FRESHWATER ASSOCIATES

ADVISORS TO ASPIRATION



PRIVACY POLICY

Freshwater Associates

24 November 2026

JC Private Clients Pty Ltd t/as
Freshwater Associates

Privacy Policy

This privacy policy outlines how JC Private Clients Pty Ltd trading as Freshwater Associates ('we', 'us' or 'our') manage your personal information. It also sets out generally what sort of personal information we hold, for what purposes and how we collect, hold, use and disclose that information.

The privacy of your personal information is important to us. We are required to comply with the Australian Privacy Principles. We will comply with the Australian Privacy Principles as well as other applicable laws affecting your personal information.

Collecting Your Personal Information

Your personal information will be collected and held by us, as JC Private Clients Pty Ltd trading as Freshwater Associates of Consultum Financial Advisers Pty Ltd, an Australian Financial Services Licensee (Licensee), for the purposes of:

- providing you with the advisory services that you have requested;
- managing our relationship with you, including management and administration tasks such as answering your requests and concerns, conducting market research and taking any required legal action;
- completing documentation and forms, including identifying you or verifying your authority to act on behalf of a customer in order to comply with the 'Customer Due Diligence' requirements in the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act).
- protect our business and other clients from fraudulent or unlawful activity;
- to comply with relevant laws, regulations, and other legal obligations;
- to help us improve the products and services offered to our clients, including contacting you about products and services in which you may be interested; and
- for any purpose for which you have given your consent.

You can let us know at any time if you no longer wish to receive direct marketing offers. Contact us at:

Phone: (03) 9629 8188

Email: admin@fwadvice.com.au

We will process your request as soon as practicable.

To enable your financial adviser to provide you with financial advice you request that is suitable for your investment objectives, financial situation and particular needs we need to obtain and hold personal information about you. This includes:

- your name, contact details and date of birth;
- employment details and history;
- financial details including information about your financial needs and objectives, your current financial circumstances including your assets and liabilities, income, expenditure, insurance cover and superannuation;
- details of your investment preferences and risk tolerance;
- family circumstances and social security eligibility; and
- any other information that we consider necessary.

The personal information collected may include sensitive information such as health information and memberships of professional or trade associations.

If it is reasonable and practicable, we will only collect your personal information from you. Generally, your personal information will be collected when you meet with your adviser in person, provide your adviser

with information over the telephone or with written material. We may need to collect personal information from third parties, such as your accountant, or others whom we believe you have authorized to provide information to us.

We may receive personal information about you when we have taken no active steps to collect that information. We destroy all unsolicited personal information, unless the personal information is relevant to our purposes for collecting personal information.

How Your Personal Information is Held

Your personal information is generally held in client files or a computer database. Your personal information may also be held in a secure archiving facility.

We take reasonable steps to ensure that the personal information that we hold is protected from misuse and loss and from unauthorised access, modification and disclosure. Some of the measures that we have adopted are having facilities for the secure storage of personal information, having secure offices and access controls for our computer systems.

We will also take reasonable steps to destroy or permanently de-identify personal information that we no longer need for any purpose for which it may be used or disclosed under the Australian Privacy Principles.

Using and Disclosing Your Personal Information

Your personal information may be disclosed for purposes related to the provision of the financial advice you have requested. The types of service providers and other third parties that may be provided with your personal information are:

- our Licensee, who provide us with our financial planning software and compliance support services;
- other financial advisers and organisations involved in providing the financial advice you have requested (which may include ongoing service) such as fund managers who assist us in providing financial advice and paraplanners;
- insurance providers, superannuation trustees and product issuers in connection with the provision to you of the financial advice you have requested;
- a superannuation trustee or other product provider who you have authorised to deduct advice-related costs from your superannuation or investment fund who has requested to review a copy of your Statement of Advice to satisfy their legal obligations;
- organisations that assist in operating a financial planning business such as those that provide administrative, financial, accounting, insurance, research, legal, computer or other business services;
- your representatives or service providers such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business or the due diligence procedures prior to any such sale or transfer;
- government authorities and other organisations when required by law; and
- organisations that you have consented to your personal information being disclosed to.

In addition to the purposes of collection set out above, your personal information may also be used in connection with such purposes.

We will seek to ensure that your personal information is not used or disclosed for any purpose other than:

- the primary purpose for which it was collected or a related secondary purpose;
- where you have consented to the use or disclosure; or

- in other circumstances where the Australian Privacy Principles authorise the use or disclosure such as when it is required by or authorised under law.

We may disclose your personal information to third parties who provide services to us, in which case we will seek to ensure that the personal information is held, used or disclosed consistently with the Australian Privacy Principles.

Automated Decision-Making Disclosure

Kinds of Decisions Assisted by a Program

We may use a number of software tools to help make decisions about financial product and strategies, which may be appropriate for your needs.

These tools are primarily accessed either through the Xplan Financial Planning software, operated by Iress Ltd, or the Wealth Central Financial Planning software, operated by Insignia Financial Ltd, however we may use additional software tools from time to time.

Together these software tools enable your financial adviser to perform financial modelling, calculations and projections to develop financial planning strategies for you, as well as identify financial products and investment portfolios that may be appropriate for your needs, and whether you may be eligible to access various product features or benefits.

These tools also provide risk profiling assessments through psychometric questionnaires to assist in determining your tolerance to risk and a corresponding level of exposure to growth and defensive assets within an investment portfolio.

Your financial adviser always remains responsible for providing financial advice which is in your best interests. We do not use fully automated computer programs to make sole or final decisions regarding your financial advice, product recommendations, or strategies without human intervention.

Kinds of Personal Information Used

In order to utilise these tools, you and/or your financial adviser may be required to provide the following kinds of personal information, including your name, address, date of birth, income, assets, liabilities and health information.:

Demographic details: Name, age, gender, relationship status, and details of dependents.

Financial profile: Income, expenses, assets, liabilities, tax structures, and existing superannuation or investment product balances.

Risk and objectives: Investment risk tolerance scores, retirement timelines, and financial goals.

Sensitive information such as your medical history, health status, and smoking status (utilized specifically for assessing insurance eligibility and coverage needs.

Artificial intelligence (AI)

We may use AI tools as part of our business operations, including for internal purposes and as part of our financial advice process. We may only use AI tools approved by our Australian Financial Services Licensee and must handle personal information, in accordance with this privacy policy.

The AI tools we use we may also engage third-party AI and large language model (LLM) providers. Where AI tools are provided by third parties (including cloud-based services), we will take reasonable steps to ensure your information is handled securely and in accordance with Australian privacy laws. We will also take reasonable steps to ensure these third-party LLM providers to use your personal information to train their models.

Organisations outside Australia

In order to provide you with our services, we may need to share your information with organisations outside Australia (for example Information Technology providers) – these countries include:

Sri Lanka

We may store your information in the cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. Overseas organisations may be required to disclose information we share with them under a foreign law.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the Australian Privacy Principles;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

Accessing your Personal Information

You can gain access to your personal information that we hold. This is subject to exceptions allowed by law such as where providing you with access would have an unreasonable impact upon the privacy of others. If we deny a request for access we will provide you with the reasons for this decision. To request access please contact us (see "Contacting Us and Privacy Issues" below).

Correcting Your Personal Information

We take reasonable steps to ensure that the personal information that we collect, use or disclose is accurate, complete and up-to-date. If you believe that any of the personal information that we hold is not accurate, complete or up-to-date please contact us (see "Contacting Us and Privacy Issues" below) and let us know what information is incorrect.

If we agree that the personal information requires correcting we will take reasonable steps to do so. If we do not correct your personal information we will provide you with the reasons for not doing so.

Contacting Us and Privacy Issues

You can obtain further information on request about the way in which we manage the personal information that we hold or you can raise any privacy issues with us, including a complaint about privacy, by contacting us using the details below.

Cameron Obliubek (Director)

Phone: (03) 9629 8188

Email: cobliubek@fwadvice.com.au

Jason Galea (Director)

Phone: (03) 9629 8188

Email: jgalea@fwadvice.com.au

We are committed to working with you to resolve a complaint involving your personal information. However, if you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concerns to:

Office of the Australian Information Commissioner

- www.oaic.gov.au/privacy
- Phone: 1300 363 992
- Email: enquiries@oaic.gov.au

Or

- Australian Financial Complaints Authority (AFCA)
- Website: www.afca.org.au
- Email: info@afca.org.au
- Telephone: 1800 931 678 (free call)
- In writing to: Australian Financial Complaints Authority GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires