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Picture Wealth Group Privacy Policy

Scope and Application of this Policy

Effective as of 17th June 2026

This Privacy Policy applies to all personal information collected, held, used, and disclosed by Picture Wealth Holdings Limited and its controlled entities (collectively, "Picture Wealth Group", "we", "us", or "our"). The policy is designed to ensure compliance with the Australian Privacy Principles under the Privacy Act 1988 (Cth) and to provide maximum clarity regarding its application.

For the avoidance of doubt, this policy applies to all categories of individuals whose personal information may be collected, used, or disclosed by the Picture Wealth Group in connection with our products, services, platforms, or business operations. This includes, but is not limited to, the following categories:

- **Clients:** Individuals who receive, have received, or may receive financial advice, lending, insurance, or other services from any entity within the Picture Wealth Group.
- **Customers:** Individuals who engage with our products or services, including those who use our digital platforms (such as the Welfie app or website), whether or not they receive financial advice.
- **Users:** Individuals who access, register for, or interact with any of our digital platforms, tools, or applications, including prospective users and those who have not yet become clients or customers.
- **Clients of Licensee Firms:** Individuals who are clients of authorised representatives, corporate authorised representatives, or other firms licensed by or affiliated with the Picture Wealth Group, including those operating under separate Australian Financial Services Licences (AFSLs) but whose data may be shared with or processed by the Picture Wealth Group.
- **Corporate Clients and Employees:** Corporate entities that engage Picture Wealth Group for services (such as employer-sponsored financial wellbeing programmes), and their employees or representatives whose information is provided to us in connection with those services.
- **Potential Clients and Prospective Users:** Individuals who enquire about, express interest in, or are referred to our services, including those who participate in marketing campaigns, events, or promotions.
- **Business Partners and Referrers:** Individuals and entities with whom we have a business relationship, including professional advisers, referrers, and introducers.
- **Other Individuals:** Any other person whose personal information is collected in the course of our business, including job applicants, contractors, and visitors to our premises or websites.

This policy also applies to personal information collected, used, or disclosed by any entity listed in the "Entities Covered by this Policy" section below, and to all personal information handled in connection with our business activities, whether collected directly from the individual, from third parties, or via digital means.

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Entities Covered by this Policy

This policy applies to the following entities within the Picture Wealth Group, including but not limited to:

- Picture Wealth Holdings Limited
- Picture Wealth Pty Ltd
- Picture Wealth Technologies Pty Ltd
- Picture Wealth Advisory Pty Ltd (PWA)
- Advocate Private Wealth Pty Ltd
- Picture Wealth Finance Pty Ltd
- Picture Wealth Services Pty Ltd
- NEO Financial Solutions Pty Ltd
- NEO Brokers Pty Ltd
- Insight Investment Services Pty Ltd
- Futuro Financial Services Pty Ltd
- PW Innovations Pty Ltd
- Capstone Financial Planning Pty Ltd
- Capback Licensee Solutions Pty Ltd

Interpretation

References in this policy to "you" or "your" include all individuals falling within the categories listed above, regardless of the nature of their relationship with the Picture Wealth Group. Where the context requires, references to "clients", "customers", "users", "corporate clients", "licensee firm clients", and other categories are to be interpreted as inclusive of all individuals whose personal information is handled by the Picture Wealth Group.

This policy answers the following questions about privacy at Picture Wealth Group:

1. Why do we need your personal information?.
    i. Will my personal information be used for direct marketing?
    ii. What happens if I do not provide information that has been requested?
2. What types of personal information do we collect?
    i. How do we collect personal information?
    ii. Can you remain anonymous or use a pseudonym when dealing with us?
3. How do we protect your personal information?
    i. Who do we share personal information with?
    ii. Do we send personal information to overseas recipients?
    iii. How do we update your personal information?
4. How can you contact us about privacy?
    i. How do you find out about your personal information we hold?
    ii. How can you make a complaint about privacy?
    iii. How can you escalate unresolved privacy complaints?

5. What about privacy and the internet?
    i. What are interactive tools and how do we use them?
    ii. What are cookies and how do we use them?
    iii. Links to third party websites
    iv. Website analytics
6. About this policy

1. Why do we need your personal information?

Protecting your personal information is important to us. We only collect information that is reasonably necessary for us to provide our products and services. We also recognise that some information is particularly sensitive, and we are committed to being transparent about why we collect it, how we use it, and the safeguards we apply.

For the purposes of this policy, personal information means information or an opinion that identifies you, or could reasonably be used to identify you.

We use and disclose personal information only for the primary purpose for which it was collected, or for a related secondary purpose where permitted by law.

Where we use automated decision-making processes that could significantly affect your rights or interests (for example, in digital onboarding or product recommendations), we will provide clear information about the logic involved, the significance and potential consequences of such decisions, and your rights in relation to those processes, in accordance with applicable law.

We collect, hold, use and disclose personal information primarily to establish, manage and administer our products and services, and to comply with our legal and regulatory obligations.

We may also use and disclose your personal information for related secondary purposes, including:

- responding to enquiries or complaints;
- arranging for services to be provided by third parties;
- improving our products and customer service (see 'Will my personal information be used for direct marketing?');
- internal business purposes such as record-keeping, analytics, auditing and training,

and otherwise, only where you would reasonably expect such use or disclosure, you have given specific and informed consent, or where use or disclosure is required or authorised by law.

i. Will my personal information be used for direct marketing?

We may use personal information to keep you informed about products and services that may be of interest, in compliance with applicable laws and regulations. Individuals may opt out of receiving marketing communications at any time by following the instructions in our communications or by contacting us (see the section 'How can you contact us about privacy?).

ii. What happens if I do not provide information that has been requested?

You have the right to choose whether to provide your personal information. However, if you decline, we may be unable to fulfil your request for a specific service or verify your identity to protect you from fraud. If you are seeking financial advice, a lack of information may also impact our ability to properly analyse your personal circumstances.

2. What types of personal information do we collect?

We may ask for a range of personal information, limited to what we need, to assist us in providing you with relevant financial products and services. The information we request could include (but is not limited to):

- Your name, date of birth, TFN and contact details.
- Health information, domicile and citizenship status.
- Information regarding dependents and family commitments.
- Bank account, debit card and credit card details where required solely for billing and payment purposes.
- Your occupation, employment history, employment circumstances, details of family commitments and social security eligibility.
- Your financial needs and objectives.
- Your assets and liabilities (current and future), income and expenses.
- Your superannuation and insurance details.
- Your investment preferences, attitude or tolerance to investment and financial risk.

For sensitive information, we require express, informed consent, separate from general acceptance of this policy. Sensitive information is a special category of personal information under the Privacy Act 1988 (Cth). It includes information or an opinion about an individual's racial or ethnic origin, political opinions, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or practices, criminal record, health information, genetic or biometric information (such as fingerprints or facial recognition data), and certain other categories. Because of its nature, sensitive information is subject to greater protections and we will only collect it with your express, informed consent, unless otherwise permitted by law. We obtain consent through digital forms, onboarding documents, explicit checkboxes, and written or recorded verbal consent.

We take reasonable steps to protect payment information and, where practicable, do not store debit or credit card details. Where payment information is retained, it is held securely in accordance with our information security policies and applicable legal requirements.

i. How do we collect personal information?

Most of the personal information we collect comes directly from you. This may be provided through application forms or other documents (in writing or digitally), or during interactions with us such as phone calls and interviews.

In some circumstances, we may also collect personal information from external sources, including:

- a parent or guardian (in relation to children);
- persons authorised by you, such as your lawyer or accountant;
- other credit providers;
- publicly available sources, such as directories;
- market research organisations (through surveys or polls);
- third-party intermediaries, such as mortgage brokers;
- credit reporting bodies;
- government agencies, including the Australian Taxation Office; and
- fund managers, superannuation funds, life insurers and other product issuers.

We will only collect personal information from these external sources where it is impracticable to collect it directly from you, or where we are permitted by law to do so.

ii. Can you remain anonymous or use a pseudonym when dealing with us?

If you wish to remain anonymous or use a pseudonym when dealing with us, we may be able to provide you with limited information or services. In many instances, however, it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym, which may lead to the termination of our arrangement with you. Importantly, providing inaccurate or incomplete information may result in you obtaining products or services that are not appropriate for your needs, potentially leading to financial detriment or loss.

3. How do we protect your personal information?

We take steps to ensure that your personal information is stored securely, whether it is collected in person or through telephone, mail, internet or other interactions with us. Personal information may be held in secure computer systems, paper files or other formats.

Hard copy files are accessible only to authorised personnel and are stored in secure facilities. Computer-based records are protected by password access and other security controls, with regular data backups held in secure off-site storage.

We implement a range of technical and organisational measures to protect personal information from misuse, loss, unauthorised access, modification or disclosure. These include access controls, encryption, regular security audits, staff training, and incident response planning.

In the unlikely event of a data breach, we have procedures in place to contain and manage the incident, including notifying affected individuals and, where required, relevant privacy regulators.

We follow documented data retention and destruction policies to ensure that personal information is securely destroyed or permanently de-identified when it is no longer required for the purposes for which it was collected, unless retention is required by law.

If you cease to be a client, we will retain your personal information for at least seven years to comply with legal and professional obligations. After this period, the information will be securely destroyed.

i. Who do we share personal information with?

From time to time, we may need to share your personal information with entities within the Picture Wealth Group, as well as with external parties. The specific entities we share your personal information with depend on the product or service involved, but could include:

- areas, business units, and entities within the Picture Wealth Group that provide financial and other services, for reasonable business purposes;
- financial advisers, brokers and other parties authorised or accredited by Picture Wealth Group;
- service providers and specialist advisers we engage to provide us with services such as administrative, audit, financial, insurance, research, IT, technology, cloud storage, or cybersecurity services, some of whom may contact you on our behalf;
- insurers, including reinsurance companies, and credit providers;
- courts, tribunals and other dispute resolution bodies in the course of a dispute;
- credit reporting or reference agencies;
- employers contributing to or otherwise participating in our superannuation plans;
- policy committees in our superannuation plans;
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other financial services providers that we may need to deal with on your behalf;
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for Picture Wealth Group, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service); and
- other financial services institutions – in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

ii. Do we send personal information to overseas recipients?

Some of the entities that we share information with may be located in, or have operations in, other countries. This means that your information may be stored or accessed in overseas countries, including but not limited to, the United States, Taiwan, Philippines, India, Malaysia, Trinidad, Tobago, Singapore, Finland, Belgium and Ireland.

Before disclosing personal information overseas, we take reasonable steps to ensure that the recipient will handle your information in a manner consistent with the APPs. In some cases, we may seek your express consent to such disclosure, and will inform you of any risks involved if the overseas recipient is not subject to similar privacy obligations.

iii. How do we update your personal information?

We will update your personal information if you contact us. We also take reasonable steps to ensure that the personal information we collect, use and disclose is accurate, up-to-date, and complete. We may update your personal information if we believe it is incomplete or out of date by gathering data from other sources such as public records and other organisations.

We also provide you with means to review and update your information, for example through a client portal.

4. How can you contact us about privacy?

You can call us on (08) 6243 0013, send an email to pwacompliance@picturewealth.com or write to us at Picture Wealth Group, PO Box 7857, Cloisters Square, WA, 6850, to:

- seek more information about anything contained in this policy, or to request a printed copy of this policy;
- update or correct your personal information;
- opt out of receiving direct marketing material;
- ask about accessing or correcting the personal information we hold about you; or;
- make a privacy related complaint.

i. How do you find out about your personal information we hold?

You can access the personal and credit information that we hold about you by calling, emailing or writing to us (see how you can contact us about privacy). We'll do our best to respond to your request within 30 days of receipt; if it's going to take longer, we'll get in touch to let you know why and ask for more time.

There are some situations where we are allowed to refuse or limit your access to information, for Picture Wealth Group when the information is commercially sensitive. If that happens, we'll write to you and let you know why.

There is no charge for making a request to access your personal information. However, in some cases, we may charge a reasonable fee to cover our costs in locating, compiling, and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

ii. How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed at the start of this section.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. We'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter. We aim to resolve all privacy complaints within 30 days. If we are unable to do so, we will keep you informed of the progress and the reasons for any delay.

iii. How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed, or that it is taking too long to resolve, you can escalate your concerns by contacting:

The Privacy Officer
Picture Wealth Group
PO Box 7857, Cloisters Square, WA, 6850
Email: pwacompliance@picturewealth.com

Alternatively you can contact an external body:

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner-call 1300 363 992 or find them online at oaic.gov.au.
- If your complaint is about the products and services we provide you can contact the Australian Financial Complaints Authority- call 1800 931 678, in writing to Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001 or email **info@afca.org.au.** There may be a time limit for referring your complaint to AFCA. You should contact them or visit their website for more details.

5. What about privacy and the internet?

This statement is specific to the Picture Wealth Group website and mobile device applications, including the Welfie platform.

i. What are interactive tools and how do we use them?

Our websites and mobile device applications provide you with many interactive tools designed to help you make an informed choice with certain financial and other decisions. Some of these tools include budget planners, debt reduction calculators, home loan comparison, key factsheets and superannuation calculators.

We may collect personal information you enter when using the interactive tools on our website or through our applications.

ii. What are cookies and how do we use them?

Cookies are small pieces of text stored on your computer, tablet or mobile device to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website.

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You can manage your cookie preferences through your browser settings, and may opt out of certain analytics tracking where available.

You may not be able to access some parts of our websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

iii. Links to third party websites

Our websites have links to external third party websites that may benefit the user.

External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to Picture Wealth Group's privacy standards and procedures.

iv. Website analytics

Website analytics measurement software is used to assist in tracking traffic patterns to and from our websites, anonymously surveying users of the sites. The system is used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website.

This non-personal information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites.

About this policy

This policy is effective as of 28th May 2026. We are committed to ongoing compliance with the Privacy Act 1988 (Cth), including all amendments and reforms. We regularly review and update our privacy practices to reflect changes in law, technology, and industry standards. We will update this policy when our information handling practices change. Any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website, and we encourage you to check our website periodically to view our current policy or contact us for a printed copy. Where we make material changes to this policy, we will take reasonable steps to notify affected individuals, for example by email or prominent notice on our website.