LEGAL

Privacy policy

What we collect, why we collect it, who else sees it, where it is held, how long we keep it, and how to make us stop. Written in plain language, because a privacy notice nobody can read protects nobody.

VERSION	LAST UPDATED	SECTIONS
1.0	10 September 2026	11

SECTION 01 OF 11

What this policy covers.

Everything Towemer Wealth does with information about you, whether you are a client, someone thinking about becoming one, or a visitor to this website.

We are governed by the Privacy Act 1988 and the Australian Privacy Principles. **Personal information** means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether or not it is true and whether or not it is written down. Your name is personal information. So is the fact that you asked us about retirement.

Some of what we hold is **sensitive information**, which the law protects more strictly and which we may generally only collect with your consent. Health information is the example most likely to arise here, because an insurance application asks for it.

This policy applies to information we hold in any form: in our systems, in email, on paper, and in the notes an adviser takes during a conversation.

SECTION 02 OF 11

Who is responsible for it.

Towemer Pty Ltd, the licensee. If you want something changed, deleted or explained, this is who to write to.

ENTITY	ABN
Towemer Pty Ltd, trading as Towemer Wealth	91 001 604 799
AFSL	ADDRESS
487918	Level 9, 350 Kent Street, Sydney, NSW 2000
EMAIL	PRIVACY ENQUIRIES
info@towemer.com	info@towemer.com

Privacy enquiries are handled by the firm's privacy officer. Write to info@towemer.com marked for their attention, or telephone +61 2 8105 5227, and it reaches them.

SECTION 03 OF 11

What we collect.

Advice you can rely on is built from facts about you. Here is the list, by category, and what each one is for.

- **Who you are.** Name, date of birth, address, email, telephone number.
- **Proof that you are that person.** The identity documents you upload when you open an account, which are reviewed by a person here. Anti money laundering law requires this and we cannot open an account without it.
- **Your financial position.** Income, assets, debts, tax file number where you choose to provide it, superannuation details, existing holdings, bank account details for settlement.
- **What you are trying to do.** Objectives, timeframes, how much variation in value you can live with, dependants, and anything else that changes what advice is right for you.
- **Health information**, only where you ask us to advise on insurance and only with your consent, because an insurer will ask for it.

- **Your dealings with us.** Advice documents, instructions, correspondence, file notes, transactions, and records of the checks we have done.

If you would rather not give us something, say so. We will tell you plainly what it means for the advice, and in some cases it means we cannot give it.

SECTION 04 OF 11

How we collect it.

Mostly from you, in conversation and on forms. Where it comes from anywhere else, you are told.

We collect information directly from you when you speak to us, complete a form, open an account, or send us an email. That is where most of it comes from and it is where we prefer it to come from.

Some information reaches us from elsewhere with your authority: from an existing adviser or accountant you have asked us to speak to, from a superannuation fund or a platform on which you already hold investments, and from a bank, fund manager, product issuer or insurer in connection with an application you have made.

If we receive personal information about you that we did not ask for and do not need, we destroy or de identify it, unless the law requires us to keep it.

SECTION 05 OF 11

Why we collect it.

To give you advice, to act on your instructions, and to meet obligations we do not get to opt out of.

- **To advise you.** The law requires advice to be appropriate to your circumstances, which means we have to know them.
- **To act on your instructions**, including placing transactions and arranging applications with banks, fund managers, issuers and platforms.

- **To verify your identity** and to meet obligations under anti money laundering and counter terrorism financing law.
- **To keep the records the law requires**, including records of advice, of instructions, and of the reasons for both.
- **To answer you** when you write to us or use the contact form on this website.
- **To manage complaints**, and to co operate with a dispute resolution scheme or a regulator where that becomes necessary.

We do not sell personal information. We do not disclose it for another organisation's marketing.

We write to you about your own account, your advice and the research behind it. We do not sell your details, we do not pass them to anybody else for their marketing, and we do not add you to a list because you once sent us a question. If we ever want to send you something that is not about your account, we will ask first, and one line back to info@towemer.com stops it for good.

SECTION 06 OF 11

Who else sees it.

The people who have to, for the thing you asked for to happen. Nobody else.

Depending on what you have asked us to do, we may disclose personal information to: a bank, to open a cash account or a term deposit in your name; a fund manager or its registry, to issue units to you; other product issuers, investment platforms and brokers, in order to open an account or place a transaction; an insurer, where you have applied for cover; your accountant, solicitor or another adviser, where you have asked us to; our own professional advisers and auditors; and a regulator, a dispute resolution scheme, or a court, where the law requires it.

We also rely on a small number of service providers to run the platform. Each acts on our instructions, is bound to keep your information confidential and to use it

only for the purpose we engaged them for, and may not use it for their own ends. A policy that says "service providers" without naming them tells you nothing, so here they are.

- **Supabase.** The database behind the client portal and the private storage that holds the documents you upload. The project runs in Sydney, so client records and identity documents are held in Australia.
- **Cloudflare.** Serves this website and the client portal. The pages themselves are public files. Traffic between your browser and the portal is encrypted, and your records are not stored on this layer.
- **Resend.** Sends the emails the platform generates, such as a sign in code or a notice that your account has been approved. Resend is a United States company, so the contents of those emails pass through the United States. We keep what they carry to a minimum for that reason.

Away from the platform we use ordinary business tools to run a firm: email and a calendar, an accounting package, and secure file storage. Each is bound by its own agreement with us, none is given more than the work requires, and where one of them holds anything about you it is covered by everything else in this policy.

SECTION 07 OF 11

Where it is held.

Whether your information stays in Australia is a fair question and it deserves a specific answer rather than a general one.

Your records stay in Australia. The client portal, the database behind it and the private storage holding the documents you upload all run in Sydney. Nothing about your account, your holdings or your identity documents is stored outside Australia.

One thing does leave, and you should know what. The emails the platform sends you, such as a sign in code or a notice that your account has been approved, are

sent through a provider based in the United States. What those emails carry is deliberately kept thin for that reason. Nothing is sent by email that would matter if it were read by somebody else.

Under the Privacy Act 1988 and the Australian Privacy Principles, if we disclose personal information to anyone overseas we must take reasonable steps to ensure they handle it consistently with those principles, and in most cases we remain accountable for what they do with it.

Where a service provider we use operates outside Australia, we take the steps that Act requires of us: we satisfy ourselves that they handle personal information consistently with the Australian Privacy Principles, we bind them contractually to do so, and we remain accountable to you for what they do with it. If you want to know where a particular piece of information about you sits, ask, and we will tell you.

— SECTION 08 OF 11

How long we keep it.

Longer than you might expect, because the law says so, and then no longer than that.

Financial services law requires a licensee to keep records of the advice it gives and the reasons for it for **seven years** from the date the advice was given. Anti money laundering law requires identity records to be kept for seven years after the end of the relationship. Those periods are not ours to shorten, including at your request.

When a retention period ends, and the information is no longer needed for any purpose for which it may be used or disclosed, we destroy it or de identify it.

We hold nothing longer than we need to. Beyond the periods above, a record is kept only while there is a live reason for it, such as an unresolved complaint or a matter a regulator is looking at. Paper is shredded. Digital records are deleted from the systems that hold them and from the backups those systems keep, on

the ordinary backup cycle, so a deletion works its way through rather than happening everywhere at once.

SECTION 09 OF 11

How we keep it safe.

Access limited to the people who need it, encryption in transit and at rest, and a plan for the day something goes wrong.

Client records are held in access controlled systems. Access is limited to the people who need it to do their work, sign in requires more than a password, and traffic between your browser and the client portal is encrypted.

Australia's notifiable data breaches scheme applies to us. If a data breach occurs that is likely to result in serious harm to you, and we cannot prevent that harm, we are required to notify you and the Office of the Australian Information Commissioner as quickly as we can.

No system is perfect and anyone who tells you otherwise is selling something. If you believe your account has been compromised, tell us immediately.

SECTION 10 OF 11

What this website does, and does not do.

This site sets no cookies, runs no analytics, and loads nothing from anybody else. That is unusual enough to be worth stating plainly.

A **cookie** is a small file a website asks your browser to store, so that it can recognise the browser later. Cookies are how most sites count visitors and how advertising follows people around. This site does not set any, which is why you have not been asked to accept them.

There is no analytics service on these pages, no advertising or tracking pixel, and no social media button that reports back. Every font, image and script is served from this domain, so opening a page here does not tell any third party that you did.

Two things do happen. Our host keeps standard server logs, which record the request and the internet address it came from, and are used to keep the site working and secure. And if you use the contact form, what you type is sent to us so that we can reply to you, and it is handled under the rest of this policy.

The client portal at platform.towemer.com is a different matter. Signing in necessarily sets a cookie, because that is how a browser stays signed in. That cookie is there to keep your session secure and it is not used to track you.

SECTION 11 OF 11

Your rights, and how to complain.

You can ask what we hold, ask us to fix it, and take it further if we handle either badly.

Access and correction

You may ask for a copy of the personal information we hold about you. We will respond within a reasonable period and there is normally no charge for the request, though we may charge for the cost of giving access where the request is substantial. If we refuse, we tell you why in writing and how to complain about it.

If something we hold is wrong, out of date, incomplete or misleading, tell us and we will correct it. If we disagree that it is wrong, you may ask us to attach a statement to the record saying so, and we will.

Complaints

If you think we have mishandled your personal information, write to us at info@towemer.com. We will investigate and respond in writing within 30 days.

If you are not satisfied with our response, you may take the matter to the Office of the Australian Information Commissioner, which is the independent regulator for privacy in Australia and which can investigate at no cost to you.

BODY	TELEPHONE
Office of the Australian Information Commissioner	1300 363 992
ONLINE	POST
oaic.gov.au	GPO Box 5218, Sydney NSW 2001

A complaint about our advice or our fees, rather than about your personal information, goes through a different route. That is set out in the complaints section of our Financial Services Guide.

This is a printed copy. The current version is published at https://towemer.com/privacy/ and supersedes any copy in circulation.