

AgeingWithGrace

Advisory

Ageing With Grace Advisory Pty Ltd

Privacy Policy

AFSL 515107

6th February 2026



Navigating Aged Care, *Together.*

Our Commitment to Your Privacy

Ageing with Grace Advisory Pty Ltd (ABN 52 684 772 487), a Corporate Authorised Representative of SWM (Aust) Pty Ltd (ABN 79 631 564 853, AFSL 515107), respects your right to privacy and is committed to protecting the personal information we collect.

We handle personal information in accordance with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

We are also bound by obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), the Insurance Contracts Act 1984 (Cth), the Income Tax Assessment Acts, and the Notifiable Data Breaches (NDB) Scheme.

This policy explains how we collect, hold, use and disclose your personal information, and how you can access or correct it or make a privacy complaint.

1. What We Collect

We collect personal information that helps us provide financial advice and related services. This may include:

- Identity details (name, date of birth, address, contact details);
- Financial, tax, banking, and employment details;
- Superannuation and investment information;
- Insurance information (including policy details and claims history);
- Aged care information (including aged care agreements, Centrelink details, accommodation payment information and assessments);
- Health information (where required to provide advice);
- Sensitive information (such as health information) only with your consent or where permitted by law.

Tax File Numbers (TFNs)

Where relevant to providing financial advice (for example, in relation to superannuation, managed funds or tax reporting), we may collect your Tax File Number (TFN). We only collect TFNs where authorised by law and we handle them in accordance with the Tax File Number Guidelines under the Privacy Act. TFNs are stored securely and are not used for marketing purposes.

If you choose not to provide required information, we may be unable to offer, manage or implement our services effectively.

2. How We Collect Information

We usually collect information directly from you – through meetings, phone calls, forms, our website, our secure client portal, or secure electronic communication.

We may also collect information from:

- Your authorised representatives (e.g., accountant, solicitor, executor, attorney or guardian);
- Employers, superannuation funds, insurers, banks or other financial institutions;
- Aged care providers and aged care accommodation facilities;
- Centrelink and other government agencies (where authorised);
- Public registers and verification providers.

Identity Verification

To comply with our legal obligations (including AML/CTF requirements), we may collect documents or information to verify your identity. This may include using electronic verification services and third-party systems.

Fraud, Spoofing and Scam Protection

Our organisation is committed to protecting clients and employees from fraudulent or “spoof” emails – messages that appear legitimate but are sent in a malicious manner.

To safeguard against spoofing:

1. **Secure communication:** We generally use our secure client portal for sensitive documents and requests.
2. **Verification:** Official emails will include the sender’s name, address, and a clear subject line.
3. **Links and attachments:** We will not generally request sensitive personal information via email and may direct you to our secure portal.
4. **Professional tone:** We will never use threats or intimidation in email communication.
5. **Employee training:** Staff receive regular education on identifying and reporting spoof emails and phishing attempts.
6. **System monitoring:** Our systems are monitored for suspicious activity, and any incidents are promptly investigated.

If you are ever unsure about the legitimacy of an email, please contact us by phone before responding.

3. Why We Collect, Use and Disclose Information

We collect, use and disclose personal information to:

- Provide, manage, and improve our financial advice and related services;
- Prepare Statements of Advice (SOAs), Records of Advice (ROAs), aged care strategies and implementation documentation;

- Verify your identity and meet legal obligations (including AML/CTF requirements);
- Comply with professional, regulatory and licensee obligations (including under ASIC regulatory requirements);
- Prevent fraud, cybercrime, and unauthorised access;
- Maintain records and meet compliance, audit and reporting requirements;
- Communicate with you about your advice, products, services and ongoing engagement;
- Provide you with information about products and services that may be relevant (you may opt out at any time).

4. How We Store and Protect Your Information

Your information is stored securely in Australia in either electronic or paper form.

We apply strict access controls, staff training, secure password systems, encryption and monitoring processes to protect information from misuse, loss, unauthorised access, modification or disclosure.

Record Retention

We are required by law to retain certain records (including financial advice records) for a minimum period, generally **at least seven (7) years**, and sometimes longer depending on the nature of the services provided.

When personal information is no longer required, and we are not legally required to retain it, it will be securely destroyed or de-identified.

Notifiable Data Breaches

If a data breach occurs that is likely to result in serious harm to individuals, we will notify affected individuals and the Office of the Australian Information Commissioner (OAIC) in accordance with the Notifiable Data Breaches (NDB) Scheme.

5. Disclosure to Third Parties and Overseas

We may share personal information with:

- Insurers, fund managers, banks and superannuation providers;
- Aged care providers and accommodation facilities (where required to implement aged care advice);
- IT, software, and administrative service providers (including cloud storage providers);
- External paraplanners, accountants, and professional advisers (with your consent where required);
- Auditors, compliance bodies, and regulators (e.g., ASIC, AUSTRAC, ATO, Centrelink);
- SWM (Aust) Pty Ltd (AFSL 515107), as our licensee, for supervision, monitoring, compliance, audit, training and regulatory purposes;
- Any other third party where required or authorised by law.

Overseas Disclosure

Most data is stored in Australia. However, some of our third-party service providers (such as cloud-based software providers) may store or process information overseas, including in jurisdictions such as the United States, New Zealand, Singapore or other countries.

Where overseas disclosure occurs, we take reasonable steps to ensure overseas recipients handle personal information in a manner consistent with the Australian Privacy Principles (APP 8).

6. Marketing and Communication

We may contact you about products and services that may be relevant to you.

We will only send marketing communications where permitted by law, including under the Privacy Act and the Spam Act 2003 (Cth).

You may opt out of marketing communications at any time by contacting us at support@awgadvisory.com.au or by using any unsubscribe function provided.

7. Access and Correction

You may request access to, or correction of, your personal information by contacting us at support@awgadvisory.com.au.

We will respond within a reasonable timeframe. In some circumstances, we may charge a small administrative fee for providing access.

If we refuse your request, we will provide written reasons and information on how to lodge a complaint.

8. Complaints and Further Assistance

If you have a concern about how we handle your personal information, you may contact us using the details below.

When lodging a privacy complaint, please include your name, contact details and a description of your concern, along with any supporting documentation.

Email: compliance@storywealth.com.au

Phone: 1300 000 165

We will acknowledge your complaint within a reasonable timeframe (generally within 24 hours of receipt). We will investigate your concern and respond as soon as possible.

Where your complaint relates to our financial services obligations, we will handle the matter under our Internal Dispute Resolution (IDR) procedures and provide an IDR response within 30 calendar days, unless the complaint is complex or requires additional time. If additional time is required, we will contact you and provide a date by which you can reasonably expect a response.

If unresolved, you may contact:

Australian Financial Complaints Authority (AFCA)

GPO Box 3, Melbourne VIC 3001

Phone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

You may also contact the **Office of the Australian Information Commissioner (OAIC)**:

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

9. Updates

We may update this policy periodically. The current version is always available at:

www.ageingwithgraceadvisory.com.au or by calling 1300 000 165.

Government Identifiers

We may collect government-related identifiers such as Medicare numbers, Centrelink Customer Reference Numbers (CRNs), passport numbers or driver licence details where required to verify identity or provide aged care or financial advice services.

We do not use government identifiers as our own internal client identifiers, except where permitted by law.

Contact Us

Ageing with Grace Advisory Pty Ltd

PO Box 4079, Auburn South LPO VIC 3122

Support: support@awgadvisory.com.au

Phone: 1300 000 165

This Privacy Policy was last revised on 6 February 2026