

Privacy and Confidentiality Policy

Policy Date: 12th May 2025

Effective Date: 30th June 2025

Most Recent Review: 30th June 2025

Policy Statement and Purpose

Protecting the privacy and confidentiality of personal and sensitive information is of utmost importance to BW Advisers. This policy outlines our commitment to safeguarding the privacy and confidentiality of information collected, processed, and stored by our organisation.

Scope

This policy applies to all employees, contractors, suppliers, and other individuals who have access to personal or sensitive information collected or managed by BW Advisers. It encompasses all aspects of our operations, including data collection, processing, storage, and disposal, and extends to our interactions with customers, clients, partners, and other stakeholders.

Responsibilities

Management

Management is responsible for establishing a culture of privacy and confidentiality within the organisation and ensuring compliance with relevant privacy laws and regulations. They must designate a privacy officer or team responsible for overseeing privacy-related matters and ensuring that appropriate policies, procedures, and safeguards are in place.

Management should provide resources and support to employees to facilitate compliance with this policy and promote awareness of privacy and confidentiality obligations.

Employees

All employees are responsible for understanding and complying with this policy and relevant privacy laws and regulations. They must handle personal and sensitive information with care and only access or disclose such information for legitimate business purposes and with proper authorisation.

Employees should report any suspected or actual breaches of privacy and confidentiality to management or the designated privacy officer promptly.

Policy Principles

Data and Collection Use

BW Advisers will only collect personal and sensitive information that is necessary for the legitimate purposes of our business operations. We will obtain consent from individuals before collecting their personal information, and we will only use or disclose it for the purposes for which it is collected, unless otherwise authorised by law.

Data Security

We will implement appropriate technical and organisational measures to protect personal and sensitive information from unauthorised access, disclosure, alteration, or destruction. This includes encryption, access controls, firewalls, and regular security audits and assessments.

Data Retention

We will retain personal and sensitive information only for as long as necessary to fulfill the purposes for which it was collected or as required by law. When no longer needed, information will be securely disposed of in accordance with our data retention and disposal procedures.

Data Sharing and Transfers

We will only share personal and sensitive information with third parties when legally able and when necessary for legitimate business purposes, with appropriate safeguards in place to protect privacy and confidentiality.

Transparency and Accountability

We will maintain transparency in our data processing activities and provide individuals with clear and concise information about how their personal information is collected, used, and shared. We will also maintain records of our data processing activities and regularly review and assess our privacy practices to ensure compliance with this policy and relevant laws and regulations.

Individual Rights

Individuals have the right to access, correct, or request deletion of their personal information held by BW Advisers. They also have the right to withdraw consent for the processing of their personal information, subject to legal and contractual requirements. Requests to exercise these rights should be submitted to the designated privacy officer or team.

Compliance and Enforcement

Non-compliance with this policy may result in disciplinary action, up to and including termination of employment or legal consequences, depending on the severity of the violation. Employees who have concerns or questions about privacy and confidentiality should contact their manager or a designated privacy officer for guidance or support.

Review and Updates

This policy will be reviewed annually to ensure its effectiveness and compliance with Australian legislative requirements and international standards. Updates may be made necessary to reflect changes in laws, regulations, or best practices to privacy and confidentiality.

Any revisions will be communicated to all employees and stakeholders.

It is the responsibility of our Practice Manager to keep all procedures for this policy up to date.