Oreana Financial Services Privacy Policy

Who We Are

Oreana Financial Services Pty Ltd ("Oreana"), an Australian Financial Services Licensee that provides financial advice services to clients across Australia, takes its obligations under the Commonwealth Privacy Act 1988 (Cth) (Privacy Act) seriously to protect your personal information.

About This Policy

This policy explains how Oreana collects, holds, uses and discloses your personal information in accordance with applicable privacy laws. We are bound by the Privacy Act and manage your personal information in line with the Australian Privacy Principles (APPs).
This policy applies to your dealings with us as a client. We recommend you read it carefully to understand how we handle your information and the steps we take to protect your privacy.

Personal and Sensitive Information

The Privacy Act protects your personal information, which is information or an opinion about an identified individual (or a reasonably identifiable individual). This may include details such as your name, contact details, date of birth, financial information, employment information and other information we collect in providing our services.

The Privacy Act also provides additional protections for sensitive information, including your racial or ethnic origin, religious beliefs, health information, genetic information, biometric information (for example, fingerprints or facial recognition data), and other sensitive details.

We only collect and use sensitive information where it is reasonably necessary for us to provide our services or meet our legal and regulatory obligations. If we need to collect sensitive information, we will generally do so with your consent, unless we are otherwise permitted or required by law to collect or use it without consent.

We may collect government-related identifiers (such as your tax file number, passport or driver licence number) where required or authorised by law, for example to verify your identity. We do not adopt a government-related identifier as our own identifier for you, and we only use or disclose it as permitted by the Privacy Act.

Where we collect your tax file number (TFN), we do so only for purposes authorised by law and handle it in accordance with the Privacy (Tax File Number) Rule 2015.

Purpose of Collection

We and/or our officers, employees, contractors and agents collect, hold, use and disclose information to assist us in our relationship with you. This information is collected from you, from the transactions performed on your behalf and/or from other people and organisations.

If you do not provide the information we need, we may be unable to provide the product or service you requested. We may also be required by law to collect information from or about you for specific purposes (for example, to identify you).

The types of information collected include, but are not limited to:

- information which identifies you (your name, date of birth, contact details, residence and citizenship status);
- information which relates to your financial affairs, business, employment, income or assets;
- information which arises or is required in connection with the transactions you do with us or through us;
- information which helps us to process applications made by you for particular products and services; and
- information relevant to product development or marketing.

Anonymity and Pseudonymity

All advice-related interactions do require your personal information to be provided to ensure your advice is personalised and relevant to your circumstances. If you decline to provide us with your personal information, we may not be able to provide you with any advice or services.

In scenarios of a general nature, you may choose to deal with Oreana either anonymously or use a pseudonym. Examples include:

- requests for brochures or general information;
- anonymous feedback or complaints (that do not require personal information to enable investigation).

How We Collect Your Personal Information

We collect your personal information directly from you or from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect such information from a third party. If you access our websites, we may also collect personal information when you interact with our website or online services. This may include technical information such as your IP address, device identifiers, browser type, operating system, pages viewed, and the date and time of access. We may use cookies and similar technologies, including analytics tools, to help operate our website, improve functionality and user experience, and monitor website performance.

How We Use Your Personal Information

We collect, hold, use and disclose personal information so we can provide you with financial products, advice and services relevant to your needs. We may also collect, use and disclose your information for related purposes such as:

- complying with our legal obligations, such as verifying your identity under anti-money laundering and counter-terrorism financing laws (AML/CTF)
- assisting with your questions and complaints
- arranging for services to be provided by third parties
- internal operations, such as record keeping, data analytics, auditing or training
- promotion of other products and services that may be of interest to you (you may opt out of marketing communications at any time).

We may disclose your personal information to third parties where this is necessary for the purposes described in this policy, including product issuers and platform providers, our service providers (such as paraplanning, transcription, IT and cloud storage providers), your other professional advisers where you have authorised this, our auditors and insurers, and regulators and other bodies (such as ASIC, AUSTRAC, the ATO and AFCA), or where otherwise required or authorised by law.
We collect, use, hold and sometimes disclose personal information about financial advisers and other people with whom we do business (including employees) to administer and manage our business operations. This information is provided by the same standard of care as that of our clients.

Automated Decision-Making

We use computer programs, including risk-profiling tools and financial advice and product modelling software, when preparing your advice. These programs use your personal information to help us make decisions about your risk profile and the strategies, projections and product recommendations in your advice.
The personal information these programs use includes your age, financial situation, employment, goals, investment preferences, risk-profiling questionnaire responses and, where relevant to insurance advice, health information.
Your adviser reviews the outputs of these programs and remains responsible for your advice. We will update this policy if we start using new programs, or change how we use them, to make decisions about you. If you have any questions, please contact our Risk & Compliance team.

How We Store and Secure Your Personal Information

We store your personal information in your client files or electronically. These files are accessible only to authorised personnel, are appropriately secured, and are subject to confidentiality requirements. We take reasonable steps, including technical and organisational measures such as access controls, multi-factor authentication, encryption, staff training and due diligence on our service providers, to protect your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure.

Personal information is treated as confidential information, while sensitive information is treated as highly confidential. We retain personal information as required by law and for business purposes, typically for at least 7 years. When we no longer need your personal information for any purpose permitted under the Privacy Act, and we are not required by law to retain it, we will take reasonable steps to destroy it or de-identify it.

Meeting Recording and Use of AI-Generated File Notes

In line with our commitment to quality, compliance, and transparent record-keeping, please be aware that all meetings, including in-person, telephone, and video conferences, may be recorded for quality assurance, training, and regulatory purposes.

We may also use secure AI technologies to assist in generating meeting summaries or file notes. These tools support the efficient and accurate documentation of discussions and are used in accordance with our privacy and data protection obligations. We will ask for your consent at the start of a meeting before recording it or using an AI tool and note your consent on your file. If you do not consent, we will not record the meeting or use AI tools. Recordings and AI-generated notes are stored securely and handled in accordance with this policy. Some AI and transcription providers may process information overseas (see ‘Sending information overseas’).

A copy of the file notes or meeting summary is available upon request. To request a copy, please get in touch with us in writing at contact@oreanapartnerships.com.au.

Sending information overseas

We may disclose your personal information to overseas recipients, including our service providers, in accordance with the Privacy Act. These countries include Singapore, Hong Kong and the United States, as well as other countries in the Asia Pacific region and Europe.

Some of our service providers store, process or back up personal information on overseas servers.

For example, our CRM, cloud storage, paraplanning and transcription services may involve overseas disclosure of personal information.

We do not sell your personal information. Some overseas recipients may not be subject to privacy protections equivalent to the Australian Privacy Principles. In those cases, we take reasonable steps, including due diligence and contracts with those providers, to ensure that the recipient does not breach the Australian Privacy Principles, and we remain accountable under the Privacy Act for how those recipients handle your personal information.

Accessing and Updating Personal Information

Any requests regarding the privacy of your personal information should be made to us in writing and addressed to Risk & Compliance.

There may be circumstances where we refuse to provide you with the information you request, for example, when the information is commercially sensitive. In these situations, we will inform you and explain why.

We will deal with requests for access to your personal information as soon as possible and respond within 30 days. If we need more time, we will let you know why and when we expect to respond.

If you believe the personal information we hold about you is inaccurate, out of date, incomplete, irrelevant or misleading, you may ask us to correct it. If we refuse to correct it, we will tell you why in writing and, if you ask, take reasonable steps to attach a statement to the information noting that you believe it is incorrect. We do not charge for making a request or for correcting your information.

We need your contact details, including your current home address, email address, and phone number. You can update your personal information over the phone by contacting your adviser, or electronically.

Your Rights

The Privacy Act and the Australian Privacy Principles outline our obligations and your rights. For example, you have the right to:

- know why your personal information is being collected, how it will be used and to whom it will be disclosed
- have the option of not identifying yourself, or of using a pseudonym in certain circumstances
- ask for access to your personal information (including your health information)
- stop receiving unwanted direct marketing and ask us for the source of the information we used for direct marketing
- ask for your personal information that is incorrect to be corrected
- make a complaint about us if you think we've mishandled your personal information

Important

This document provides an overview of our privacy policies and procedures (in addition to those that may apply to specific services and transactions), the disclosures we are required to make by law, and other matters. It is not intended to constitute legal advice in relation to your rights under any privacy legislation or any other matter.

Notifiable Data Breaches

We take the security of your personal information seriously. In the event of a suspected or actual data breach, we will promptly assess the incident to determine whether it is an "eligible data breach" under the law.

If we determine that a data breach is likely to result in serious harm to any individual, we will take appropriate steps to contain and remediate the breach. We will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as required under the Notifiable Data Breaches (NDB) scheme.

Where appropriate, we will also provide information about the breach, the type of information involved, and recommended steps you can take to protect yourself.

Changes to This Policy

This policy is available free of charge on our website. If you would like a copy in another form, please contact us. We review this policy regularly and may update it to reflect changes in the law or in our practices. This policy was last updated on 30 October 2026.

Contact Us about Privacy

Further information on our privacy policies and procedures is available from our office.
Please address to Risk & Compliance:

Oreana Financial Services Pty Ltd
Customs House
Level 3, The Hub
31 Alfred St,

Sydney NSW 2000 Australia
Phone: (61) 2 7238 4192

Or

contact@oreanapartnerships.com.au

Complaints about Privacy

If you are concerned about how your personal information has been collected, used, or disclosed, and you wish to make a complaint, please contact us using the details outlined above.

We will acknowledge receipt of a complaint within 1 business day. We will then investigate the complaint and respond to you within a maximum of 30 days following receipt of your initial complaint.

The Australian Financial Complaints Authority (AFCA) can consider certain privacy complaints should you feel the response from Oreana is not satisfactory and wish to escalate. The contact details for AFCA are:

Australian Financial Complaints Authority

- Online: afca.org.au
- Email: info@afca.org.au
- Phone: 1800 931 678 (freecall)
- Mail: Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
- If you are not satisfied with our response to your privacy complaint, you may also contact the Office of the Australian Information Commissioner (OAIC) for further information or to lodge a complaint. The OAIC can be contacted via its website at oaic.gov.au or by phone on 1300 363 992.