



FINANCIAL SERVICES GUIDE

Our guide to assisting you with your financial needs

Version 7.0 | 1 July 2020

LET US GUIDE YOU

The purpose of this Financial Services Guide (FSG) is to help you make an informed decision about the services we offer and whether they are appropriate to meet your needs. This FSG provides you with important information on how to engage with one of our Advisers.

This FSG should be read in conjunction with the Adviser Profile and covers the following:

- Information about Vinarc Pty Ltd as a licensee
- Details on how you may instruct your Adviser
- Who will be responsible for providing the financial services
- Details of the financial services and/or products Vinarc Pty Ltd can provide
- The documents you may receive
- Remuneration received by your Adviser
- Other forms of remuneration or benefits
- Privacy (i.e. collection and handling of your personal information)
- The complaints procedure
- Compensation arrangements in place

Please take the time to review this document before engaging our services.

Throughout this FSG, Vinarc Pty Ltd is referred to as “we”, “us”, “our” or any variations. The term “Adviser” refers to Vinarc Pty Ltd’s authorised representatives.

Vinarc Pty Ltd (ABN 92 609 798 683), is an Australian Financial Services Licensee (AFSL 484 222).

Distribution of the Financial Services Guide (version 7.0) by the providing entity has been authorised by Vinarc Pty Ltd.

Authorisation date: 1 July 2020

Who we are and what we stand for

Vinarc Pty Ltd
ABN 92 609 798 683
Level 33, 264 George Street Sydney NSW 2000
Phone: 0408 155 140

Vinarc is an Australian Financial Services Licensee (AFSL) licensed by the Australian Securities & Investment Commission (ASIC).

Vinarc is responsible for the advice and conduct of your Vinarc adviser. We are not responsible for any unauthorised services they may offer (to the full extent permitted by law), so please check the services your adviser offers in their profile.

Vinarc has professional indemnity insurance which covers us and our advisers for errors or mistakes to our services. The insurance meets the requirements of the Corporations Act 2001 (Corporations Act) and covers claims against our advisers after they cease to be engaged by us, provided that the insurer is notified of the claim when it arises and within the relevant policy period.

Our responsibility

Your Adviser provides financial advice and services on behalf of Vinarc Pty Ltd and accordingly we are responsible for the financial advice and services they provide.

Our Advisers are committed to providing quality financial advice and a wide choice of products and/or services to suit individual client circumstances.

Your Adviser is obliged by law to act in your best interests and provide appropriate advice, when providing financial advice to you.

As part of our commitment to you, Vinarc Pty Ltd advisers adhere to the Codes of Ethics/Conduct of the Association of Financial Advisers.

The adviser profile

Prior to providing any personalised financial advice products and/or services our Advisers are required to provide you with a copy of this FSG along with an Adviser Profile.

The Adviser Profile contains important information about your Adviser. This includes their Authorised Representative number and/or Corporate Authorised Representative number (if applicable), accreditations, qualifications and experience, areas of advice and types of financial services they can provide, details of how they get paid and fees that you may be charged.

If you have not received an Adviser Profile, please ask your Adviser for a copy or contact us (see page 8 for contact details)

What we can provide

Vinarc Pty Ltd is licensed to provide financial product advice on the following services:

- Financial Planning
- Investments
- Superannuation
- Retirement Planning
- Estate Planning
- Cash Management Trusts
- Gearing Strategies
- Social Security
- Wealth Creation
- Debt Management
- Life and Disability Insurance

We can advise in the following products:

- Deposit products (including basic deposit and payment products other than basic deposit products)
- Debentures, stocks or bonds issued or proposed to be issued by government
- Investment life and life risk insurance products (including any products issued by a Registered Life Insurance Company that are backed by one or more of its statutory funds)
- Interest in managed investment schemes (including investor directed portfolio services)
- Securities
- Superannuation

Vinarc Pty Ltd maintains an Approved Product List (APL). Subject to attaining required accreditation, your Adviser is able to recommend any product on the Vinarc Pty Ltd APL.

There may be instances where your Adviser will need to consider products outside of the APL. In these cases, your adviser may apply to Vinarc Pty Ltd's Research Department to obtain a one-off product approval.

Documents you may receive

If you decide to obtain personal financial advice, your Adviser will need to determine your needs, objectives and relevant financial circumstances.

At the initial advice appointment, your Adviser will typically gather the relevant information by using a client data collection form. You will be asked to provide accurate information about your personal and financial situation and keep your Adviser informed of any changes to your relevant circumstances.

Your Adviser will also need to verify your identity.

When your Adviser provides personal financial advice to you, you may receive one or more of the following documents:

- Letter of Engagement
- Statement of Advice (SoA)
- Record of Advice (RoA)
- Product Disclosure Statement (PDS)
- Fee Disclosure Statement (FDS)
- Renewal Notice

The SoA will set out the advice that has been tailored to your specific circumstances and provide you with details of all relevant disclosures including details of any remuneration payable.

Where you receive ongoing or further advice a RoA may be provided.

A PDS will be provided if a product recommendation is made and includes detailed information on the financial product including features, benefits, conditions, costs and cooling off rights (if applicable).

An FDS will be issued to you in instances where you enter into an Ongoing Fee Arrangement with your Adviser for a period greater than 12 months. The FDS will contain information about the services you were entitled to receive, the services you actually received and the fees you paid during the period. The FDS will be provided to you annually.

Should you commence an ongoing fee arrangement for the first time after 1 July 2013 (or in circumstances where the ongoing fee arrangement is significantly varied after 1 July 2013), your Adviser will also issue a Renewal Notice every 2 years. The Renewal Notice will give you the option of renewing the ongoing fee arrangement.

You may request in writing a copy of any advice document up to seven (7) years after the advice has been given.

How to give instructions

Your Adviser may accept your instructions by phone, letter, email or fax. In some instances, your Adviser can only accept written instructions from you and they will let you know when this occurs.

Your privacy

Your Adviser is required to maintain physical or electronic records of documentation for any financial advice given to you, including information that personally identifies you and/or contains information about you.

These records are required to be retained for at least seven (7) years. If you want to access your personal information at any time, please let us know.

You have the right to not to provide personal information to your Adviser. However, in this case, your Adviser will warn you about the possible consequences and how this may impact on the quality of the advice provided. Additionally, your Adviser may also decline to provide advice if they feel they have insufficient information to proceed.

Vinarc Pty Ltd respects your privacy and is committed to protecting and maintaining the security of the personal and financial information you provide us. For detailed information on how we handle your personal information, please see our Privacy Policy.

This Policy is located at on your financial advisers website and at the back of this FSG document.

Disclosure of information

Throughout the advice process, your personal information may be disclosed to other services providers. These may include:

- Financial product providers
- Financial planning software providers
- Administration and paraplanning service providers
- IT service providers

Vinarc Pty Ltd may engage third party service providers to assist in the provision of products or services.

Some services may require disclosure of personal information to service providers outside Australia including the Philippines and South Africa. The purpose of such disclosure is to facilitate the provision of financial services including the preparation of financial advice documents for Vinarc Pty Ltd Advisers.

All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act 1988.

Adviser remuneration

The cost of providing a financial product or service to you will depend on the nature and complexity of the advice, financial product and/or service provided. Generally, whenever your Adviser provides a recommendation for a financial product or service, your Adviser may be remunerated through either:

- An initial fee for service; or
- An ongoing fee for service; or
- A contribution fee or implementation fee; or
- Commission payments from product providers where applicable; or
- A combination of any of the above.

Details of the ranges and amounts of remuneration are set out below. Amounts are inclusive of GST.

Type of Remuneration	Initial	Ongoing
Adviser Service Fee*	0% to 5%	0% to 2%
SoA Preparation Fee	\$1,000 to \$10,000	N/A
Implementation Fee	\$55 to \$2,000	N/A
Hourly Rate	\$150 to \$350	\$150 to \$350
Investment Commission*	0.10% to 4.00%	0.10% to 4.00%
Insurance Commission^	0% to 66%	0% to 22%

*based on a % of funds invested

^based on a % of the premium

Prior to preparing any advice or providing financial services to you, we will discuss and agree upon all fees that will apply.

All fees or commissions are initially paid to Vinarc Pty Ltd before being distributed in full to your Adviser.

Licensee remuneration

Vinarc Pty Ltd does not receive any remuneration for the provision of services required under its Australian Financial Services Licence.

Referrals

Should you be referred to your adviser by a third party, such as an Accountant or Mortgage Broker, the third party may receive a fee for the referral. You will receive more detailed information concerning any referral fee in your SoA or other relevant document.

Other forms of remuneration or benefits

Vinarc Pty Ltd and/or its Advisers may receive non-monetary benefits where:

- The amount is less than \$300 and identical or similar benefits are not given on a frequent basis;
- The benefit has a genuine education or training purpose (including attendance to conferences) and is relevant to providing financial product advice; and/or
- The benefit consists of the provision of information technology software or support and is related to the provision of financial product advice in relation to the financial products issued or sold by the benefit provider

Payments or benefits received are disclosed in a register. A copy of the register is available upon request.

Related companies

Neither your Adviser nor the Licensee have any association or relationship with the issuers of financial products that might reasonably be expected to be capable of influencing them in the provision of financial services.

Sponsorship

Vinarc Pty Ltd and its related companies may receive payments or benefits from product providers in return for granting rights such as being recognised as a sponsor and the right to promote their product and give presentations at conferences and/or professional development training days.

Vinarc Pty Ltd may use these payments to pay for costs associated with such conferences, training or professional development days.

Professional Indemnity

Vinarc Pty Ltd maintains a group policy which includes appropriate Professional Indemnity Insurance cover for Vinarc Pty Ltd as required by the Corporations Act 2001.

Reporting Your Concerns

If you have a complaint about any financial service provided to you by your Adviser, you should take the following steps:

1. Contact the Executive Manager Governance to discuss your complaint.

Phone 0408 155 140

Email admin@vinarc.com.au

Mail Executive Manager Governance
Vinarc Pty Ltd
Level 33, 264 George Street
Sydney NSW 2000

2. We will acknowledge receipt of a complaint immediately, however, where this is not possible, acknowledgement will be made as soon as practicable.

3. We will then investigate the complaint and respond to you within 45 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution.

4. If you are not fully satisfied with our response, you have the right to lodge a complaint with the Australian Financial Complaints Authority (AFCA). AFCA provides fair and independent financial services complaint resolution that is free to consumers.

The contact details for AFCA are:

Phone 1800 931 678 (free call)

Online www.afca.org.au

Email info@afca.org.au

Mail GPO Box 3
Melbourne VIC 3001

Furthermore, the Australian Securities and Investments Commission (ASIC) has a free of charge infoline on 1300 300 630, which you may use to obtain information about your rights and to make a complaint.

CONTACT US

Vinarc Pty Ltd
Level 33, 264 George Street
Sydney NSW 2000

T: 0408 155 140

E: admin@vinarc.com.au

For more information:

Please visit moneysmart.gov.au for more information on financial advice.

Vinarc



PRIVACY POLICY

Release Date | 1 July 2020

DISCLAIMER

The information presented in this document is the interpretation of Vinarc Pty Ltd in relation to the Privacy Act 1988 and the Australian Policy Principles. Licensees should review and make adjustments relevant to their businesses. Should you require specialist advice in relation to this area you should contact a lawyer or other suitably qualified professional.

VINARC PTY LTD PRIVACY POLICY

At Vinarc Pty Ltd (The Licensee), we understand that the privacy of your information is important to you and we respect the confidentiality of the information that you provide to us. Protecting your information is an important part of maintaining trust between us and our clients and by handling information in a secure manner we build strong business relationships.

This document provides information and details about how we manage the personal information that we collect, hold, use and disclose about individuals.

The Privacy Policy applies to all organisations within the Licensee and all subsidiary companies which are set out at the end of this policy. We are bound by the Privacy Act and we manage and protect your personal information in accordance with the Australian Privacy Principles.

Why we collect and use personal information

We collect, hold and use and disclose personal information so we can provide you with financial and credit products, advice and service relevant to your needs. We may also collect, use and disclose your information for related purposes such as:

- Complying with legal obligations, such as verifying your identity
- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Internal operations, such as record keeping, data analytics, auditing or training
- Promotion of other products and services that may be of interest to you

We collect, use, hold and sometimes disclose personal information about financial advisers and other people who we do business with (including employees) in order to administer and manage our business operations. This information is afforded the same standard of care as that of our clients.

What personal information we collect

We ask people for a range of personal information to assist us in providing relevant products and services. The information we collect could include (but is not limited to) your name, date of birth, contact details, financial information, employment details, residency, and citizenship status. We may also collect the personal information of your family members where it is relevant to the advice being provided.

We may also collect sensitive information about your medical history and their health and lifestyle to provide financial advice about life insurance products.

In most instances, we collect personal information directly from that person when they:

- Complete a financial product or credit product application form,
- Complete an identification form,
- Complete data collection documentation,
- Interact with online interactive tool, such as a budget planner,
- Provide documentation to us, or
- When you communicate with us in person, over the telephone, fax, e-mail, internet or by using other electronic devices.

Situations where we collect personal information from other people and organisations include (but are not limited to):

- A financial adviser,
- A mortgage broker or other credit representative,
- Other professionals who act on your behalf, such as lawyer or accountant,
- Health professionals,
- Other organisations who jointly with us, provide products or services to you, and
- Social media and publicity available sites.

It is your choice whether to provide your personal information. You have the right to not provide personal information, including about your identity. However, in this case, your adviser will warn you about the possible consequences and how this may impact on the quality of the advice provided. Your adviser may also decline to provide advice if they feel they have insufficient information to proceed. In some instances, we will decline to provide services or advice if we feel we have insufficient information for the scope of the service or advice requested.

Further, in some circumstances the law requires us to obtain and verify details of photographic and non-photographic identification documents.

Cookies and other web technologies we use

Some personal information may be collected automatically, without your knowledge, whilst navigating through and interacting with the content of our websites. The electronic methods of collection we use include cookies, log files and web beacons.

Cookies are a small text or pixel file stored on your device that records information about your visit to our websites. We use cookies to improve your website experience, to serve you with relevant information and to manage your access to certain parts of our websites. You can choose if and how a cookie will be accepted by changing your browsing settings; but please be aware that this may affect your access to some parts of our websites.

Web beacons are small pixel files that help us better manage content on our websites by allowing us to understand usage patterns, fix issues, and improve the products and services offered to you on our websites. Log files contain information about the devices and browsers used to access our websites and help us to diagnose problems, analyse trends and administer the site or mobile application.

The information we collect by these electronic means is generally not stored for long – they are temporary records – and can include device-specific data or log data such as your IP address, device screen size, device type, browser information, referring domain, pages visited, the date and time website pages where visited, and geographic location (country only).

Accessing and updating personal information

You can request access to personal information we hold. There may be a cost involved with locating, copying, or sending you the information you request. The cost will be discussed and agreed with you at the time.

There may be circumstances where we refuse to provide you with the information you request, for example when the information is commercially sensitive. In these situations, we will inform you and provide an explanation as to why.

We will deal with requests for access to your personal information as soon as possible and aim to respond within 30 days. The time we require will depend on the type of information requested.

We will update your personal information if you contact us. In most cases, you can update your personal information over the phone, by contacting your adviser or broker or electronically.

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may only be able to provide you with limited information or services. In many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

Who we share personal information with

From time to time we may share your personal information with other entities both within and outside of the Licensee.

This will vary according to the product or service involved, but could include:

- Any person acting on your behalf, including your financial adviser, solicitor, accountant, executor, administrator, trustee, guardian or attorney
- Financial product and service providers, including financial planning software providers and paraplanners
- For corporate superannuation members, your employer or your employer's financial adviser
- Lenders and other credit providers
- Other organisations within the Licensee including related bodies corporate and advice firms we have authorised
- Medical practitioners and health service providers, such as pathology services
- Companies involved in the payments system including financial institutions, merchants and payment organisations
- Organisations who assist us with certain business functions, compliance consultants, direct marketing, debt recovery and information and communication technology support
- Our solicitors, our insurers, courts, tribunals and dispute resolution organisations
- Other organisations who provide us with products and services so that they may provide their products and services to you or contact you on our behalf, and/or
- Anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information to (for example, law enforcement agencies, Australian and international government and regulatory authorities).

We may also disclose your information to a third party where you have given your consent or where you would reasonably expect us to disclose your information to that third party.

We may also disclose the personal information we hold about our financial advisers to professional organisations, companies and consultants that we work with.

The only circumstances in which we would collect, use or disclose your government related identifiers is where we are required or authorised by law to do so. For example, we may be required to disclose your Tax File Number (TFN) to the Australian Taxation Office, a superannuation or retirement income product provider. Likewise, we may need to disclose your Medicare number to Centrelink in order to assess your social security eligibility. Driver's license numbers and passport numbers may also be collected when we are required to verify your identity.

Personal information collected may also be used for direct marketing purposes to promote events, products, or services that may be of relevance to you. Please contact us should you wish not to receive direct marketing.

Disclosure of personal information overseas

We may disclose your personal information to service providers who operate outside Australia including the same purposes as in 'Why do we collect personal information?'

The most common example of when we share your personal information overseas is when we work with overseas service providers who prepare financial advice documents, at present we have support form staff based in the Philippines and South Africa.

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

Your adviser may enter into their own outsourcing arrangements to countries other than those detailed above. If so, your adviser will disclose these arrangements separately to you. All reasonable steps will be taken to ensure that offshore service providers comply with the Privacy Act.

Personal Information is generally hosted on servers located in Australia but due to companies like Dropbox we utilise their secure storage servers which are hosted in the US and EU zones. If you access our services from outside Australia, you consent to the transfer of your personal information to Australia, a jurisdiction that may not provide the same high level of protection we apply in Australia.

How we protect personal information

We strive to ensure that the personal information that you provide to us is stored safely and securely. We take a number of precautions to protect the personal information we hold about you from misuse, interference, and loss, and from unauthorised access, modifications or disclosure.

We have a range of practices and policies in place to protect personal information we hold, including:

- Educating our staff and representatives about how to protect your personal information and updating them about cyber security developments, threats and scams,
- Requiring our staff and representatives to use passwords when accessing our systems,
- Where appropriate, using strict confidentiality arrangements restricting third parties' use or disclosure of personal information for any unauthorised purposes,
- Employing physical and electronic means, including access controls (as required) to protect against unauthorised access to buildings,
- Employing firewalls, intrusion prevention systems and virus scanning tools to protect against unauthorised persons, malware and viruses from entering our systems,
- Some of the systems we use are on dedicated secure networks or transmit electronic data via encryption, and
- Providing secure storage for physical records and securing paper files in locked cabinets and physical access restrictions.

Where personal information is no longer required, we take steps to de-identify or destroy the information in a secure manner.

Complaints about privacy

If you have any queries or are concerned about how your personal information has been collected, used or disclosed and you wish to make a complaint, please contact the Privacy Officer on the information below:

Mail	:	Level 33, 264 George St., Sydney NSW 2000
Phone	:	0408 155 140
E-mail	:	admin@vinarc.com.au

We will acknowledge receipt of a complaint immediately, however, where this is not possible, acknowledgement will be made as soon as practicable. We will then investigate the complaint and respond to you within 45 days. Some complex matters may require an extension to thoroughly investigate the complaint and bring it to resolution.

If you are not fully satisfied with our response, you can contact an external body. In cases of privacy related complaints, this is generally the Office of the Australian Information Commissioner (OAIC). The contact details are:

Mail	:	GPO Box 5218 Sydney NSW 2001
Phone	:	1 300 363 992
E-mail	:	enquiries@oaic.gov.au
Online	:	www.oaic.gov.au

For all complaints or concerns, you can contact the Australian Financial Complaints Authority:

Mail	:	GPO Box 3 Melbourne VIC 3001
Phone	:	1 800 931 678 (free call)
E-mail	:	info@afca.org.au
Online	:	www.afca.org.au

ABOUT THIS POLICY

We may amend or update our Privacy Policy as required by law or as our business process or technology changes. We will post the updated policy on our website. We encourage you to check our website from time to time to view our current policy or contact us for a printed copy.