Privacy Policy

Effective Date: 2 November 2026

This Privacy Policy sets out how Tenex Wealth Pty Ltd collects, uses, discloses, stores and protects your personal information in accordance with the Australian Privacy Principles (APPs) under the *Privacy Act 1988* (Cth), the *Corporations Act 2001* (Cth) and applicable ASIC regulatory guidance.

1. Who We Are

Tenex Wealth Pty Ltd (ABN 32 674 328 619, ACN 674 328 619) is a Corporate Authorised Representative (CAR number 1310645) of Insight Investment Partners Pty Ltd (AFSL 368175). We provide personal financial product advice and related services to clients across Australia, with a primary focus on business owners, professionals, pre-retirees and retirees in the Newcastle and broader New South Wales region.

Our principal place of business is 11 Regent Street, Tingira Heights NSW 2290. Authorised Representative: Kerrod Holland (AR 1304451). Website: www.tenexwealth.com.au. Phone: 0432 368 900. Email: kerrod@tenexwealth.com.au.

As a Corporate Authorised Representative of an Australian Financial Services Licence holder, we are bound by the Corporations Act, the Australian Financial Services Licence conditions of our licensee, and the privacy obligations that apply to financial services providers.

2. What is Personal Information and Why Do We Collect It?

Personal Information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information is true or not and whether it is recorded in a material form or not.

The types of Personal Information we typically collect include, but are not limited to:

- Identity information: full name, date of birth, gender, residential and postal addresses, contact telephone numbers and email addresses.
- Financial information: income, assets, liabilities, superannuation balances and contributions, investment holdings, insurance policies, tax file numbers (TFNs), bank account details and cashflow details.
- Investment and risk profile information: investment experience, objectives, timeframes, risk tolerance and product preferences.
- Family and estate information: dependants, beneficiaries, wills, powers of attorney and SMSF membership details.
- Sensitive information (collected only with consent or as required by law): health information relevant to personal insurance applications and underwriting.
- Website and device information: IP address, browser type, pages visited, cookies and analytics data (see section 11).
- Any other information reasonably necessary to provide, implement or review our financial advice and related services.

We collect Personal Information primarily to provide tailored financial product advice, prepare Statements of Advice and Records of Advice, implement recommendations, provide ongoing service, comply with our legal and regulatory obligations (including under the Corporations Act, Tax Agent Services Act, Anti-Money Laundering and Counter-Terrorism Financing Act, and Superannuation Industry (Supervision) Act), and to improve the quality of our services.

We may also use Personal Information for secondary purposes that are closely related to the primary purpose and that you would reasonably expect, or with your consent. You may opt out of marketing communications at any time by contacting us.

3. How We Collect Personal Information

We collect Personal Information through:

- Face-to-face and video meetings (including Microsoft Teams), telephone calls and emails.
- Our website, online forms, fact-find questionnaires and electronic signature platforms.
- Third-party product providers, platforms and administrators (including BT Panorama, Netwealth, Macquarie, Stake, insurance underwriters and SMSF administrators).
- Accountants, solicitors, referral partners and other professional advisers (with your authority).
- Publicly available sources and government registers where relevant.
- Cookies, analytics and similar technologies when you visit our website.

Where it is reasonable and practicable to do so, we collect Personal Information directly from you. Where we receive information from a third party, we take reasonable steps to ensure you are aware of the collection.

4. Sensitive Information

Sensitive Information includes information or opinions about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union or professional membership, criminal record, or health information.

We will only collect Sensitive Information with your express consent, or where required or authorised by law (for example, health information for personal insurance applications). Sensitive Information is used only for the primary purpose for which it was collected, a directly related secondary purpose, with your consent, or as required or authorised by law.

5. Disclosure of Personal Information

We may disclose your Personal Information to:

- Financial institutions, product issuers, platforms, trustees, insurers and underwriters necessary to implement advice.
- Our licensee, Insight Investment Partners, for supervision, audit and compliance purposes.
- External auditors, compliance consultants and professional advisers.
- IT and cloud service providers, paraplanning and administrative support providers (including overseas recipients – see section 7).
- Regulatory bodies including ASIC, AUSTRAC, the ATO and the OAIC.
- Third parties where you have consented, or where disclosure is required or authorised by law (including court orders or subpoenas).
- Professional indemnity insurers in the event of a claim.

6. Use of Artificial Intelligence and Automated Tools

We use artificial intelligence (AI) and automated technologies to enhance the efficiency, accuracy and consistency of our services. These tools may process Personal Information for the following purposes:

- Assisting with compliance reviews and file quality checks against licensee policies and regulatory requirements.
- Supporting research, strategy analysis and document drafting (always subject to human review by an authorised representative).
- Analysing financial data, risk profiles and investment preferences to support the preparation of personal advice.
- Improving internal processes, training and service delivery.

Important safeguards: All personal financial advice is provided by a human authorised representative. AI tools do not make final advice decisions, do not replace the Statement of Advice process, and do not operate without human oversight. We do not use solely automated decision-making that produces legal or similarly significant

effects on individuals without human involvement.

We implement technical and organisational measures to protect Personal Information processed by AI systems, including access controls, encryption where appropriate, and contractual obligations on service providers. Where practicable, we prefer tools that process data in Australia or under adequate cross-border protections. You have the right to be informed about the use of AI, to access and correct your information, and to raise concerns with our Privacy Officer.

7. Sending Information Overseas

We may disclose Personal Information to overseas recipients located in India and the Philippines for administrative, paraplanning and support services that assist us in delivering services efficiently. We may also use cloud service providers whose servers are located in Australia, the United States, Singapore or other jurisdictions.

We take reasonable steps to ensure overseas recipients handle Personal Information in accordance with the Australian Privacy Principles, including through contractual arrangements. By providing your Personal Information you consent to these disclosures. Please note that if an overseas recipient breaches the APPs, we may not be accountable under the Privacy Act in certain circumstances, and you may not have recourse under the Act against that recipient.

8. Security of Personal Information

We are committed to protecting Personal Information from misuse, interference, loss, unauthorised access, modification or disclosure. Measures include:

- Secure servers, encrypted storage and transmission of data.
- Firewalls, multi-factor authentication and endpoint protection.
- Restricted access on a need-to-know basis and regular staff privacy and cybersecurity training.
- Vendor due diligence and contractual security requirements.
- Regular review of security controls and incident response procedures.

9. Retention and Destruction

We retain Personal Information only for as long as it is reasonably necessary for the purposes for which it was collected, or as required by law. Under the Corporations Act and ASIC guidance, we are required to retain advice-related records (including Statements of Advice, fact finds and client files) for a minimum of seven (7) years after the professional relationship ends. Certain SMSF and tax records may be retained for longer periods.

When Personal Information is no longer required, we take reasonable steps to destroy or permanently de-identify it in a secure manner.

10. Access, Correction and Quality of Personal Information

You have the right to request access to the Personal Information we hold about you and to request correction if it is inaccurate, incomplete, out of date or misleading. To make a request, please contact us in writing. We will respond within a reasonable period (generally within 30 days). We may require identification before releasing information and may charge a reasonable administrative fee for providing copies.

It is important that the information we hold is accurate and current. Please notify us promptly of any changes so we can continue to provide quality advice and services.

11. Cookies, Analytics and Website

Our website may use cookies, pixels and similar technologies to improve functionality, remember preferences, analyse traffic and measure the effectiveness of communications. We may use third-party analytics providers

(such as Google Analytics). You can control cookies through your browser settings; disabling cookies may affect website functionality.

Our website may contain links to third-party websites. We are not responsible for the privacy practices of those sites and encourage you to review their privacy policies.

12. Notifiable Data Breaches

We have processes in place to detect, assess and respond to data breaches. If we become aware of an eligible data breach under the Notifiable Data Breaches scheme that is likely to result in serious harm, we will notify the Office of the Australian Information Commissioner and affected individuals as required by law.

13. Your Rights

Under the Australian Privacy Principles you have the right to:

- Be informed about the collection and use of your Personal Information.
- Access and correct your Personal Information.
- Anonymity or pseudonymity where lawful and practicable.
- Object to certain processing, including direct marketing.
- Make a complaint about our handling of your Personal Information.

14. Privacy Complaints and Enquiries

If you have any questions, concerns or complaints about this Privacy Policy or how we handle your Personal Information, please contact our Privacy Officer in the first instance:

Privacy Officer
Tenex Wealth Pty Ltd
11 Regent Street, Tingira Heights NSW 2290
Email: kerrod@tenexwealth.com.au
Phone: 0432 368 900

We will acknowledge your complaint within five (5) business days and aim to resolve it promptly. If you are not satisfied with our response, you may escalate the matter to our licensee (Insight Investment Partners) or to the Office of the Australian Information Commissioner (www.oaic.gov.au). Complaints about the financial advice itself may also be referred to the Australian Financial Complaints Authority (AFCA).

15. Policy Updates

This Privacy Policy may be updated from time to time to reflect changes in our practices, technology or legal requirements. The current version will always be available on our website. We will notify you of material changes by posting an updated version on our website and, where appropriate, by direct email.

16. Compliance with Other Laws

Our handling of Personal Information also complies with obligations under the *Corporations Act 2001* (Cth), ASIC regulatory guides (including RG 175 and RG 244), the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), the *Tax Agent Services Act 2009* (Cth) where relevant, and the *Spam Act 2003* (Cth).

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This document is general information about our privacy practices and does not constitute personal financial advice.
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