Client Personal Information Collection Notice

Licensee: CommonCents Advice Group | AFSL: 524454 | Business Entity: CommonCents Financial Planning | Version: 1st August 2026

WHY WE COLLECT YOUR INFORMATION

We collect your personal information to fulfil our obligations as a licensed financial services provider under the *Corporations Act 2001*, the *Privacy Act 1988*, and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act).

This includes our obligations to:

- **verify your identity** before providing financial services (AML/CTF customer due diligence)
- **provide you with financial advice** tailored to your personal circumstances, goals and financial situation
- **manage your ongoing financial services** including portfolio reviews, insurance and superannuation
- prepare and deliver **Statements of Advice (SOAs)** and ongoing advice documents
- meet **record-keeping obligations** under the Corporations Act, AML/CTF Act and ASIC regulatory requirements
- make reports required by **AUSTRAC** under the AML/CTF Act
- manage complaints and disputes in accordance with our **internal dispute resolution** obligations

WHAT PERSONAL INFORMATION WE COLLECT

For financial advice and services:

- full name, date of birth, contact details and residential address
- financial position: assets, liabilities, income, expenses and cash flow
- superannuation and insurance details
- investment objectives, risk tolerance and time horizon
- health and medical information (for insurance advice), estate planning details and family circumstances
- tax file number, tax residency and relevant tax information
- employment, business activities and source of wealth

For identity verification (CDD):

- identity document details — type, number, issuing authority and expiry
- politically exposed person (PEP) status and sanctions screening results

HOW WE COLLECT YOUR INFORMATION

We collect your personal information:

- directly from you — through our client agreement, fact find, risk profile questionnaire and ongoing correspondence
- from **third-party sources** — including financial institutions, superannuation funds, insurers, ATO, public registers (ASIC) and identity verification services, where reasonably necessary

WHO WE SHARE YOUR INFORMATION WITH

We may disclose your personal information to:

- **product issuers and platforms** — where you invest in a financial product through us, with your consent
- **paraplanning service providers** — who assist in preparing your financial advice documents on our behalf
- **compliance and audit service providers** — who conduct file reviews and compliance monitoring of our advice processes
- **software providers** — such as IT, document management and CRM platform providers — who host and manage our client records and systems
- **your professional advisers** — including your legal, accounting, lending and audit advisers
- **our AML/CTF reporting group**
- **regulators** — including ASIC, AFCA and AUSTRAC, where required by law

OVERSEAS DISCLOSURE

Some of our service providers store data overseas, including in the USA. We take reasonable steps to ensure overseas recipients handle your information consistently with the Australian Privacy Principles (APPs). By engaging our services, you consent to the disclosure of your personal information to overseas recipients as described in this notice.

Note: We remain accountable for how overseas recipients handle your personal information.

USE OF ARTIFICIAL INTELLIGENCE

We may use AI-assisted tools to assist in preparing file notes, portfolio valuations and your financial advice documents, including Statements of Advice and related documents.

Where AI tools are used, your personal information — including your financial position, goals and personal circumstances — may be processed by the AI system. We take reasonable steps to ensure:

- AI tools used by us are subject to appropriate data handling and confidentiality obligations
- your personal information is not used to train AI models without your consent
- human review is applied to all AI-assisted advice outputs before they are provided to you

The AI tools we currently use include: Microsoft CoPilot, fireflies.ai. These may be hosted by providers located overseas.

COMPLIANCE AND ADVICE FILE AUDITS

As part of our quality assurance and compliance obligations, your advice file which includes your personal information may be reviewed by:

- our **internal compliance team**
- **external compliance consultants** engaged by our licensee to conduct advice file reviews and audits
- **ASIC** or other regulators, in the exercise of their supervisory powers

These reviews are conducted for the purpose of ensuring the quality and compliance of the financial advice provided to you. Reviewers are subject to confidentiality obligations.

YOUR PRIVACY RIGHTS

You have the right to:

- **access** the personal information we hold about you
- **correct** information that is inaccurate or out of date
- **request erasure** of information (subject to our legal retention obligations)
- **object** to certain uses of your information

Our Privacy Policy explains how we handle personal information and how to make a complaint.

Client acknowledgement and consent

By working with CommonCents Advice Group, you confirm you have read and understood this Privacy Collection Notice. You consent to the collection, use and disclosure of your personal information as described, including: (a) disclosure to the third-party service providers listed above; (b) use of AI-assisted tools to assist in preparing advice documents; (c) review of your advice file by compliance and audit service providers; and (d) disclosure to overseas recipients as described. You understand you may withdraw consent for uses not required by law by contacting the Privacy Officer above.