Avana Financial Solutions Pty Ltd

Privacy Policy

January 2026

Overview

Avana Financial Solutions consists of:

- **Licence Number:** 516325
- **Licence Type:** Australian Financial Services Licence (AFSL)
- **Licensee:** Avana Financial Solutions Pty Ltd

Avana Financial Solutions is committed to complying with its obligations under the Corporations Act 2001 (Cth), including the obligation to have adequate risk management systems and to ensure its representatives comply with financial services laws.

The development and maintenance of this Privacy Policy is a core component of Avana Financial Solutions' Compliance Plan, Risk Management Framework and Licence Manual.

Purpose

The purpose of this Privacy Policy is to outline how Avana Financial Solutions, its officers, advisers, authorised representatives, agents and employees collect, use, disclose and retain personal and sensitive information.

Avana Financial Solutions handles personal information in accordance with:

- the **Privacy Act 1988 (Cth)**
- the **Australian Privacy Principles (APPs)**
- the **Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth)**

This Policy provides guidance to ensure Avana Financial Solutions and its representatives meet their privacy obligations.

Policy

This Policy applies to all officers, advisers, authorised representatives, contractors, employees, clients and shareholders of Avana Financial Solutions.

Avana Financial Solutions acknowledges that some advisers or agents may operate businesses that would otherwise qualify as a small business operator under the Privacy Act. However, where those advisers or agents act as Authorised Representatives of Avana Financial Solutions, they are required to comply with this Policy and the APPs.

For the purposes of the Privacy Act, the obligations imposed on Avana Financial Solutions also apply to its advisers and authorised representatives.

Definition

Personal information means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether recorded in a material form or not.

Examples include, but are not limited to:

- name, address and contact details
- date of birth
- employment and income details
- financial information
- identification documents
- tax-related information

Sensitive information has the meaning given in the Privacy Act and includes health information and other categories requiring higher protection.

Commitment

Avana Financial Solutions recognises that privacy is fundamental to client trust.

Avana Financial Solutions is committed to complying with the Australian Privacy Principles and ensuring that its advisers and authorised representatives understand and apply their obligations under this Policy.

APP 1 – OPEN AND TRANSPARENT MANAGEMENT OF PERSONAL INFORMATION

Avana Financial Solutions will take reasonable steps to:

a) implement practices, procedures and systems to ensure compliance with the APPs;
b) maintain a clearly expressed and up-to-date Privacy Policy; and
c) make this Policy available free of charge.

Avana Financial Solutions requires that:

- advisers and staff understand their privacy obligations;
- privacy-related complaints are referred immediately to the Compliance Team;
- clients are able to access their personal information upon request.

This Policy is available on Avana Financial Solutions' website and must be made available to clients on request.

APP 2 – ANONYMITY AND PSEUDONYMITY

Individuals must have the option of dealing anonymously or by pseudonym where practicable.

Due to the nature of financial services and obligations under the AML/CTF Act, it is generally impracticable for Avana Financial Solutions or its representatives to provide services without client identification.

APP 3 – COLLECTION OF SOLICITED PERSONAL INFORMATION

Avana Financial Solutions collects personal information that is reasonably necessary for the provision of financial services.

Personal information may be collected to provide:

- financial advice
- insurance and risk services
- financial product implementation
- cashflow and wealth management services

Sensitive information will only be collected where:

- the individual has consented; and
- the information is necessary for the provision of services.

APP 4 – DEALING WITH UNSOLICITED PERSONAL INFORMATION

If unsolicited personal information is received, Avana Financial Solutions will assess whether it could have been collected under APP 3.

If not, the information will be destroyed or de-identified as soon as practicable, where lawful and reasonable to do so.

APP 5 – NOTIFICATION OF COLLECTION

When personal information is collected, reasonable steps will be taken to notify the individual of:

- Avana Financial Solutions' identity and contact details
- the purpose of collection
- consequences if information is not provided
- usual disclosures, including overseas disclosures
- how to access and correct information

APP 6 – USE OR DISCLOSURE OF PERSONAL INFORMATION

Personal information will only be used or disclosed for the primary purpose of collection or a related purpose reasonably expected by the client, unless otherwise permitted or required by law.

Personal information may be disclosed to:

- product providers
- insurers
- outsourced service providers
- accountants and Tax Relevant Providers
- regulators where required

Any secondary use or disclosure outside these parameters must be approved by the Compliance Team.

APP 7 – DIRECT MARKETING

Avana Financial Solutions and its representatives may use personal information for direct marketing where permitted by law.

Individuals may opt out of receiving direct marketing communications at any time.

Sensitive information will not be used for direct marketing without consent.

APP 8 – CROSS-BORDER DISCLOSURE

Avana Financial Solutions may disclose personal information to overseas recipients, including outsourced service providers (such as paraplanning providers in the Philippines).

Reasonable steps are taken to ensure overseas recipients do not breach the APPs, unless an exception applies.

Client consent will be obtained where required.

APP 9 – GOVERNMENT RELATED IDENTIFIERS

Avana Financial Solutions must not adopt or use government-related identifiers (such as tax file numbers) as its own identifiers, except where permitted by law.

APP 10 – QUALITY OF PERSONAL INFORMATION

Avana Financial Solutions takes reasonable steps to ensure personal information is accurate, up to date and complete.

APP 11 – SECURITY OF PERSONAL INFORMATION

Avana Financial Solutions takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

These steps include secure systems, access controls, confidentiality obligations and secure storage.

APP 12 & 13 – ACCESS AND CORRECTION

Individuals may request access to, or correction of, their personal information.

Requests must be handled within a reasonable timeframe and in accordance with the Privacy Act.

Data Breaches

Avana Financial Solutions maintains procedures to identify and respond to data breaches.

Where a data breach is likely to result in serious harm, Avana Financial Solutions will respond in accordance with the Notifiable Data Breaches scheme, including notification to affected individuals and the OAIC where required.

Privacy Complaints

Privacy complaints should be directed to:

Privacy Officer
Avana Financial Solutions Pty Ltd
Unit 260, 88 Kavanagh Street
Southbank VIC 3006
Phone: 0426 981 818
Email: compliance@avana.com.au

Complaints will be acknowledged promptly and responded to within 45 days.