Privacy Policy

Who we are

Wealth Simplicity Pty Ltd as trustee for the MORE Wealth Trust (Wealth Simplicity) is a Corporate Authorised Representative (No. 001265502) of Wealth Simplicity Group Pty Ltd (AFSL 513615). In this policy, “we”, “us” and “our” means both entities. We are committed to protecting your privacy in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles. This policy explains what personal information we collect, how we hold, use and disclose it, and how you can access it or raise a concern.

What we collect and why

To provide financial advice, investment management and accounting and taxation services, we collect the information we need to understand your financial situation, needs and objectives. This may include your contact details, date of birth, employment details, family circumstances, and information about your assets, liabilities, income, superannuation, insurance and investments. We collect it from you over the phone, by video, face to face, through our website or client portal, or by form. We collect sensitive information (for example, health information relevant to insurance advice) only where it is needed to provide our services and with your consent.

We collect your tax file number only under your authority and only for taxation and superannuation purposes. Access to it is restricted, it is never given to external providers except as required by law or as necessary to provide our services, and it is destroyed or de-identified when no longer required. You may decline to provide it, though tax may be withheld as a result.

We also collect identity information to meet our obligations under anti-money laundering and counter-terrorism financing (AML/CTF) laws, including when we establish entities such as self-managed superannuation funds, trusts and companies for you.

Identity documents

We verify your identity electronically, and the electronic verification record is our record — we do not make or keep copies of your identity documents for verification. Where you authorise us to act on transactions for you, we hold the minimum certified identity documents needed to facilitate those transactions — usually a single certified copy. They are held in a restricted location, are never sent by email, and are destroyed when your relationship with us ends or you withdraw your authority.

How we use your information

We use your information to provide the services you have engaged us for — preparing and implementing your advice, managing your investments, preparing accounts and tax returns, and managing our relationship with you, including reviews and invoicing. We may also send you updates, articles or invitations we think will interest you; you can opt out at any time by contacting us. By engaging us, you consent to the collection, use and disclosure of your information as described in this policy.

How we use technology, including AI

We use artificial intelligence to assist in preparing documents, meeting notes and analysis. We do not use standalone or consumer AI tools — all AI capability we use is delivered inside our own secure Microsoft 365 environment, and client information never leaves that environment for AI processing. Microsoft is our service provider for this purpose. The AI models available within that environment include models developed by providers including Anthropic and OpenAI, operating as sub processors to Microsoft under contractual privacy and security obligations; client information is not used to train AI models. AI assists our work — it does not make decisions about you. Every recommendation and every document is reviewed and approved by your adviser before it reaches you. The kinds of personal information used by these tools are the kinds described in this policy.

How we hold and protect your information

Client records are held electronically in our secure, enterprise-grade Microsoft 365 environment, protected by multi-factor authentication and encryption, monitored around the clock, and backed up several times each day. Physical documents containing personal information are held securely, and mail is scanned to your client file and securely shredded once scanned or no longer required. We retain client records for at least seven years as required by law, after which information no longer required is securely destroyed or de-identified.

If a data breach occurs that is likely to result in serious harm, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) as soon as practicable under the Notifiable Data Breaches scheme.

Overseas access

Some members of our team work from overseas. They access client information only through our secure Microsoft 365 environment — the information itself remains hosted in Australia and under our control at all times, and the same confidentiality and privacy obligations apply as for our Australian-based team. We do not otherwise disclose your personal information to overseas recipients unless it is needed to implement your strategy, in which case we take reasonable steps to ensure it is handled consistently with the Australian Privacy Principles.

Who we disclose information to

We do not sell, trade or rent your personal information, and we deliberately keep the number of third parties we work with to a minimum. We disclose your information only to:

- product issuers, platforms, fund managers and insurers, as needed to implement your strategy
- your other professional advisers, with your consent
- our service providers — including IT support, software providers and outsourced administration — under confidentiality and privacy obligations
- regulators and government agencies (such as ASIC, the ATO and AUSTRAC), external dispute resolution schemes, and others where required or permitted by law.

Your choices

You may deal with us anonymously where lawful and practical, though we cannot provide personal advice without knowing who you are. If you choose not to provide information we ask for, we may not be able to provide services that are appropriate for you. If we receive unsolicited personal information, we destroy or de-identify it as soon as practicable where lawful.

Access and correction

You may ask to access or correct your personal information at any time by contacting our Privacy Officer. We do not charge for making a request; if providing the information involves a cost, we will tell you in writing before proceeding. If we refuse access or a correction, we will explain why in writing.

Questions and complaints

We welcome questions and comments about privacy. Complaints should be made in writing and will be responded to within 30 days. Contact our Privacy Officer:

Rob Gilmour
Wealth Simplicity
Suite 16.01, Level 16, 1 Castlereagh Street, Sydney NSW 2000
02 9052 6966
solutions@wealthsimplicity.com

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner at oaic.gov.au or on 1300 363 992.

Changes to this policy

We review this policy at least annually and whenever our practices change. The current version is always available at wealthsimplicity.com, with its version and date shown in the footer.