Privacy Policy

Date 12 September 2025

About this Privacy Policy

This Policy applies to all entities within the Guideway Group, including Guideway Wealth Pty Ltd ABN 44 156 498 529, Guideway Licensee Services Pty Ltd ABN 15 168 582 741, and Guideway Financial Services Pty Ltd ABN 46 156 498 538 (collectively known as "Guideway"), and to all Authorised Representatives and Credit Representatives acting on Guideway Financial Services Pty Ltd (**GFS**) behalf. GFS holds an Australian Financial Services Licence (AFSL # 420367) (**AFSL**) and Australian Credit Licence (ACL #420367) (**ACL**).

This Privacy Policy outlines how Guideway and GFS' Authorised Representatives (including financial advisers) and Credit Representatives (mortgage brokers) – collect, hold, use, and disclose personal information in accordance with our obligations under the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles ("APPs").

At Guideway, we understand that the privacy and security of your personal information are paramount. We are committed to ensuring your personal information is managed with integrity and care.

We are committed to ensuring our Privacy Policy is accessible and easily understood by all our clients. To this end, upon request, we will provide this policy in multiple formats (e.g., large print, audio) and explanatory notes or summaries (to clarify legal and technical language). Our team is available to answer any questions you may have about our privacy practices, ensuring you are fully informed about how your personal information is handled.

Who do I contact if I have questions about my privacy or this policy?

If you have any privacy related questions or would like further information on our information handling practices (including on how you may access and/or correct your personal information), please contact our Privacy Officer using the information below.

Mail	Privacy Officer, Guideway Financial Services Pty Ltd Level 3, 91 William St Melbourne VIC 300
Phone	1300 138 138
Email	advice@guideway.com.au

Why do we collect your personal information?

We collect, hold, use and disclose personal information to deliver financial and credit advice and services to you, as well as to provide you with related services (such as to provide you with credit assistance: see the “Mortgage Broking Services” section below). We also use personal information for related purposes including:

- complying with legal and regulatory obligations (e.g. identity verification, anti-money laundering checks);
- responding to your enquiries, requests and complaints;
- assisting you with applications or services involving Government agencies, such as Services Australia (e.g. Age Pension applications);
- arranging services through external providers (e.g. superannuation trustees, platform operators, insurers, IT or administrative service providers);
- internal functions such as record-keeping, data analytics, compliance, training and auditing; and
- communicating with, or marketing to, clients about products or services that may be of interest (with the option to opt-out of marketing at any time).

We also collect and manage personal information relating to our Authorised Representatives, Credit Representatives, employees and other business partners, to administer our business and meet legal obligations.

What information do we collect?

We only collect personal information that is reasonably necessary to provide our financial and credit services, or to comply with our legal and regulatory obligations. The type of information we collect may include (but is not limited to):

- **Identity and contact details** – name, date of birth, address, phone number, email address, residency and citizenship status.
- **Financial and employment information** – income, expenses, assets, liabilities, superannuation and investment details, insurance policies, employment and occupation details.
- **Family information** – personal information about family members if it is relevant to the advice or service being provided (for example, where family circumstances affect financial planning or insurance needs).
- **Sensitive information** – health, medical and lifestyle information where required to provide advice about life insurance, lifetime income streams or other financial products where this information is material to the advice.
- **Government identifiers** – such as Tax File Numbers (TFN), driver’s licence or passport numbers, where required or authorised by law (for example, verifying your identity, or providing TFNs to the ATO, superannuation funds or retirement income product providers). We are required to destroy or permanently de-identify TFNs when they are no longer needed for this purpose.
- **Credit information –** see the “Mortgage Broking Services” later in this document.

How do we collect personal information?

We usually collect personal information directly from you, for example when you:

- complete an identification form or other data collection documentation (such as a fact find or discovery record);
- use an online interactive tool (such as a pre-appointment questionnaire, insurance questionnaire or risk profiler);
- provide us with documents (such as bank statements, loan documents, etc.);
- complete a financial or credit product application form;
- lodge a complaint;
- create an account on www.moneyed.com.au or other MoneyED websites (which are sites licensed by us to deliver certain services); or
- communicate with us in person, by phone, email, internet or other electronic means.

We may also collect information about you from other people and organisations, including (but not limited to):

- your superfund or product issuer, whether or not they refer you to us;
- your financial adviser, mortgage broker or credit representative (who may be our Authorised Representative and Credit Representative);
- other professionals acting on your behalf, such as a lawyer or accountant;
- health professionals (with your consent, and only where relevant to the service being provided);
- other organisations who jointly provide products or services with us, such as:
    - Where your superannuation fund refers you to us to receive financial advice from one of our employed financial advisers; or
    - Where you seek advice from your superannuation fund, and the financial adviser is employed by the fund but licensed by us to provide advice.
- Government agencies (such as Services Australia, if you authorise us to act on your behalf in relation to Age Pension or other application);
- referral partners, where you have requested to be contacted for advice or credit services and they provide us with your details;
- Credit Reporting Bodies and lenders; and
- publicly available sources, including social media platforms, where the information is relevant to our relationship with you.

Choosing what information you provide

You can choose not to provide some or all of your personal information, or to deal with us anonymously or using a pseudonym where lawful and practicable. However, if you do not provide the information we request, or we cannot verify your identity, we may:

- be unable to provide you with advice or services;
- need to limit the scope of advice we give; or
- decline to provide services altogether where we have insufficient information.

In many cases, remaining anonymous or using a pseudonym will mean we can only provide you with very limited information or services, and we may be unable to meet your specific financial or credit needs.

Before you provide us with personal information about another individual (such as your partner, spouse, or another related person), you should confirm that you have their authority or consent to do so. Where practicable, you should also ensure that they are aware their personal information may be collected, used, and disclosed by us in accordance with this Privacy Policy. If you do not have their authority or consent, please do not provide their information to us. Any personal information we receive about another individual will be handled in accordance with this Privacy Policy, and they will have the same rights to access and correction as you do. When obtaining their consent, we ask that you also share a copy of this Privacy Policy and, where relevant, your adviser's Financial Services Guide or your mortgage broker's Credit Guide at that time.

How can you access and update your information?

You, or someone who is authorised to act for you, may request access to the personal information we hold about you. We will respond to access requests as soon as practicable, and within 30 days. The time required may depend on the nature of the information and whether it is held in physical or electronic form.

We will not charge you for making an access request. However, we may charge a reasonable cost for locating, copying and sending the information to you. Any applicable charges will be discussed with you before we proceed.

In some circumstances, we may refuse access where the law permits us to do so (for example, if providing access would unreasonably affect the privacy of others, or would be unlawful). If we refuse access, we will provide you with a written explanation and information on how to make a complaint.

You may also request that we correct personal information we hold about you if you believe it is inaccurate, out-of-date, incomplete, irrelevant or misleading. We will take reasonable steps to correct the information promptly and free of charge. If we do not agree that the information requires correction, we will provide you with a written explanation, note your request on our records and provide you with information on how to make a complaint.

Who we may share your information with

We may disclose your personal information to third parties where you have given your consent, where it is related to and reasonably expected in connection with the products or services we provide, or where required or authorised by law.

Depending on the service provided, we may share your information with:

- entities within the Guideway group of companies;
- people you authorise to act on your behalf, such as your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney;
- financial product and service providers, including superfunds, platform operators, insurers, lenders, credit providers, financial planning software providers and paraplanners;

- cloud and technology service providers (including Microsoft Azure, which may provide AI and data processing services to us)
- our Authorised Representative and Credit Representatives;
- medical practitioners and health service providers, where required for insurance or related advice;
- companies involved in the payments system, including financial institutions, merchants and payment processors;
- organisations engaged to support our business functions, such as auditors, compliance consultants, IT service providers, data storage providers, and marketing and communications providers;
- our professional advisers (such as solicitors and insurers), courts, tribunals and dispute resolution bodies;
- credit reporting bodies and lenders;
- other organisations that provide products or services in partnership with us, so they can provide services to you or contact you on our behalf (such as your superannuation fund); and
- regulators, Government agencies, law enforcement bodies and other parties to whom disclosure is required or authorised by law (including both Australian and overseas authorities, where applicable).

We may also disclose information about our Authorised Representatives, Credit Representatives, employees and other business partners to professional organisations, companies and consultants we engage with in connection with our business.

Overseas disclosure

Some of our providers may store or process personal information outside Australia. Set out below is a list of the most common overseas disclosures that we make.

Overseas service provider	**Disclosure purpose**	**Data storage / process location^**
LearnWorlds (CY) Ltd	To provide you with access to educational and general advice content on a MoneyED website, such as www.moneyed.com.au	United States Singapore
Calendly LLC	To arrange appointments with you to receive our services	United States
HeyGen Technologies Inc	To provide you with personalised videos and content, such as video Statement of Advice.	United States
ElevenLabs Inc	To provide you with personalised videos and content, such as video Statement of Advice.	United States
Typeform S.L (including videoAsk platform)	To collect personal information about you	United States
Zoom Video Communications Inc.	To meet with you electronically, such as a video meeting or by telephone	Australia United States
Microsoft Corporation / Azure Web Services (which involves using GPT artificial intelligence (AI) models)*	Transcription of interactions you have with us and our representations Preparation of file notes using GPT AI models Data analysis and reporting Assistance with generating and creating documents	Australia United States

^ We generally do not store your personal information overseas. Most providers listed above are used for processing and/or temporary storage only, meaning your information is processed to create an output (such as a video or draft document) but is not

retained overseas. The exception is LearnWorlds, where your full name and email address may be stored to provide you with access to education and general advice content.

* Where possible, we use Microsoft Azure services hosted in Australia. However, in some cases, when the type of AI model we use is not available within Australia, Microsoft may need to temporarily process your information in an overseas data centre. This processing is used to generate an output (such as a document or file note), and your information is not stored overseas after the processing is completed.

If you do not wish for your personal information to be disclosed overseas, please let us know. We will discuss with you whether we can provide the services you have requested without such disclosure.

Our Authorised Representative or Credit Representation may have their own arrangements in countries other than those detailed above. If so, they will disclose these arrangements separately to you.

Recording and transcription of interactions

We may record our interactions with you (including phone calls, video meetings and in-person meetings) for the purposes of maintaining accurate records, meeting compliance and legal obligations, and improving our services. Where recordings are made, we may use technology services, including artificial intelligence (AI) tools, to generate transcripts and summaries of the interaction. Recordings and transcripts are not used for marketing purposes and are only used for compliance, record-keeping and service delivery. We do not use the recording to train external AI models.

These transcripts and summaries form part of our client records and are handled in accordance with this Privacy Policy. Some transcription or data processing may be carried out by our technology service providers, which may involve overseas disclosure (see “Overseas disclosures” above).

If you do not wish for an interaction to be recorded, please let us know before or during the interaction so that we can discuss alternative arrangements.

How long do we keep your information for?

We retain personal information for as long as it is needed to provide you with our services and for as long as required or permitted by law (including the Corporations Act and National Consumer Credit Protection Act). For example, we are required to keep records of financial product advice and credit assistance for at least seven years after it is provided, and customer identification records for the duration of our relationship with you and for a further seven years after that relationship ends.

We may retain certain records for longer where it is necessary and lawful to do so. For example, to manage ongoing client relationships, respond to complaints or legal claims, comply with regulatory investigations, or meet professional indemnity insurance requirements.

When personal information is no longer required, we will take reasonable steps to securely destroy or permanently de-identify it.

How do we protect your information?

Security of your personal information

We are committed to protecting your personal information from misuse, interference and loss, and from unauthorised access, modification or disclosure, in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles.

To do this, we maintain a range of security practices and controls, including:

- **People and process measures** – ongoing staff training in privacy and cybersecurity, confidentiality agreements, and regular updates on cybersecurity developments, threats and scams.
- **Technical measures** – strong password policies, compulsory multi-factor authentication (MFA), encryption, firewalls, intrusion prevention, antivirus/antimalware tools, web/email filtering, and vulnerability management.
- **Third-party controls** – due diligence and security assessments of our external service providers, and, where possible, imposing confidentiality obligations, and contractual restrictions on the use and disclosure of personal information.
- **System safeguards** – data encryption at rest and in transit and conditional access controls.
- **External assessments** – we undergo external reviews and tests (such as penetration tests).
- We are working towards implementing the Australian Cyber Security Centre's "Essential 8" framework- Level Two.
- Our representatives are also required to protect personal information in accordance with our Information Security Policy, and we review their information security practices every two years.

Data breaches

If we become aware of a data breach involving your personal information, we will take immediate steps to contain the breach and assess the potential impact. Where the breach is likely to result in serious harm, we will notify you and the Office of the Australian Information Commissioner (OAIC) as required under the Privacy Act 1988 (Cth).

Mortgage broking services

If we provide mortgage broking services ("credit assistance"), we may collect, hold, use and disclose credit information about you. This may include:

- details of your current and past credit contracts (such as the type of credit, the amount borrowed and repayment terms);
- repayment history, default information, or information about serious credit infringements;
- credit liability information, including whether you are a guarantor for another person; and
- information contained in a credit report provided by a credit reporting body (CRB).

We collect, use and disclose this information to assess your eligibility for credit, assist you with credit (loan) applications, and assist you with managing our credit-related obligations. We may disclose your credit information to lenders, other credit providers, credit reporting bodies, and our professional advisers, auditors or service providers.

In some cases, where we assist you with a loan application, we may be required by the lender to obtain a credit report about you from a credit reporting body (CRB). This involves disclosing your personal details to the CRB so they can provide us with your credit report. The lender you apply to may also obtain a separate credit report directly from a CRB. Any such credit enquiries will be recorded on your credit file.

You may receive direct marketing information from us

We may use your personal information to send you direct marketing communications about services offered by us, our Authorised Representatives and Credit Representatives, or selected third parties (such as insurers, lenders or platform providers), where you would reasonably expect us to do so or where we have your consent.

Marketing communications may be delivered by post, telephone, email, SMS or online advertising (including targeted advertising on social media or other digital platforms To deliver these communications, we may share limited personal information (such as your name and contact details) with service providers who assist us with marketing activities. We will only do this where permitted under the Privacy Act 1988 (Cth). Where you have nominated a preferred method of communication, we will endeavour to use that method where practicable.

If you do not wish to receive direct marketing communications, you may opt out at any time by contacting us on 1300 138 138 or advice@guideway.com.au or by using the unsubscribe or opt-out function in any electronic communication. You may also let your adviser know your preferences at any time.

If you opt out of direct marketing, you may still receive communications from us that are necessary to provide our services to you, or meet our legal and regulatory obligations.

What if I have a complaint?

If you are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint, please write (preferably by email or registered letter) to our Privacy Officer using the below information.

Mail	Privacy Officer, Guideway Financial Services Pty Ltd Level 3, 91 William St Melbourne VIC 300
Phone	1300 138 138
Email	advice@guideway.com.au

We aim to acknowledge your complaint within 1 business day. If that is not possible, we will confirm receipt as soon as we can. We will then investigate the matter and aim to provide a written response within 30 calendar days. In some cases, such as complex complaints, more time may be required to complete our investigation. If this occurs, we will inform you in writing of the reasons for the delay and when you can expect a final response.

If you are not satisfied with our response, you may refer your complaint to an external body. For privacy-related complaints, you may contact the Office of the Australian Information Commissioner (OAIC):
Mail: GPO Box 5218, Sydney NSW 2001
Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au/privacy/privacy-complaints

For complaints relating to financial advice or credit services, including about interferences with privacy, you may also contact the Australian Financial Complaints Authority (AFCA):
Mail: GPO Box 3, Melbourne VIC 3001
Phone: 1800 931 678 (free call)
Email: info@afca.org.au
Website: www.afca.org.au

Changes to this Privacy Policy

Guideway is dedicated to continuously improving our privacy practices and this policy. We will conduct annual reviews of our Privacy Policy, or more frequently in response to legislative changes or significant changes to our operations. We will publish the updated privacy policy on our website https://guideway.com.au/privacy. We encourage you to check our website from time to time to view our current policy or contact us for a printed copy.