



STRONGHOLD  
ADVICE

# PRIVACY POLICY VERSION 2.0 | 5 MARCH 2025

SMARTMOVE ADVICE PTY LTD  
AFSL: 550 455  
ABN: 23 667 350 370  
ACN: 667 350 370  
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BUNDALL QLD 4217  
INFO@SMARTMOVEADVICE.COM.AU

STRONGHOLD ADVICE PTY LTD  
CAR: 1313382  
ABN: 26 682 377 573  
ACN: 682 377 573  
GROUND FLOOR 470 ST KILDA ROAD  
MELBOURNE VIC 3004  
ADMIN@STRONGHOLDADVICE.COM.AU

Stronghold Advice Pty Ltd is authorised to provide financial services on behalf of SmartMove Advice Pty Ltd the holder of Australian Financial Services Licence Number 550455

SmartMove Advice Pty Ltd (SmartMove)  
AFSL: 550 455  
ACN: 667 350 370  
ABN: 23 667 350 370

## Our Commitment to Privacy

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SmartMove Advice Pty Ltd (SmartMove) recognizes that it is important for you to know how we deal with your personal information and for that reason this statement outlines our current Privacy Policy. SmartMove abides by the National Privacy Principles (NPPs) established under the Privacy Amendment (Private Sector) Act 2001 (website link: <https://www.oaic.gov.au/privacy/australian-privacy-principles>).

## Collection of Information

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SmartMove is required under various legislation and codes of practice to collect certain information about you to provide our range of services. These include, but are not limited to, the Corporations Act, Income Tax Assessment Act as well as certain regulations issued by the Australian Securities and Investments Commission (ASIC). In addition, our ability to provide you with comprehensive and quality services is reliant on us obtaining certain personal information about you. The staff and representatives of SmartMove may request personal and sensitive information from you, which will generally comprise of, but not be limited to, the following type of information:

- Personal details e.g. name, address, contact details (phone, email), date of birth, marital status, dependents, employment details, medical history
- Financial details e.g., assets, liabilities, income, expenses.
- Business details including ABNs.
- Details of all investments, superannuation, investor numbers, credit cards and bank account details.
- Personal goals and objectives.
- Taxation information including your tax file number.

If you do not provide us with your current and most accurate information, we may elect to terminate our relationship with you, if we believe it will jeopardise our ability to provide you with a complete, accurate and comprehensive service. We will not collect any personal information about you except when you have knowingly provided that specific information to us or authorised a third party to provide/disclose that information to us. Information will be collected from a variety of sources including directly from you, external organisations and associated companies of SmartMove. We only collect, maintain, and use personal and sensitive information about you if it is necessary for us to adequately provide the services requested.

# Use and Disclosure of Information

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Any personal information about you collected by SmartMove will be used for the following purposes:

- Provision of financial advice, implementation of financial advice & investment services.
- Completion of associated documentation and application forms.
- To market services which may be supplied by SmartMove or by other suppliers that may be of interest to you unless you inform us not to do so.
- To provide you with agreed services and assisting in meeting your requirements, needs, goals and objectives.

We may be required to share your personal information with the following entities to provide financial services, comply with regulatory requirements, and manage our business operations effectively. These entities include, but are not limited to:

- Other companies within our group – Including related entities, subsidiaries, referral partners, or parent companies for administrative, compliance, and reporting purposes.
- Other Corporate Authorised Representatives (CARs) under our AFSL – Where necessary, we may share information with other CARs for regulatory compliance, internal referrals, and service continuity. In some cases, employees working under one CAR may also have access to client information of another CAR under the same AFSL for compliance, administration, technology support, or regulatory reporting purposes. Any such access will be strictly controlled and in accordance with confidentiality and privacy obligations.
- Regulatory bodies and government agencies – Such as the Australian Securities and Investments Commission (ASIC), Australian Prudential Regulation Authority (APRA), Australian Taxation Office (ATO), Office of the Australian Information Commissioner (OAIC), and the Australian Financial Complaints Authority (AFCA).
- Product providers and investment platforms – Including superannuation funds, investment managers, insurers, and financial institutions that facilitate transactions and manage financial products.
- Third-party service providers – Including IT and cloud storage providers, compliance consultants, auditors, legal advisers, and data analytics firms who support our business operations.
- Financial market infrastructure and clearing entities – If applicable, this includes the Australian Securities Exchange (ASX), Cboe Australia, and associated clearing and settlement facilities.
- External dispute resolution schemes and professional associations – Such as AFCA, the Financial Advice Association of Australia (FAAA), CPA Australia, and Chartered Accountants Australia and New Zealand (CA ANZ).
- Other financial advisers and licensees – If you request a transfer to another adviser or AFSL holder, we may share relevant information to ensure continuity of service.
- Credit reporting agencies – If we provide credit-related services, we may be required to share information with credit reporting bodies such as Equifax or Illion.
- Insurance providers and claims assessors – If you apply for risk insurance or make an insurance claim, we may disclose necessary information to underwriters and claims processors.

We take all reasonable steps to ensure that any entity receiving your information complies with applicable privacy laws and confidentiality obligations.

Furthermore, we will not use or disclose information collected about you other than for a purpose made known to you unless the disclosure is:

- Required by law (e.g., ATO, Australian Prudential Regulation Authority (APRA) and ASIC have the power to order us to disclose information about your situation).
- Is authorised by law (e.g., to protect our interests or where we have a duty to the public to disclose); or
- You have consented to our disclosing the information to you.

SmartMove undertakes not to sell, rent, or trade your personal information. We may use the personal information collected from you for the purpose of providing you with direct marketing material such as articles that may be of interest to you, however you may request not to receive such information by contacting our office/Administration department.

Stronghold Advice Pty Ltd T/A Stronghold Advice (ABN: 26 682 377 573) is a Corporate Authorised Representative (CARN 1313382) of SmartMove Advice Pty Ltd (AFSL 550455).

Stronghold Advice Pty Ltd abides by the Policies & Procedures of the Licensee (SmartMove Advice Pty Ltd).

## Storage and Security

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SmartMove recognises how important the privacy of your personal information is to you. We will always therefore seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification, or disclosure. Your personal information is generally held in your personal file. Information may also be held in a computer database. All paper files are stored in secure areas. Computer-based information is protected using access passwords. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure on/ off-site storage facility for a period of at least 7 years, to comply with legislative and professional requirements, following which time the information will be destroyed.

## Identifiers

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SmartMove will not adopt as our own any identifiers that you may provide to us such as Tax File Numbers, Centrelink reference numbers, Medicare numbers etc.

## Transfer of Information Overseas

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This is required either when information is sent directly to you, the client, or to obtain further information from international organisations to aid in delivering the agreed services. Wherever possible, the information will only be transferred to another country where SmartMove reasonably believes the other country has privacy laws substantially similar to our own or has committed to following our own directives in this way.

## Access to Your Information

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You may at any time request access to your personal information and we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. We may, prior to providing access in accordance with this policy, require you to provide evidence of your identity. In the event we refuse you access to your personal information; we will provide you with an explanation for that refusal. We will endeavour to respond to any request for access within 14 days depending on the complexity of the information requested and/or may charge a one-off fee for the request of a significant amount of information to be copied or accessed.

## Quality of the Personal Information

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SmartMove is committed to ensuring that your personal information that we hold is accurate, complete, and up to date. To assist us with this, please contact us if any of your personal details change. Furthermore, if you believe that the information we have about you is not accurate, complete or up to date, please contact us and we will take all reasonable steps to correct/update this information.

## Privacy Complaints

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If you wish to complain about any breach or potential breach of this privacy policy or the NPPs, you should contact us, and request that your complaint be directed to the Director as follows:

The Managing Director  
SmartMove Advice Pty Ltd  
2B 95 Ashmore Road, Bundall, QLD 4217, Australia  
Email: [info@smartmoveadvice.com.au](mailto:info@smartmoveadvice.com.au)

Your complaint will be responded to within 14 days. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are also entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.



# Online Privacy

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SmartMove website may contain links to other websites whose operator may or may not adhere to a privacy policy or be governed by the NPPs. We will not collect any information about you from our website except where you knowingly provide it to us. The information collected will depend on how you use the facilities on the website and may include some of the personal details stated above. For example, if you visit a website to browse or download information, our system will record the date and time of your activities, the information viewed and/ or downloaded. In the event that you enter information in the process of completing an email or any other on-line forms, the information will be collected by SmartMove if you submit the details. Our website uses cookies, which allow us to identify your browser while you are using our site. Cookies do not identify you; they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers have a facility to notify you when you receive a cookie, and you can elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences.

## Privacy Statement

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SmartMove Advice Pty Ltd (SmartMove)

SmartMove is committed to complying with the Privacy Act requirements introduced in December 2001 (website link: <https://www.oaic.gov.au/privacy/australian-privacy-principles>). SmartMove may collect information about you for the following purposes:

- Provision of financial advice, implementation of financial advice & investment services.
- Completion of associated documentation and application forms.
- To market services which may be supplied by SmartMove or by other suppliers that may be of interest to you unless you inform us not to do so.
- To provide you with agreed services to assist in meeting your requirements, needs, goals and objectives.

As SmartMove provides several service offerings, we are required under various legislative bodies and codes of practice to collect certain information about you to provide our range of services. These include, but are not limited to, the Corporations Act, Income Tax Assessment Act as well as certain regulations issued by the Australian Securities and Investments Commission (ASIC).

Whilst you are not obliged to provide us with the information requested, if you decline to do so, we may be unable to provide the level of service and advice required and expected of us. In connection with the provision of services, it may be necessary for us to disclose personal information about you to other professionals and organisations such as:

- Financial institutions (including fund managers, Life insurance product providers, financial Advisers, stockbrokers).
- Government departments e.g., Australian Taxation Office, ASIC and Centrelink as required by law.
- External service providers and other compliance inspectors for audit purposes.
- External parties for business acquisitions or in the event of the sale of the business.
- Any other external party as authorised by you from time to time.

We undertake not to use or disclose information collected, for purposes other than those detailed above, or related purposes, unless the law requires the disclose or we have been provided with your consent to do so. SmartMove recognises how important the privacy of your personal information is to you. We will therefore, always, seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification, or disclosure. SmartMove is committed to ensuring that the personal information we hold is accurate, complete, and up to date. If you believe that the personal information, we hold about you is incorrect, we request that you contact us, and we will take all reasonable steps to correct this information. If at any time you wish to have access to your personal information, we hold about you, (or if you would like a copy of our detailed Privacy Policy) you are welcome to request this by contacting the Director and/or Responsible Manager by email on [info@smartmoveadvice.com.au](mailto:info@smartmoveadvice.com.au).

The preparation of this Privacy Policy was completed on 5<sup>th</sup> March 2025.