Privacy Policy

DB5 Advisers Pty Ltd

This policy explains what personal information DB5 Advisers Pty Ltd collects about you, why we need it, who we disclose it to, how we protect it, and the rights you have in relation to it.

It applies to the Licensee and to every adviser and staff member who provides services on our behalf.

ENTITY	ABN	AFSL	PRIVACY OFFICER
DB5 Advisers Pty Ltd	52 661 311 539	543198	Anthony Blythe

VERSION	EFFECTIVE
3.0	13 November 2026

What we collect and why

Section 1

1.1 Why do we need your personal information?

Advice that is right for you depends on us understanding your circumstances, your objectives and what you need. We cannot provide it without that information.

The law also requires us to collect certain information before we provide financial services, and to verify your identity before we act for you.

Personal information is information or an opinion about you, where your identity is apparent or can reasonably be worked out from it. It does not matter whether the information is true, or whether it is written down.

1.2 What do we collect?

The information we ask for depends on the advice you want. It usually falls into these categories.

CATEGORY	WHAT THAT INCLUDES
Identity	Your name, date of birth, place of birth and the documents we use to verify who you are
Contact	Your residential and postal addresses, email addresses and telephone numbers
Government identifiers	Your tax file number, and any Medicare or driver licence number we sight or keep as proof of identity
Financial	Your income, your spending, what you own and what you owe, your capacity to save, and your superannuation, insurance and existing investments
Employment	Your occupation, your employer, and your employment history
Family	Your partner, anyone who depends on you, your estate planning arrangements and who you have nominated as beneficiaries
Your objectives	What you want to achieve and by when, your attitude to investment risk, and how much of it you are comfortable with
Entitlements	Your eligibility for Centrelink or Veterans' Affairs benefits
Anti-money laundering checks	Where your money comes from, your connections to other countries, the results of sanctions and politically exposed person screening, and the money laundering and terrorism financing risk rating we calculate. See section 3.4
Health	Where we advise on insurance. See section 1.3

1.3 What about sensitive information?

Most of the information we collect does not require your consent, only that it is reasonably necessary for the advice you have asked for. Sensitive information is different.

Some information needs your consent before we can collect it. This includes health information, which we usually need when we advise on life, income protection, trauma or total and permanent disability insurance.

We only collect sensitive information where it is reasonably necessary for the advice you have asked for, and we will tell you why we need it.

1.4 What about your tax file number?

Your tax file number is a government related identifier. We collect it only where the law requires or allows it, or where it is needed to set up or administer a product for you.

We do not use it to identify you in our own records, and we do not use or disclose it except where the law permits. We treat other government identifiers the same way, including a driver licence or Medicare number we sight or keep as proof of identity.

1.5 What if the information is about someone else?

Some of the information we hold is about people other than you. Your partner, your children, the people you nominate as beneficiaries, and sometimes your accountant or solicitor.

Where you give us information about someone else, please tell them we hold it and point them to this policy. Anyone whose information we hold has the same rights of access and correction set out in section 4.

1.6 Do you have to provide us with information?

No. You can decline to give us information, or decline to let us collect it from someone else.

But there are consequences. Without the information we ask for, we may not be able to provide the advice you want, and in some cases we may not be able to act for you at all.

Incomplete or inaccurate information carries a real risk. Advice built on the wrong facts may not suit you, and acting on it could leave you worse off. If something changes, or if you think we have something wrong, tell us.

1.7 Can you deal with us anonymously?

The law gives you the option of dealing with us anonymously, or under a name that is not your own, where that is lawful and practical.

In practice this is rarely possible. Anti-money laundering law requires us to identify and verify you before we provide most financial services, and advice that suits you depends on us knowing who you are. We can give you general information without identifying you, but not personal advice.

If you have concerns about how you are identified in our records or our correspondence, raise them with our Privacy Officer and we will accommodate you where we can.

How we collect your information

Section 2

2.1 How do we collect your information?

Directly from you, in most cases. In meetings, by telephone, by email, and through the forms we ask you to complete. This is the most reliable source, because you can correct us as we go.

From others, where you have authorised it or the law requires it.

SOURCE	EXAMPLES
Financial institutions	Banks, superannuation funds, investment platforms, insurers and product issuers
Overseas pension schemes	Scheme administrators, trustees and their advisers, where you have engaged us in relation to an international pension transfer
Professional advisers	Your accountant, solicitor or another financial adviser, where you have asked us to deal with them
Government agencies	The Australian Taxation Office, Centrelink, and regulators
Family members	Your partner, an adult child or another relative, where they hold the appropriate authority
Employers	For employment verification and superannuation details

Where we collect information about you from someone else, we take reasonable steps to tell you, unless you would already know.

2.2 What do we collect from our website?

When you visit our website, complete an online form, or open an email from us, some information is collected automatically. This includes your IP address, your browser and device type, the pages you look at, and the date and time of your visit. We use cookies and similar technology for this.

We use it to run the website, understand how it is used, and keep it secure. Most of it does not identify you. Where it is combined with other information we hold about you, we treat it as personal information and handle it under this policy.

You can set your browser to refuse cookies or to tell you when one is being set, though parts of the website may not work properly if you do.

Our website may link to other sites we do not control. This policy does not apply to them, and we are not responsible for how they handle your information.

2.3 What if we receive information we did not ask for?

If we receive information about you that we did not ask for, we decide whether we could have collected it under this policy. If we could have, we treat it the same way as information you gave us. If we could not, we destroy it or remove anything identifying you, as soon as practicable.

2.4 When do we tell you we are collecting your information?

At or before the time we collect it, or as soon as we can afterwards. We tell you who we are and how to contact us, why we are collecting the information, who we usually disclose it to, whether any law requires us to collect it, what happens if you do not give it to us, and whether it is likely to go overseas.

You will usually find this in our Financial Services Guide or website disclosure information, and in the forms we ask you to complete.

How we use and disclose your information

Section 3

3.1 What do we use your information for?

We use your information for the purpose you gave it to us: to understand your situation, prepare and give you advice, implement what you decide to do, and review it over time.

We also use it to administer your account, to meet our obligations under the law, to respond to your questions and to any complaint you make, and to review and improve the services we provide.

3.2 Who do we disclose your information to?

We disclose your information where it is necessary to provide the services you have asked for, or where the law requires it. That may include:

- our advisers, staff and the practices that operate under our licence
- overseas pension schemes, their administrators, trustees and advisers, where you have engaged us in relation to an international pension transfer
- the issuers of products you hold or are considering, and the platforms that administer them
- others involved in administering your products or a claim, such as custodians, registries, actuaries and claims assessors
- your accountant, solicitor or other adviser, where you have authorised it
- our service providers, including our software, IT, paraplanning and mail providers
- our professional indemnity insurer, and our lawyers, where a claim or a complaint requires it
- our external compliance adviser, who reviews advice files to check the quality of the advice we give
- professional bodies we belong to, where they inspect files to confirm we are meeting professional standards
- ASIC, AUSTRAC, the ATO, AFCA and other regulators, where the law requires or authorises it

— a person considering acquiring an interest in our business, under confidentiality

We do not sell your information, and we do not give it to anyone for their own marketing.

3.3 Does our marketing use your information?

We may contact you about services we think will interest you. You can opt out at any time, by telling us or by using the unsubscribe link in any email, and we will stop.

We do not use sensitive information for marketing without your consent.

3.4 Do we use automated decision-making?

We use an electronic assessment form to help us meet our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006. The form uses your identity details, date of birth, address, occupation, source of funds, country connections, and the results of sanctions and politically exposed person screening to automatically calculate a money laundering and terrorism financing risk rating.

The rating helps us decide whether further checks are needed and whether we can provide our services to you. The person completing your assessment reviews the rating and can change it.

We do not use any other computer program to make decisions about you that could significantly affect you.

3.5 Does your information go overseas?

Some of the systems and services we use are provided from outside Australia, or store information on servers located outside Australia. This may include software we use to prepare and store your advice, our email and document storage, and support or administrative staff who work for us from another country.

We specialise in international pension transfers, so we may need to send your information overseas to service providers or other third parties who operate or hold data outside Australia.

Where that happens, we take reasonable steps to ensure the overseas recipient handles your information consistently with Australian privacy law, including through the terms on which we engage them and the controls described in section 4.

We remain responsible for your information. Sending it overseas does not transfer our obligation to protect it.

The countries to which we may send your information are the United Kingdom, Malta, Gibraltar, New Zealand and the United States of America

Your rights

Section 4

4.1 Can you see what we hold about you?

Yes. Contact our Privacy Officer using the details in section 6, and tell us what you want.

We will respond within 30 days. We may ask you to verify your identity first. Where a request is complex we will tell you if we need longer, and why.

There is no charge for making a request. We may charge a reasonable amount for the cost of retrieving and providing the information, for example where a request covers many years or a large volume of records. We will tell you what that will cost before we incur it, and you can narrow or withdraw your request at that point.

When might you say no?

Rarely, and only where the law allows. For example where giving access would unreasonably affect someone else's privacy, or where the information relates to legal proceedings. If we refuse, we will tell you in writing why, and how to complain about that decision. Where we cannot give it to you in the form you asked for, we will discuss an alternative.

4.2 Can you correct your information?

Yes, and we want you to. We take reasonable steps to keep your information accurate, complete and up to date, and we correct it when you ask or when we become aware it is wrong.

We respond within 30 days.

If we have already given the incorrect information to someone else, you can ask us to tell them about the correction, and we will unless it is impractical or unlawful.

If we decline to correct something, we will tell you why. You can then ask us to attach a note to the record saying you consider it inaccurate, and we will.

4.3 How long do we keep your information?

Seven years after our advice relationship with you ends, or longer where another law requires it. After that we destroy it or remove anything that identifies you.

We keep it that long because the law requires us to be able to produce our advice records, and because a question about advice can arise years after it was given.

4.4 How do we protect your information?

We maintain a documented set of security controls covering who can access your information, how it is stored and transmitted, how our systems are kept current, and how information is destroyed when it is no longer needed. Those controls are reviewed regularly and updated as the risks change.

Everyone who works for us is trained on handling your information, and access is limited to those who need it for their role.

We do not publish the detail of our security arrangements, because doing so would itself create a risk.

Data breaches and complaints

Section 5

5.1 What happens if your information is compromised?

If your personal information is lost, or accessed or disclosed without authority, we act immediately to contain it and work out what has happened.

Where we believe the incident is likely to cause you serious harm, the law requires us to tell you and to notify the Office of the Australian Information Commissioner as soon as we can.

We will tell you what happened, what information was involved, and what we recommend you do about it. Where we have already taken steps that reduce the risk to you, we will tell you that too.

Where we are still working out whether an incident is likely to cause serious harm, the law gives us up to 30 days to assess it. We do not wait that long where the position is clear.

5.2 How do you make a privacy complaint?

Raise it with us first, using the contact details in section 6. You can complain in writing, by telephone or in person. Putting it in writing helps us, but it is not required.

It helps us if you describe what happened, why you are unhappy, and what you would like us to do about it.

We will acknowledge your complaint promptly and respond within 30 days, setting out what we found, why, and what we propose to do. If we need longer we will tell you before the 30 days is up, explain why, and give you a new date.

Complaining costs you nothing and will not affect the service we give you. We record privacy complaints and review them to see whether we should change how we work.

5.3 What if you are not satisfied with our answer?

You have two options, and you can use either.

The Office of the Australian Information Commissioner can investigate a privacy complaint. Contact them at GPO Box 5288, Sydney NSW 2001, on 1300 363 992, or at oaic.gov.au.

You can also go to court. Since 10 June 2025 an individual has been able to bring a claim directly for a serious invasion of privacy, without first going to the Commissioner. You would need your own legal advice about whether that is available to you.

Where your complaint is about a financial service rather than about privacy, our Financial Services Guide or website disclosure information explains how to complain and how to take the matter to the Australian Financial Complaints Authority.

Contact us

Section 6

6.1 Who do you contact?

Our Privacy Officer handles requests for access and correction, privacy questions, and privacy complaints.

PRIVACY OFFICER	Anthony Blythe
ADDRESS	PO Box 5233 Port Macquarie BC, NSW 2444
PHONE	0498 139 819
EMAIL	pensions@dbadvisers.com.au
WEBSITE	www.dbadvisers.com.au

6.2 Does this policy change?

Yes. We update this policy when the law changes, or when the way we handle your information changes.

The current version is the one published on our website. We will provide a copy on request, and the version and effective date on the front of this document tell you which version you are reading.