

SEPTENNIAL GROUP:

One team. Multiple specialists. One shared goal.

Our purpose is to provide truly holistic advice that helps you build, protect and grow your wealth, and reach your goals. We've intentionally brought together specialists across a range of disciplines so that you can benefit from collaborative expertise.

OUR PROMISE TO YOU

You should never have to work out which specialist you need next - that's our job. As your trusted advisers, we'll coordinate the right expertise at the right time, ensuring your strategy remains connected as your personal, business and financial circumstances evolve.

While our specialists work collaboratively as one team, each professional service is delivered through the appropriate legal entity with clear engagement terms, scope and responsibilities, giving you both a seamless experience and complete clarity.

UNDERSTANDING YOUR ENGAGEMENTS

One of the benefits of our integrated approach is that you'll have access to a range of specialist expertise as your needs evolve. However, it is important to understand that each specialist area operates through its own legal entity to meet its professional, licensing and regulatory obligations.

For that reason, each specialist service has its own engagement letter (or Terms of Engagement) that clearly sets out:

- the services being provided;
- the agreed scope of work and duration;
- the professionals responsible for delivering those services;
- the applicable fees and terms; and
- each party's responsibilities.

This ensures there is complete clarity about who is acting for you and the services you are receiving.

WHAT THIS MEANS FOR YOU

As your needs change, you may engage one or more specialist teams within our Group. You will only receive professional advice and services from the specialist teams that you have formally engaged. If you have not entered into a formal engagement with a particular specialist team, that team is not engaged to provide professional advice or services to you at that time.

While our specialists collaborate and share information (where authorised) to deliver a seamless client experience, each team is responsible only for the services described in its own engagement letter and agreed scope of work. This approach provides certainty for everyone by ensuring your advisers, responsibilities and the services being delivered are always clearly defined.

On the next page is a detailed outline of all the entities you may engage with while working with us, and which services they are authorised to provide advice for:



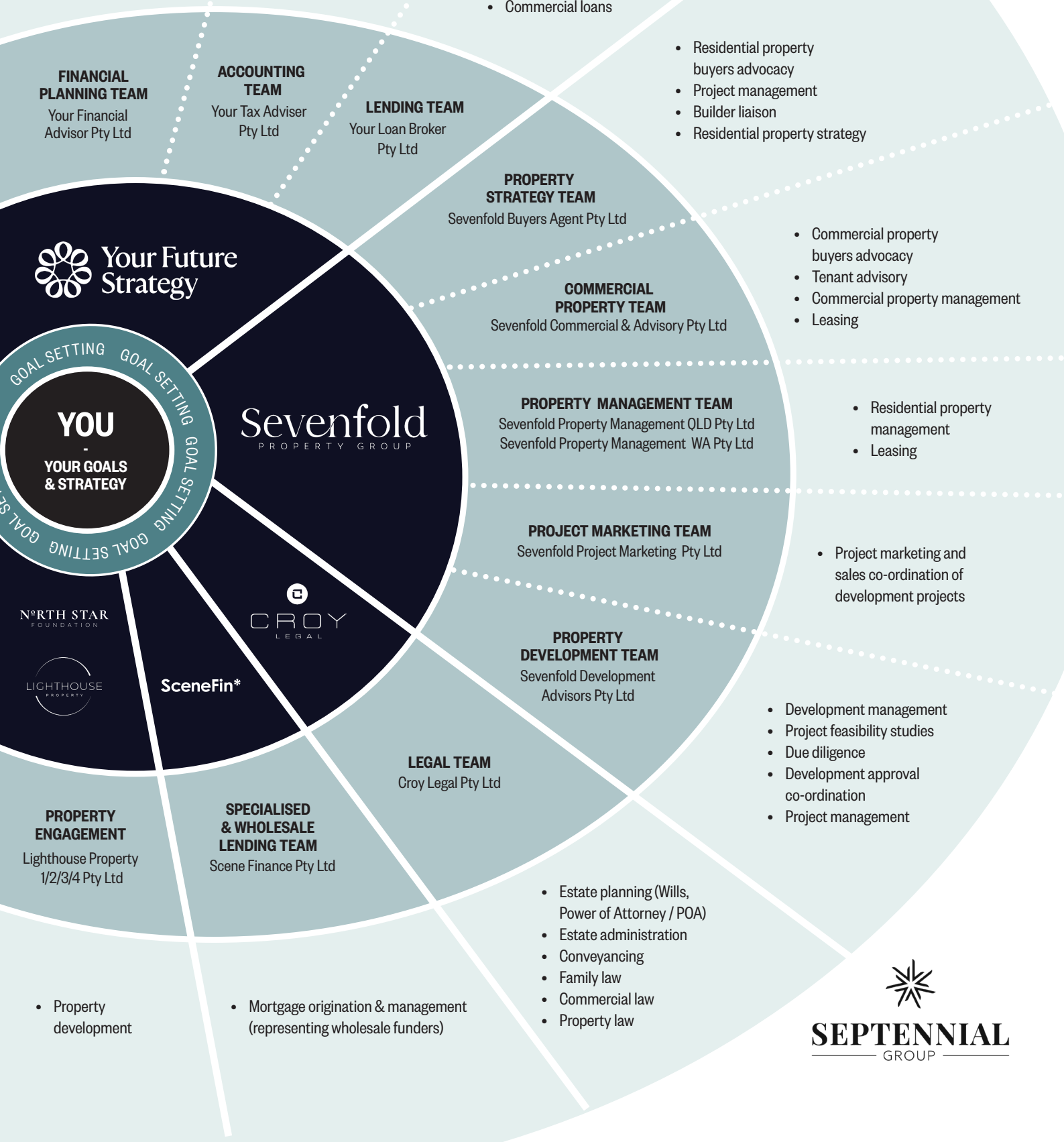
- Financial planning advice
- Personal insurance (life, TPD, IP, trauma)
- Superannuation & SMSF strategy
- Investment advice (shares, ETFs, managed funds)
- Cashflow planning
- Debt management
- Retirement planning & drawdown strategies
- Portfolio construction & asset allocation.

- Tax planning
- Tax compliance
- Bookkeeping
- SMSF accounting & admin services
- ASIC compliance
- Business advisory

- Mortgage broking
- Asset finance
- Development funding
- SMSF loans
- Commercial loans

HOW WE WORK TOGETHER

- You & Your Goals
- Collaborative Goal Setting
- Septennial Group Brands
- Specialist Teams & Entities
- The Services They Deliver



SEPTENNIAL
GROUP

SEPTENNIAL GROUP PRIVACY POLICY

INTRODUCTION

This Privacy Policy outlines how members of the Septennial Group collect, use, disclose and manage personal information in accordance with the Privacy Act 1988 (Cth), the Australian Privacy Principles (“APP”) and other applicable privacy laws and regulations.

The Septennial Group operates a number of related businesses providing financial, lending, accounting, property and structuring services under brands including Your Future Strategy, Sevenfold Property Group and Scene Finance.

While these businesses work collaboratively to provide integrated services, each entity is a separate legal entity and may have different legal and regulatory obligations in relation to your personal information.

WHAT IS PERSONAL INFORMATION?

“Personal Information” means any information or opinion about an identified individual who is reasonably identifiable, this includes information or an opinion that personally identifies you either directly (for example your name) or indirectly.

Personal information may include: your name, signature, address, phone number, date of birth, sensitive information, credit information, employee record information, photographs, internet protocol (IP) addresses, voice print and facial recognition biometrics and location information from a mobile device.

ENTITIES COVERED BY THIS POLICY

This Policy applies to the following entities within the Septennial Group -

Financial Services Entities

- Your Future Strategy Pty Ltd
- Your Tax Advisor Pty Ltd (Accounting & Taxation)
- Your Loan Broker Pty Ltd (Credit & Lending Services)
- Your Financial Advisor Pty Ltd (Financial Planning & Advice)
- Scene Finance Pty Ltd (Lending and Finance Services)

Property Services Entities

- Sevenfold Property Management (QLD) Pty Ltd
- Sevenfold Property Management (WA) Pty Ltd
- Sevenfold Buyers Agents Pty Ltd
- Sevenfold Development Advisors Pty Ltd
- Sevenfold Commercial & Advisory Pty Ltd
- Sevenfold Project Marketing Pty Ltd



Investment and Structuring Entities

- Lighthouse Property No. 1 Pty Ltd
- Lighthouse Property No. 2 Pty Ltd
- Lighthouse Property No. 3 Pty Ltd
- Lighthouse Property No. 4 Pty Ltd
- North Star Foundation Limited

(collectively the “**Septennial Group**”)

These entities may be used in connection with specific client transactions, property acquisitions or structuring arrangements.

EXCLUSION

This Policy does not apply to Croy Legal Pty Ltd, which operates independently and is subject to separate privacy and confidentiality obligations.

WHAT PERSONAL INFORMATION WE COLLECT

We collect personal information that is reasonably necessary to provide our services, including:

- Contact information (name, mailing and/or street address, email address, phone number)
- Identification information (passport, driver licence, date of birth, country of birth and any other information required for identity verification)
- Beneficial ownership information, source of funds information, and source of wealth information where required by law.
- Financial information (including income, assets and liabilities)
- Superannuation and insurance information
- Credit and lending information (bank statements, credit cards)
- Taxation and accounting information (including tax file numbers)
- Business and entity information – ABN’s, Trust deeds etc
- Other sensitive information where required and permitted by law

If you choose not to provide us with your personal information, we may not be able to provide you with our services or otherwise interact with you.

HOW WE COLLECT PERSONAL INFORMATION

We collect your personal information in a variety of ways, including -

- Directly from you through meetings, forms, emails and phone calls
- Through our systems, websites and client portals
- Attending an event
- Subscribing to our mailing list
- From third parties or publicly available sources, including –
 - lenders and financial institutions
 - accountants, advisers and brokers
 - property service providers
 - government agencies and registries

Where reasonable and practicable, we will collect personal information directly from you.

WHY WE COLLECT PERSONAL INFORMATION

We collect, hold and use personal information for purposes including:

- Providing financial, lending, accounting and property services
- Facilitating transactions and structuring arrangements
- Assessing applications and providing advice
- Managing client relationships
- Conducting customer due diligence, identity verification and ongoing monitoring to comply with anti-money laundering and counter-terrorism financing laws
- Complying with legal and regulatory obligations

HOW WE USE YOUR PERSONAL INFORMATION

We use your personal information to:

- Deliver services requested by you
- Communicate with you about your circumstances and opportunities
- Coordinate services across relevant entities (where permitted)
- Maintain internal records and systems
- Meet obligations under financial services, credit and taxation laws

SHARING PERSONAL INFORMATION WITHIN THE SEPTENNIAL GROUP

Given the integrated nature of our services, you may engage with more than one entity within the Septennial Group.

However, **Personal information is not automatically shared between entities.**

We will only share your personal information where -

- you have provided **express consent**, and/or
- sharing is reasonably necessary to provide a service you have requested and is permitted by law

Where information is shared -

- it will be limited to what is reasonably necessary
- it will be used only for the purpose for which it was shared

IMPORTANT ACKNOWLEDGEMENT

While we aim to provide a coordinated and seamless service experience, **Information held by one entity may not be known to another unless it has been shared in accordance with this Policy and your consent.**

DISCLOSURE TO THIRD PARTIES

We may disclose your personal information to third parties where required or appropriate, including:

- lenders, financiers and credit providers
- legal and professional advisers
- property service providers

- AUSTRAC, law enforcement agencies, regulatory authorities and government bodies where required or authorised by law
- service providers who assist in operating our business (IT providers, marketing providers), professional service providers)

We take reasonable steps to ensure that third parties handle your information in accordance with applicable privacy laws.

OVERSEAS DISCLOSURE AND CLOUD SERVICE PROVIDERS

We may use third-party technology platforms, cloud storage providers and software applications to operate our business and deliver services to clients.

As a result, personal information may be stored, processed or accessed by service providers located outside Australia. These locations may include countries in which our technology and service providers operate data centres or support services.

We take reasonable steps to ensure that any overseas recipients handle personal information in a manner consistent with Australian privacy laws and our obligations under the Privacy Act 1988 (Cth).

LEGAL AND REGULATORY OBLIGATIONS

Certain entities within the Septennial Group are subject to financial services, credit and other regulatory obligations.

We may be required to disclose information:

- to comply with applicable laws
- in connection with financial products or credit applications
- to meet professional and regulatory standards

ANTI-MONEY LAUNDERING AND COUNTER-TERRORISM FINANCING OBLIGATIONS

Certain entities within the Septennial Group are subject to obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and related laws.

To comply with these obligations, we may collect, verify, use and retain personal information relating to your identity, beneficial ownership, source of funds, source of wealth, business activities and other information reasonably required to undertake customer due diligence and ongoing monitoring.

This information may be obtained directly from you or from reliable and independent sources including government registries, financial institutions, professional advisers, electronic verification providers and other third parties as permitted by law.

We may disclose personal information to AUSTRAC, law enforcement agencies, regulators and other government authorities where required or authorised by law.

In some circumstances, anti-money laundering and counter-terrorism financing laws may restrict our ability to inform you that information has been disclosed to, requested by, or reported to a government authority.

We will collect, use, retain and disclose personal information for AML/CTF purposes only as permitted or required by law.

CONFLICTS OF INTEREST

Due to the nature of our services. Conflicts of interest may arise from time to time.

Where a conflict arises, we may be required to -

- limit the services we provide, or
- cease acting for one or more parties;

in accordance with our legal and professional obligations.

CROY LEGAL

Croy Legal operates independently and is subject to strict confidentiality and legal professional obligations.

Personal information will not be shared with or from Croy Legal unless you provide **express consent** or where required by law. Any legal services provided by Croy Legal are governed by its own Privacy Policy.

DATA SECURITY

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure.

These steps may include:

- secure IT systems and access controls
- staff training and confidentiality obligations
- physical and electronic security measures

ACCESS AND CORRECTION

You may request access to, or correction of, the personal information we hold about you. Requests should be made in writing using the contact details below. We will respond within a reasonable timeframe.

RETENTION OF PERSONAL INFORMATION

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations.

COMPLAINTS

If you have a complaint about how your personal information has been handled, you may contact us using the details below.

We will investigate your complaint and respond within a reasonable timeframe.



If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC) or, where applicable, AFCA.

Contact Details

Megan Selbie
Privacy Officer
Septennial Group
mselbie@septennial.com.au
1300 987 678

UPDATES

We may update this Privacy Policy from time to time. The most current version will be made available on our website.