

your  
future strategy

# our guide

[yourfuturestrategy.com.au](http://yourfuturestrategy.com.au)

Financial Services Guide & Credit Guide

Issued January 2023 v4.0





# our guide

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## Your Financial Advisor Pty Ltd

ABN: 59 608 700 456

Australian Financial Services Licence

(AFSL): 481565

EDR Scheme Name: Australian Financial  
Complaints Authority

EDR Membership No: 37410

## Your Loan Broker Pty Ltd

ABN: 18 150 213 077

Australian Credit Licence: 443421 EDR

Scheme Name: Australian Financial  
Complaints Authority

EDR Membership No: 39053

Level 19, 50 Cavill Avenue,  
Surfers Paradise QLD 4217

**P. 1300 987 678**

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**E. [pressplay@yourfuturestrategy.com.au](mailto:pressplay@yourfuturestrategy.com.au)**

**W. [www.yourfuturestrategy.com.au](http://www.yourfuturestrategy.com.au)**

## THE RULES WE PLAY BY

### Financial Services Guide and Credit Guide

Your Future Strategy is passionate about helping you achieve your financial and property goals – no matter how big or small.

We take a holistic view of your situation, bringing together expertise in financial planning, self-managed super funds, insurance, property investment, property management, lending, accounting, and legal advice – all in the one place.

All of our services are on standby, ready for you to press play at a moment's notice. There's no need to press pause while we catch up on your story, as we'll have all the information we need at hand. Now that saves time and money.

Your Future Strategy is the parent company of the licensed subsidiaries that will provide you with professional advice in specific areas. Whilst the following subsidiaries all trade as Your Future Strategy, they will be referenced separately in this document so you clearly understand which entity is providing you which advice.

# preview

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## THIS IS WHAT YOU'LL FIND IN THIS GUIDE

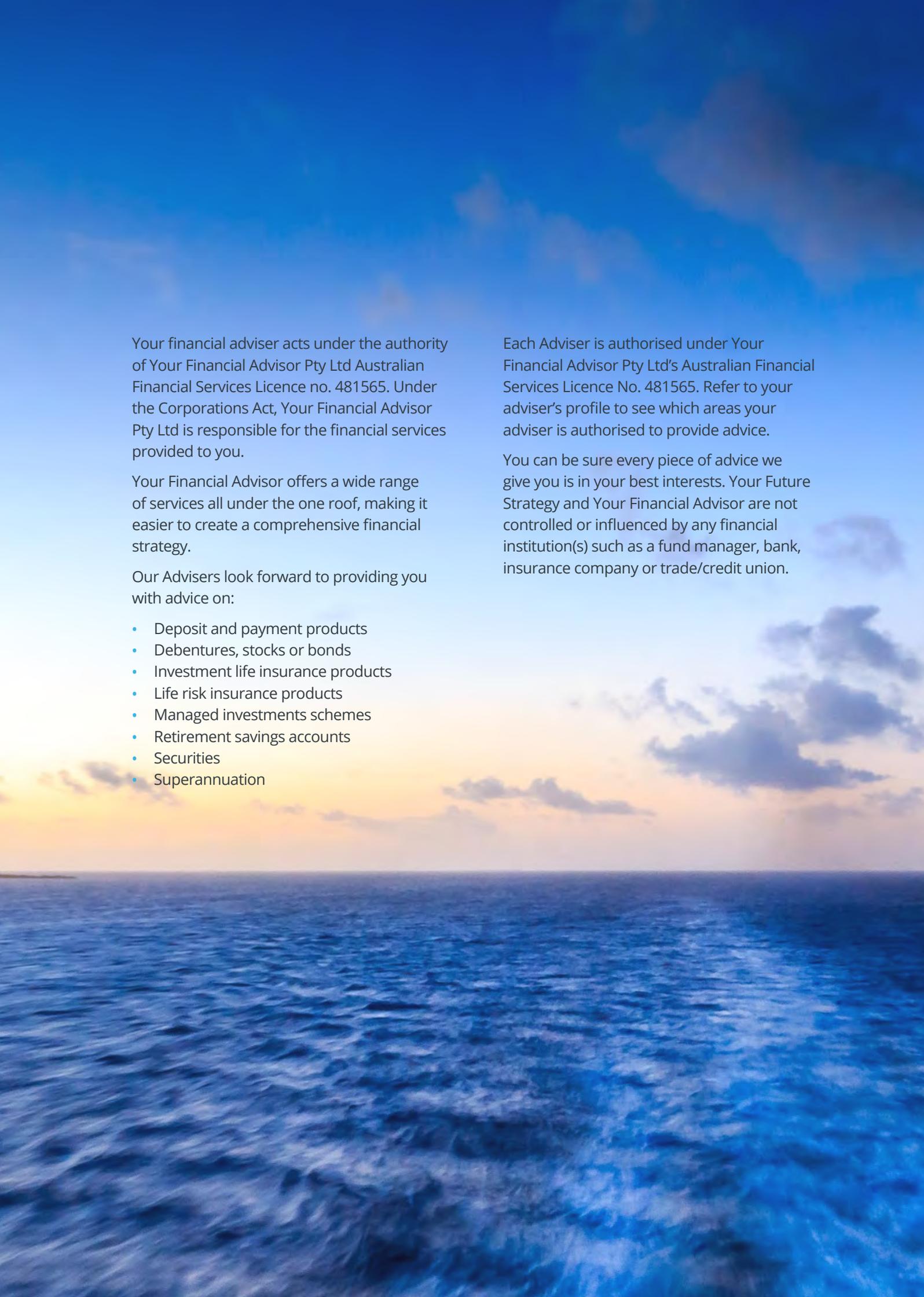
- 1. Financial Services Guide - Your Financial Advisor**
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# your financial advisor



FINANCIAL SERVICES GUIDE



Your financial adviser acts under the authority of Your Financial Advisor Pty Ltd Australian Financial Services Licence no. 481565. Under the Corporations Act, Your Financial Advisor Pty Ltd is responsible for the financial services provided to you.

Your Financial Advisor offers a wide range of services all under the one roof, making it easier to create a comprehensive financial strategy.

Our Advisers look forward to providing you with advice on:

- Deposit and payment products
- Debentures, stocks or bonds
- Investment life insurance products
- Life risk insurance products
- Managed investments schemes
- Retirement savings accounts
- Securities
- Superannuation

Each Adviser is authorised under Your Financial Advisor Pty Ltd's Australian Financial Services Licence No. 481565. Refer to your adviser's profile to see which areas your adviser is authorised to provide advice.

You can be sure every piece of advice we give you is in your best interests. Your Future Strategy and Your Financial Advisor are not controlled or influenced by any financial institution(s) such as a fund manager, bank, insurance company or trade/credit union.



# the leading role

## WHAT WE NEED FROM YOU

As the star of this show, we need you to provide us with certain information.



### Personal information

To ensure our advice is appropriate to your situation, we will ask you to provide us with accurate information regarding your personal objectives, details of your current financial situation and any other relevant information. We will provide you with a specific list of requirements tailored for you.

If you choose not to provide some or all of this information, there is a risk that any recommendations we make may not be appropriate to your needs and objectives.



### Verification

Under the Anti-Money Laundering and Counter Terrorism Finance Act, we are required to verify your identity with documents such as your passport and driver's license, and the source of any funds.

To assist verification, we will request various documents (some original) that demonstrate your financial situation, or contact third parties for further assistance.

If you choose not to provide any of these documents, unfortunately by law we cannot provide any advice, financial or credit services to you.



### Instructions

To make things easy for you, we are happy for you to choose how you would like to give us instructions – by phone, fax, letter or email.

If you choose to do this by phone, we all advise at the time that we will record the phone call. You may request a copy of the phone call at that time or for up to 90 days after.



### Storage

We must keep copies of the information for seven years. Rest assured the copies will be kept securely in accordance with our Privacy Policy. If you would like to view the information we hold about you, please ask.



# the script

## IMPORTANT DOCUMENTATION - FINANCIAL PLANNING

The most important documents you will receive from us are:

- Our Guide (Financial Services Guide)
- Advice Documents

### Financial Services Guide

This is an important document outlining information about our company and the services we provide.

It is designed to assist you in deciding whether to use any of the financial services provided by Your Financial Advisor. It is designed to clearly define our roles and responsibilities.

### Advice Documents

A Statement of Advice is a written explanation of the Adviser's advice to a client. It explains and records the advice, the reasons for the advice and how the advice is to be implemented.

Before we prepare a Statement of Advice for you, we will request information about you, your current financial situation and future needs. Our recommendations will always be thoroughly researched and suitable for your goals and objectives.

You may receive several Statements of Advice throughout our relationship, as our advice will change and grow with you.

A Statement of Advice explains in detail the strategy we are recommending to you. It will outline the fees and/or commissions, and disclose any associations we have with financial product issuers or other parties who may influence the advice we give you.

Where you receive ongoing or further advice a Statement of Further Advice (SoFA) and Record of Advice (RoA) may be provided.

If our recommendation includes a particular financial product, we will provide the relevant Product Disclosure Statement (PDS). This will help you make an informed decision.

We will explain any significant risks of the financial products and strategies we recommend to you. If we do not, please ask us to.

### Compensation Arrangements

Your Financial Advisor Pty Ltd has professional indemnity insurance as required by the Corporations Act 2001.

# our remuneration

## FEES AND COMMISSIONS

With our help, you can reach your goals and dreams. Just like the agents for the big stars, we need to be paid for our advice. Your Adviser will discuss all fees and charges with you before they provide a service. This is required of them by law, under The Corporations Act.

There are several ways we are paid for our services:

- fee for service
- commission
- brokerage
- a combination of commission and brokerage

All payments are made to the Licensee (Your Financial Advisor Pty Ltd). Your individual Adviser will receive the portion they disclose upfront in your Statement of Advice.

Details of the fees and commission for each product are contained in the Product Disclosure Statements (PDS) that your adviser will provide. Your adviser will also provide full details of fees and commissions in your Statement of Advice.

We may be paid in a number of ways including:

- fees directly paid by you
- commissions paid from risk insurers
- payments made by product providers.

An example of how commissions may be payable:

## MANAGED INVESTMENT PRODUCTS

We do not accept commissions/fees from managed investment providers. We charge an ongoing fee based on the value of the funds you invest and the financial products you use. This is in the range of 0-5%.

Your Adviser will discuss a suitable arrangement for how you would prefer to pay this fee. It can be:

- asset based and paid directly from your investment portfolio
- a direct debit payment from your bank account
- invoiced to you

Please note that the fees above are examples only. The fees you will pay depend on the services that you choose to receive, and will be discussed with you before they are charged. Your Adviser will always disclose them to you in your Statement of Advice at the time they provide the advice.

## Non-monetary benefits

From time to time advisers may receive non-monetary benefits from product providers, ranging from small benefits such as movie or sporting event tickets to more valuable benefits such as sponsorship to attended conferences.

Your Financial Advisor Pty Ltd keeps an Alternative Remuneration Register to record any benefits that are received by the company and individual adviser that exceed \$300. You may inspect this register at any time.

Life Risk Insurance Products	Upfront	Ongoing (Per Annum)
Commission	Up to 66% of the first year's premiums	Up to 22% of that year's premium
Adviser Service Fee (inclusive of GST) Based on \$1000 premium	Up to \$660	Up to \$220

## Related Entities

Your Financial Advisor Pty Ltd is

a wholly owned subsidiary of Your Future Strategy Holdings Pty Ltd.

Your Future Strategy Holdings Pty Ltd is also the ultimate holding company of a number of other related bodies corporate.

Following is a listing of those Your Future Strategy entities that you are most likely to engage with:

- Your Loan Broker Pty Ltd
- Scene Finance Pty Ltd
- Your Property Search Pty Ltd
- Legacy Property Management Pty Ltd
- Your Tax Advisor Pty Ltd Pty Ltd
- Lighthouse Property No. 1 Pty Ltd
- Lighthouse Property No. 2 Pty Ltd
- Croy Legal Pty Ltd

Your Future Strategy Holdings Pty Ltd is owned by an entity controlled by Gareth Croy.

# poor reviews

## COMPLAINTS PROCESS

We are committed to providing a high-quality service to our clients. If you are not satisfied with the service we provide, please follow the steps in our robust complaints procedure.

1. Contact your Adviser immediately.
2. If your complaint is not satisfactorily resolved within seven days, please contact the appropriate complaints officer at Your Future Strategy.

### Complaints Officer

#### **DIRECTOR - FINANCIAL PLANNING**

**P. 1300 987 678**

**E.** [complaints@yourfuturestrategy.com.au](mailto:complaints@yourfuturestrategy.com.au)

**M.** PO Box 5104, Gold Coast Mail Centre, QLD 9726

If you are not satisfied with the resolution achieved within 45 days of notifying our complaints officer, you may then seek external resolution.

### Australian Financial Complaints Authority

**P. 1800 931 678**

**W.** [www.afca.org.au](http://www.afca.org.au)

OR

### Australian Securities and Investments Commission (ASIC)

**P. 1300 300 630 (FREE CALL)**



# your loan broker

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CREDIT GUIDE



# credit guide

This Credit Guide contains important information about our company, the services we provide, fees and charges, commissions and complaint procedure.

## ABOUT YOUR CREDIT REPRESENTATIVE

Your Credit Representative acts under the authority of Your Loan Broker Pty Ltd Australian Credit Licence number 443421.

## YOUR CHOICE OF CHANNEL- LENDING

Your Future Strategy offers a wide range of services all under the one roof, making it easier to create a comprehensive financial strategy.

We provide 'credit assistance' when our credit representatives suggest or help you:

- apply for a credit contract
- increase a credit contract
- remain within a credit contract with a particular credit provider

PLEASE NOTE, we don't make any promises about the value of any property you finance with us or its future prospects. You should always rely on your own enquiries.

Your Loan Broker doesn't provide legal advice. It is important you understand your legal obligations under the loan, and the financial consequences. If you have any doubts, you should obtain legal and financial advice before you enter any loan contract.

Each credit representative is licensed under the National Consumer Credit Protection Act 2009.

## RELATIONSHIPS



### Providers

We source credit products from a range of banks, lenders and other credit providers depending on our clients needs. However, at present, we write the most loans with the following banks, lenders and other credit providers: Macquarie Bank, Bankwest, National Australia Bank (NAB), St George Bank, ANZ, Westpac, Firstmac, Connective Essentials and Scene Finance. The financiers listed are based on usage by us as the licensee not the credit representative. If you would like further details about any of these lenders, please ask us.



### Aggregator

Our aggregator charges us a fee to access their panel lenders. This fee may be made up of:

- a share of the commission that is paid by a lender for the client introduction
- a membership fee for our business
- a monthly fee for each of our accredited loan writers

If you would like us to provide an estimate of the share of the lender commission that may be retained by our aggregator, and how it is worked out, just ask.



### Referrers

We obtain referrals from a range of sources, including real estate agents, accountants, financial planners or other professionals. We may pay them a referral fee. We will disclose the actual fee in our Credit Proposal Disclosure document. If you would like us to provide an estimate and how it is worked out, just ask.



# the script

## IMPORTANT DOCUMENTATION

The three most important documents you will receive from us are:

- this one – our Credit Guide
- Preliminary Assessment
- Credit Proposal Disclosure Document

## PRELIMINARY ASSESSMENT

When we provide you with credit assistance, we must only recommend credit products that are not unsuitable for you. To be able to determine which loan products are not unsuitable, we are required to complete a Preliminary Assessment for regulated loans.

## OBTAINING A COPY OF YOUR PRELIMINARY ASSESSMENT

If we haven't already provided it to you, you may request a copy of our Preliminary Assessment.

If you request a copy:

- at any time during the first two of years of completion of the assessment, we must provide it within seven business days
- between two and seven years after it was conducted, we must provide it within 21 business days.
- There is no charge for requesting or receiving a copy of the Preliminary Assessment

## CREDIT PROPOSAL DISCLOSURE DOCUMENT

A Credit Proposal Disclosure Document will be provided before we provide credit assistance. The proposal sets out the costs of using our services, a reasonable estimate of the application fees that may apply and sets out any commissions received.



# our remuneration

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## FEES AND COMMISSIONS

With our help, you can reach your goals and dreams. Just like the agents for the big stars, we need to be paid for our advice. Your adviser will discuss all fees and charges with you before they provide a service.

There are two ways we are paid for our services:

- a fee for service which is either charged by the Licensee or Credit Representative. If applicable, the details will be provided in a Credit Quote for your approval before your finance application is lodged
- Lenders pay us a commission for introducing customers. The amount is based on the size of the loan and the loan product selected.

We will only be paid this commission if your loan is settled and drawn down. We may also be paid an ongoing commission by your lender based on the outstanding balance of your loan.

The Credit Representative may receive all or part of the commissions that the licensee receives.

You do not pay our commission – it is paid to us by the lender, or by our Aggregator.



# poor reviews

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## COMPLAINTS PROCESS

We are committed to providing a high-quality service to our clients. If you are not satisfied with the service we provide, please follow the steps in our robust complaints procedure.

1. Contact your Credit Representative immediately.
2. If your complaint is not satisfactorily resolved within seven days, please contact the appropriate complaints officer at Your Future Strategy.

Complaints Officer

**DIRECTOR - LENDING**

**P. 1300 987 678**

**E.** [complaints@yourfuturestrategy.com.au](mailto:complaints@yourfuturestrategy.com.au)

**M.** PO Box 5104, Gold Coast Mail Centre, QLD 9726

If you are not satisfied with the resolution achieved within 45 days of notifying our complaints officer, you may then seek external resolution.

Australian Financial  
Complaints Authority

**P. 1800 931 678**

**W.** [www.afca.org.au](http://www.afca.org.au)

OR

Australian Securities and  
Investments Commission (ASIC)

**P. 1300 300 630 (FREE CALL)**

# privacy policy

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Your Financial Strategy abides by the Australian Privacy Principles (APPs) which is a part of the Privacy Amendment (Enhancing Privacy Protection) Act 2012, which amends the Privacy Act 1988.

## 1. Information we collect

As a financial planning organisation we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you ("personal information"). In addition, our ability to provide you with a comprehensive financial planning and advice service is dependent on us obtaining certain personal information about you, including:

- employment details and employment history
- details of your financial needs and objectives
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, insurance cover, estate planning and superannuation
- details of your investment preferences and aversion or tolerance to risk
- information about your circumstances, family commitments and social security eligibility.

## 2. Consequences of not providing information

Failure to provide the personal information referred to above may expose you to higher risks in respect of the recommendations made to you and may affect the adequacy or appropriateness of advice we give to you. We are required pursuant to the Corporations Act to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the personal information referred to above; we may elect to withdraw our services if we believe we are unable to provide you with a complete service.

## 3. Open and transparent management of personal information

We are committed to being open and transparent about how we use personal information. Where our documents ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed. If any of our documents do not clearly state, the purposes for which we will use your personal information please ask us and we will clearly explain them to you.

We will not use your personal information for any purpose other than for which it was originally collected, unless you have given us your consent to do so, or unless it is reasonably expected that we will use the information for another purpose (a secondary purpose). An example of a secondary purpose is providing information in a court of law or dispute resolution.

Should we receive personal information that we have not asked for, we will establish whether the information could have been assessable and contained in a Commonwealth record and if the collection of this personal information was reasonably necessary or directly related to our service. Should the above not apply, we will as soon as practicable destroy the information.

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy. Unless you are informed otherwise, the personal information we hold is used for establishing and managing your financial products or services, reviewing your ongoing needs, enhancing customer service and product options and giving you ongoing information or opportunities that we believe may be relevant to your financial needs and other circumstances.

If, at any time, you do not wish to receive this information, you may contact us with this request. We will endeavour to meet your request within 2 weeks.

We maintain a register for those individuals not wanting direct marketing material. Please refer to the end of this document for our contact details.

Your Financial Advisor takes its obligations to protect your information seriously, this includes when we operate throughout Australia and overseas. As part of our operations some uses and disclosures of your information may occur outside your State or Territory and/or outside of Australia. We will obtain your consent prior to doing so.

#### 4. Information collection policy

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Generally, collection of your personal information will be effected in either face to face interview, over the telephone or by way of an online client engagement form. From time to time additional and/ or updated personal information may be collected through one or more of these methods. We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested including:

- the preparation of your financial plan
- the provision of financial planning advice to you
- making securities and investment recommendations;
- reviewing your financial plan; reviewing securities and investment recommendations;
- lodging or redeeming investments

#### 5. Information disclosure

We will not use or disclose personal information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure
- where you have consented to such disclosure
- where the National Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body

This may involve the disclosure of your personal information. We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may use the personal information collected from you for the purpose of providing you with direct marketing material, however you may, by contacting us by any of the methods detailed below, request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your personal information to superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and the commendations made by us.

In order to ensure that you receive a personal and tailored service, your personal information will be made available to other advisors or employees of Your Financial Advisor. It is a condition of our agreement with each of our advisors that they adopt and adhere to this privacy policy. You can be assured that your information will be maintained by any advisor or employee of Your Financial Advisor in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below.

We may disclose your personal information to external contractors for the following purposes:

- storing information
- audit of company accounts
- compliance framework review

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. We will confirm with external contractors that they have systems and procedures for handling personal information in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below. We will advise you of any change in business circumstances that may affect the handling of your personal information.

## 6. Storage of personal information

Your personal information is generally held in your client file. Information may also be held in a computer database. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All record movements off premises are recorded in a central register. After hours' access to our premises is controlled by allowing only personnel with security passes to access the premises. All computer based information is protected through the use of access passwords on each computer. Data is backed up each evening and stored securely off site. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off-site storage facility, and destroyed after an appropriate period of time that complies with legislative and professional requirements (usually 7- 10 years).

## 7. Access to your personal information

You may at any time, by contacting us by any of the methods detailed below, request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result. We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person
- providing access would have an unreasonable impact on the privacy of others
- the request for access is frivolous or vexatious
- the information related to existing or anticipated legal proceedings between us, and would not be discoverable in those proceedings
- providing access would reveal our intentions in

relation to negotiations with you in such a way as to prejudice those negotiations;

- providing access would be unlawful
- denying access is required, or authorised by or under law;
- providing access would be likely to prejudice certain operations by, or on behalf of an enforcement body, or an enforcement body requests that access not be provided on the grounds of national security. We will endeavour to respond to any request for access within 14 to 30 days depending on the complexity of the information and/ or the request. If your request is urgent please indicate this clearly. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

## 8. Correction of personal information

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

## 9. Notifiable Data Breaches

Entities subject to the Privacy Act 1998 (Cth) must comply with the Notifiable Data Breaches (NDB) scheme. The NDB scheme introduces an obligation to notify any individual whose personal information is involved in a data breach, where the data breach is likely to result in serious harm to an individual/s. There is also an obligation to notify the Office of the Australian Information Commissioner (AOIC) of the data breach (if the breach is unable to be sufficiently remediated). The steps are detailed in the Cyber Incident Response Plan.

### What breaches are notifiable?

An eligible data breach arises when the following three criteria are satisfied:

1. there is unauthorised access to or unauthorised disclosure of personal information, or a loss of personal information, that an entity holds
2. this is likely to result in serious harm to one or more individuals, and

3. the entity has not been able to prevent the likely risk of serious harm with remedial action

### How to assess if the information is likely to result in serious harm?

An assessment needs to be undertaken to determine whether (from the perspective of a reasonable person) the data breach would be likely to result in serious harm to an individual whose personal information was part of the data breach.

“Likely to occur” means the risk of serious harm to an individual is more probable than not (rather than possible).

“Serious harm” may include serious physical, psychological, emotional, financial or reputational harm.

AOIC provides a set of examples to help assess whether a data breach is likely to result in serious harm.

The type and the sensitivity of the information should be carefully considered. For example, the AOIC acknowledges that the following types of information may increase the risk of serious harm:

- sensitive information, such as information about an individual's health;
- documents commonly used for identity fraud (including Medicare card, driver licence, and passport details)
- financial information; or
- a combination of personal information (rather than a single piece of personal information).

### How to prevent serious harm with remedial action?

The NDB scheme provides the opportunity to take positive steps to address a data breach in a timely manner, and avoid the need to notify. If an entity takes remedial action that prevents the likelihood of serious harm occurring for any individuals whose personal information is involved in the data breach, then the breach is not an eligible data breach and does not need to be notified to the AOIC.

### Assessing a data breach and response time required

If there are grounds to believe that Your Future Strategy has experienced an eligible data breach, it must promptly notify individuals and the Commissioner about the breach, unless an exception applies. In contrast, if Your Future Strategy suspects

that it may have experienced an eligible data breach, it must quickly assess the situation to decide whether or not there has been an eligible breach. An assessment must be reasonable and expeditious, and organisations may develop their own procedures for assessing a suspected breach.

Your Future Strategy must take all reasonable steps to complete the assessment within 30 calendar days after the day the entity became aware of the grounds (or information) that caused it to suspect an eligible data breach.

### How and who to notify?

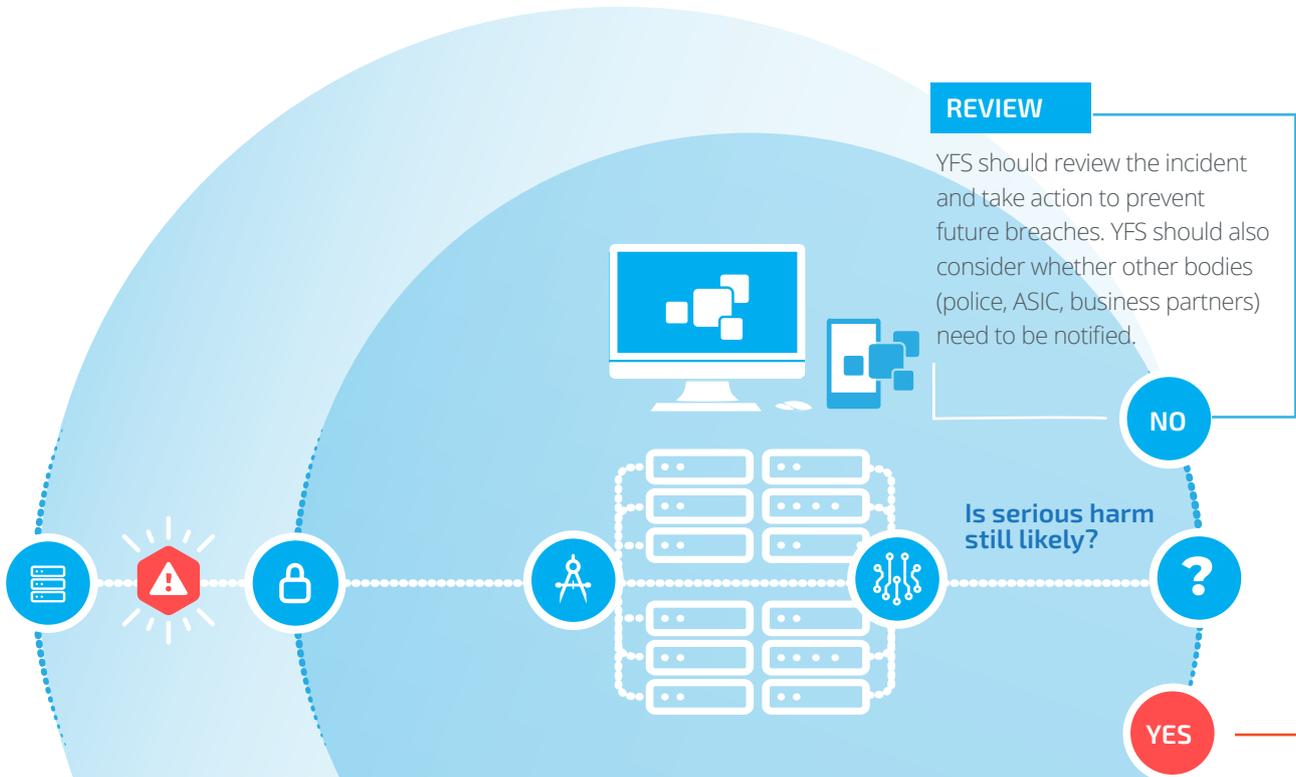
If Your Future Strategy experiences an eligible data breach, it must provide a statement to the Commissioner, and notify individuals at risk of serious harm.

The statement to the Commissioner must include: Your Future Strategy's contact details; a description of the breach; the type of information involved in the breach; and Your Financial Advisor's recommended steps for individuals. An online form is required to be completed.

There are three options for notifying individuals at risk of serious harm, depending on what is 'practicable' for Your Future Strategy.

4. Notify all individuals whose personal information was part of the data breach. This option may be appropriate, and the simplest method, if Your Future Strategy cannot reasonably assess which particular individuals are at risk of serious harm from an eligible data breach that involves personal information about many people, but where Your Future Strategy has formed the view that serious harm is likely for one or more of the individuals.
5. Notify only those individuals at risk of serious harm as a result of the data breach. If Your Future Strategy identifies that only a particular individual, or a specific subset of individuals, involved in an eligible data breach is at risk of serious harm, and can specifically identify those individuals, only those individuals need to be notified.
6. Publish notification: if neither option above is practicable, Your Future Strategy must publish a copy of the statement on the website and take reasonable steps to publicise the contents of the statements.

# Wealth Creators & Professional Advisers



## REVIEW

YFS should review the incident and take action to prevent future breaches. YFS should also consider whether other bodies (police, ASIC, business partners) need to be notified.

### Data Breach

A Suspected or known data or information security breach. A data breach is unauthorised access or disclosure of personal information, or a loss of personal information held by YFS. An information security breach is unauthorised access to the YFS systems.

### Contain

YFS should take immediate steps to contain the breach where possible. Limit any further access or distribution of the affected information, or the possible compromise of other information.

### Access

YFS needs to access whether the breach is likely to result in serious harm. The assessment process should:

- INITIATE:** appoint a lead person, make a plan and record it in the Incident register
- INVESTIGATE:** gather info (e.g. what info is affected, who had access to the info and impact)
- EVALUATE:** make an evidence based decision as to whether it is an eligible data breach.

During the assessment process, Forager should consider if remedial action is possible.

### Remedial Action

Take steps to reduce any potential harm caused by a suspected breach ( e.g. recover lost info before it is accessed). Under the NDB scheme, if remedial action is successful in preventing serious harm to affected individuals, notification is not required.

## NOTIFY

### FOR NOTIFIABLE DATA BREACHES

- Prepare a statement for the Commissioner that contains:
- YFS' contact details
- A description of the breach
- The type of information involved in the breach
- YFS' recommended steps for individuals YFS must notify affected individuals and YFS to consider which business partners to be notified

## NOTIFY

### FOR OTHER INFORMATION SECURITY BREACHES

YFS to prepare a formal notification and advise relevant business partners and consider whether ASIC needs to be notified. The notification should include a description of the breach, the assessment undertaken, any remedial action taken and recommended next steps.

## 10. Cyber Incident Response Plan

### 11. Complaints

If you wish to complain about any breach or potential breach of this privacy policy or the National Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction; however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

### 12. Policy Updates

This policy is subject to change from time to time. The most current version of our Privacy Policy can be obtained from our website ([www.yourfuturestrategy.com.au](http://www.yourfuturestrategy.com.au)) or by contacting us.

### 13. Additional privacy information

Further information on privacy in Australia may be obtained by visiting the web site of the Office of the Federal Privacy Commissioner at [www.privacy.gov.au](http://www.privacy.gov.au).

### 14. Contact details

If you have query relating to our privacy practices, please contact us at:

Compliance Coordinator  
Your Future Strategy

P O Box 5104  
Gold Coast Mail Centre  
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The logo for 'your future strategy' is contained within a blue, rounded, arrow-shaped graphic pointing to the right. The text 'your future' is in a large, white, sans-serif font, with 'strategy' in a smaller font size and a small orange triangle to its left.

**your  
future** strategy

# Wealth Creators & Professional Advisers

The background of the entire page is a long-exposure photograph of a coastal landscape at dusk. The sky is a deep blue with scattered white clouds. The water is calm, reflecting the light from the sky. In the foreground, a rocky coastline is visible on the right side, with waves gently washing onto the shore. The overall mood is serene and professional.

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