self-Directed Investors are making credit card payments to Selfwealth for their Premium Subscription Membership. Payments are handled by Payment Processing Provider (eWay) with PANs stored and processed at eWAY. Selfwealth do not store PANs).
- our **Adviser users:** details to enable us to do business with you and provide our Solution to you, so that you can use the Solution to manage portfolios of your Advised Clients
- **our suppliers, potential suppliers, and their representatives:**
 - general information to assess your business (such as its key personnel)
 - business contact information (names, roles, contact details) to communicate with you, arrange and administer your provision of goods and services to us.
- **our employees past and present, including job applicants:**
 - occupation and employment details including employment status and any previous work experience
 - information in connection with your employment with us (which may include health information)
 - information from or in connection with your resume or job application if you apply for a position with us (including information from referees and to verify your qualifications, work and academic history).

We are also required to collect personal information about you in accordance with our legal obligation under The Anti-Money Laundering and Counter Terrorism Financing (AML/CTF) Act 2006 to verify your identity, and to allow us to provide you with and market our products and services.

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

If you decline to provide the personal information we request, we may not be able to accept your application, provide you with requested information, effectively conduct our relationship, or provide you with the benefit of our services.

Anonymity

In order to use our services, it is a requirement for Selfwealth to be able to identify and verify an individual's identity and therefore we do not give our clients and Advisers the option of dealing with us anonymously, or under a pseudonym.

How and when we collect Personal Information

We collect personal information from you in 3 ways;

- When you provide it to us directly through our application process, forms, and other interactions with you via email, live chat or phone.
- When you visit our website, use our mobile app, provide feedback and complete surveys
- When we collect personal information from other third-party sources.

Website Data Collection

When you visit and browse our website, solution or app (websites), we may collect personal information as necessary to make our services work, to improve our performance and functionality or to personalise your online experience.

The information collected may include, the number of users visiting our website, solution or app and the number of pages viewed, the date time and duration of a visit, and the IP address or location of the user

How we use Cookies and Similar Technologies

Cookies are text files that are stored on your device when you visit our websites. Cookies allow the website to recognise your device each time you visit enabling us to track your use of the website to:

- personalise and improve your experience
- Improve protection, security and prevent fraudulent activity (Anti-forgery Token, etc.).
- Delivering content helping us to analyse the performance of our services.

We automatically collect the following information through our cookies:

- Connection information such as the IP address

- Computer information such as device, application, browser type (and plug in type) and version, operating system, or time zone browser setting
- Credentials and security information for Authentication and Authorisation purposes
- URL requests made to, though, and from our site including date/time, possible page response times, errors, and other information.

Some cookies are deleted at the end of your browsing session, while others such as essential cookies, persist between sessions. These persistent cookies do not store sensitive information and you are within your rights to delete these cookies at any time.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences. If you disable the use of cookies on your web browser or remove or reject specific cookies from our website or linked sites then you may not be able to gain access to all of the content and facilities in those websites.

Web Analytics

We use Analytics tools (including but not limited to Google Analytics) to help analyse how you use our website. These tools generate statistical and other information about your use of our services.

If you do not want your website visit data reported by Google Analytics, you can install the Google Analytics opt-out browser add-on. For more details on installing and uninstalling the add-on, please visit the Google Analytics opt-out page at tools.google.com/dlpage/gaoptout.

For more information on other analytic tools used by Selfwealth please contact privacy@selfwealth.com.au.

Third Parties

Approved third parties who are integrated into our services may also set cookies when you use Selfwealth services. Third parties include, providers of analytics and measurement services, social media networks, potential for advertising and caching purposes. These third parties use cookies in the process of delivering content and to perform services on behalf of Selfwealth.

Unsolicited Personal Information

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required to collect. If we do this, we will retain the information in the same way we hold your other personal information.

How we use the Personal Information

We may use and disclose the information we collect about you for the following purposes:

- Comply with relevant laws, regulations, and other legal obligations e.g. AML/CTF obligations
- Provide you with information or services you have requested
- Conduct identification verification
- Assist you or to provide, manage and support your portfolio (or your Advised Clients' portfolios) through our solution and services;
- Provide our Data Feeds functionality to you or your Adviser to allow you to conveniently share your Portfolio Information with your chosen Third-Party Providers;
- Promote and market our services to you;
- Personalise and customize your experiences on our website, solution or app;
- Communicate with you;
- Provide you with ongoing information about us in which you may be interested;
- Conduct research and development for the purposes of improving our existing services or creating new services;
- Protect you and our services against fraud, theft or and other unauthorised uses;
- Other business activities such as research, recruitment and investigations; and
- Give you the opportunity to receive emails and other advertising material.

If we collect and use your personal information for purposes not listed above, we will take reasonable steps to make it known to you at the time we collect and/or use your personal information.

We may aggregate information including personal information for reporting, statistical and analysis purposes, and for business, product and service improvement purposes. We may also de-identify information for inclusion in such aggregated databases or reports, as well as for inclusion in our Peer Portfolios.

We reserve the right at all times to monitor, review, retain, and/or disclose any information as necessary to satisfy any applicable law.

You consent to us using your personal information in the above ways and as set out in this Privacy Policy.

We may otherwise collect, use or disclose your personal information where the collection, use or disclosure is:

- in accordance with this Privacy Policy or any agreement you enter into with us; or
- required or authorised by law, including without limitation the APPs under the Privacy Act 1988 (Cth).

Disclosing your Personal Information

Depending on the nature of your engagement with us, we may disclose your personal information to our related entities or third parties which may include but is not limited to:

- Other parts of our organisation;
- Your Adviser (if you are an Advised Client);
- Your nominated representatives;
- Service providers integral in maintaining and providing our services
- Organisations involved in managing payments, including payment merchants and other financial institutions such as banks;
- Third Party Providers as instructed by you or your Adviser in accordance with the Data Feeds functionality provided in our solution;
- Representatives, agents or contractors who we appoint in the ordinary operation of our business to assist us in providing goods or services or administering our business (such as for data storage or processing, printing, mailing, marketing, planning and product or service development);
- Any other agent, contractor or service provider we engage to carry out our functions and activities, such as our lawyers, accountant;
- Regulatory bodies, government agencies, law enforcement bodies and courts in accordance with our legal obligations; and
- Anyone else to whom you or your Adviser authorise us to disclose it or as required by law.

If we disclose your personal information to third party service providers that perform business activities for us, we take reasonable steps to ensure they may only use your personal information for the specific purposes for which we supply it. All third parties are also responsible for their own privacy policies and practices.

We may also disclose your personal information to cooperate with law enforcement authorities in the investigation of suspected criminal violations, or if there has been a breach of this privacy policy.

In the event a complaint including a suspected or alleged breach of privacy involves you, we may need to gather information from you to examine your transmissions and materials on services or any networks as required.

Data Feed Services

As set out in our Terms and Conditions, if you, or your Adviser on your behalf, register for our Data Feed Service we will disclose your Portfolio Information data including personal information with financial planning and other software providers (Third Party Providers) for the provision of services by those Third Party Providers to you or to your Adviser. We will only do so on your or your Adviser's instruction. You can instruct us to cease sharing your Portfolio Information data with the Third-Party Providers via the solution, as further set out in our Terms and Conditions.

Peer Portfolios

As part of our product and services, you consent to make your verified portfolio (including the available investments which it contains and its historical performance) visible to other Users on the platform under a pseudonym.

We confirm your personal information is not disclosed to other users with your verified portfolio.

Direct Marketing

We may only use your personal information we collect from you to provide you with promotional material if

- The personal information does not include sensitive information; and
- You would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- We provide you with the ability to “opt out” of direct marketing; and
- You have not requested to opt out of receiving direct marketing from us.

If you do not wish to receive such material, we provide you with the ability to unsubscribe from these communications by

- selecting the “unsubscribe” option on the communication;
- logging into your account and navigating to settings > communications > Marketing communications or
- sending a request directly to privacy@selfwealth.com.au.

Unless otherwise specified in this Privacy Policy, we will not disclose any of your personal information to any other organisation for marketing purposes unless the disclosure is required by law or is otherwise permitted by the APPs.

Corporate Communications

From time-to-time Selfwealth will send you communications relating to changes to product and services or our disclosure documents, which we refer to as corporate communications. These communications are not deemed direct marketing communications and therefore you are unable to “opt out” of these communications.

Cross Border Disclosure of Personal Information

Selfwealth generally maintains centralised servers and systems in Australia and may maintain servers and systems elsewhere. In certain circumstances some of your personal information may be disclosed, transferred, stored, processed or used overseas by us, or by third party service providers.

This may happen if:

- we outsource certain activities overseas;
- transactions, information, services or products have an overseas connection; or
- our computer systems including IT servers are located overseas.

Selfwealth may also subcontract the processing of your data to, or otherwise share your data with, other third parties in Australia or countries other than your country of residence. As a result, the personal information, sensitive information and other information that we collect through or in connection with the sites may be transferred to and processed in Australia, the United States, or another jurisdiction outside Australia for the purposes described above and in this Privacy Policy, pursuant to methods permitted by Australian laws for ensuring that information about you will be adequately protected. These countries may change from time to time.

The data protection laws in these countries may be different from, and less stringent than, those in Australia. We take reasonable steps to ensure that the overseas recipients of your data are subject to appropriate contractual obligations to safeguard and protect your personal information, sensitive information and other information and comply with applicable privacy obligations.

By accepting this Privacy Policy, using the sites or the solution, or by providing any personal information, sensitive information or other information to us, you expressly consent to such transfer and processing.

Identifiers

Government related identifiers are identifiers issued by a government body and include such items as a driver's licence number, medicare number, passport or tax file number.

We do not use or disclose a government related identifier unless:

- Required or authorised by law
- Required to verify an individual's identity and/or
- Another prescribed exception applies.

Securing your Personal Information

We at Selfwealth comply with high levels of information security across all domains and we are extremely focused on the strong protection of your data confidentiality, integrity, privacy, and availability. The services we provide are regularly penetration tested both externally and internally and we take reasonable steps to protect your information in line with industry standards.

Although we have a strong information security posture, we have adopted a continuous improvement methodology of our security practices to ensure we can protect you from new and emerging threats.

Additional detailed information regarding the safeguarding of personal information can be viewed at: www.selfwealth.com.au/security

Storage and Processing of Information

Selfwealth services are hosted by Amazon Web Services (AWS) who are certified with internationally recognised security standards including; ISO27001 and PCI-DSS. We store your data within the Australian AWS region and leverage AWS services and capabilities to ensure high levels of redundancy and protection for that data.

Some information must be disclosed, stored or processed by our third parties to provide services. All service providers that store data go through security due diligence to ensure appropriate levels of security and protection for information based on the sensitivity of the data (aka data classification).

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Accessing your Personal Information?

Subject to some exceptions set out in the Privacy Act, you are entitled to access personal information that we hold about you. If you request access to your personal information, we will be required to verify your identity before granting your request. Where your request for personal information would unreasonably impact upon the privacy of others or is not otherwise permitted under the APPs, Selfwealth have the right to refuse this request. If we refuse your request to access your personal information, we will provide you with reasons for the refusal.

Please address your request to access your personal information to our Privacy Officer at privacy@selfwealth.com.au

Updating your Personal Information

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 update any personal information we hold about you and provide the facility to update some of your personal details via your account. However, in some instances we will request the update of your personal details in writing and may request supporting documents to verify your identity. This is to ensure all requests for updates to personal information are received by the account owner and to assist in the protection of your personal information.

If we correct information that has previously been disclosed by us to another entity, we will notify the other entity within a reasonable period of correction. Where we are satisfied the information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise.

If we find we have no further need for your personal information, we may remove it from our systems.

To update your personal information please contact privacy@selfwealth.com.au

Complaints

You can make a complaint to us if you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this Privacy Policy in respect of your personal information, or for any other queries, or communication in relation to this Privacy Policy, please attention your concerns to our Privacy Officer via email privacy@selfwealth.com.au. If you make a complaint, Selfwealth will confirm receipt of your complaint within 24 hours and will aim to resolve your complaint within 5 working days. However, where this is not possible, we will contact you within this time frame to provide you with an update and an expected time frame for the issue to be resolved.

If you are not satisfied with our final response, or if you have not received a response after 30 days, you may lodge a complaint with The Australian Financial Complaints Authority (AFCA) quoting:

Selfwealth Member Number:	30405
Website	www.afca.org.au
Email	info@afca.org.au
Phone	1800 931 678 (freecall) 1
Mail	Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001

Time limits may apply to complaints to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expire.

SelfWealth Pty Ltd

ABN 52 154 324 428, AFSL 421789

Level 7, 130 Lonsdale St,
Melbourne VIC 3000

