

Privacy Policy

Rawlings Featherstone Financial Solutions

Version 1.0 | April 2026

1. About This Policy

Rawlings Featherstone Financial Solutions (RFFS) is committed to protecting your personal information and handling it in a responsible, transparent manner in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and the Australian Privacy Principles (APPs).

This policy explains how we collect, use, store, disclose and protect your personal information, and how you can access or correct it. It applies to all clients, prospective clients and other individuals whose personal information we hold.

RFFS operates as:

- Norden Total Financial Services Pty Ltd ATF Norden Total Financial Solutions Unit Trust (ABN 19 881 043 132), trading as Rawlings Featherstone Financial Solutions
- An Authorised Representative of Consultum Financial Advisers Pty Ltd (ABN 65 006 373 995, AFSL 230323)
- A member of Rhombus Advisory Pty Ltd (ABN 43 672 201 517)

This policy is made available to you free of charge. If you would like a copy in a different format, please contact us using the details in Section 12.

2. What Is Personal Information?

Personal information is any information or opinion about an identified individual, or an individual who is reasonably identifiable, regardless of whether the information is true and whether it is recorded in a material form. Common examples include your name, address, date of birth, phone number, email address, employment details and financial information.

Sensitive information is a subset of personal information that includes health or medical information, and information about your racial or ethnic origin, religious beliefs, political opinions, sexual orientation, trade union membership, or criminal record. Sensitive information receives a higher level of protection under the Privacy Act.

Health information is a subset of sensitive information and includes information about your physical or mental health, any disability, treatment you have received or intend to receive, and any expressed wishes about future health services.

3. What Personal Information We Collect

We collect only the personal information that is reasonably necessary to provide you with financial advice and related services. This may include:

- Your full name, date of birth, address, contact details and identification information
- Financial information including income, assets, liabilities, superannuation, investments and insurance
- Employment details and Centrelink or government benefit information

- Tax File Number (TFN), where required for a specific service such as opening a superannuation account or lodging a Centrelink application
- Health and medical information, where relevant to insurance or aged care advice
- Information about your family circumstances, goals and financial objectives
- Information about your investment preferences, risk tolerance and financial literacy

We will always tell you why we are collecting your information. Where it is not practicable to collect information directly from you, we may collect it from third parties such as product providers, Centrelink, the Australian Taxation Office or other financial institutions — in which case we will notify you promptly.

We will not collect your TFN unless it is necessary for the service being provided, and we will obtain your prior consent. Your TFN will be stored only in the designated TFN field in our practice management software and will be redacted from all documents uploaded to your client record.

4. Sensitive Information and Health Information

We only collect sensitive information, including health information, where it is necessary to provide a financial service you have requested — for example, where we are providing advice on personal insurance or aged care. We will always obtain your express consent before collecting sensitive information.

Sensitive information will only be used or disclosed for the specific purpose for which it was collected. We will retain only the minimum amount of health or sensitive information required to fulfil our advice obligations. Where we hold health information that is no longer relevant to any ongoing service, we will take steps to destroy or de-identify it.

5. How We Use Your Personal Information

We use your personal information for the primary purpose of providing you with financial advice and related financial services. This includes:

- Preparing and delivering Statements of Advice, Records of Advice and other advice documentation
- Conducting annual reviews and ongoing portfolio monitoring
- Lodging applications with product providers, platforms and government agencies on your behalf
- Communicating with you about your financial affairs
- Meeting our legal and regulatory obligations under the Corporations Act 2001 (Cth), the National Consumer Credit Protection Act 2009 (Cth) and other applicable legislation
- Maintaining accurate and complete client records

We may also use your personal information for related secondary purposes that you would reasonably expect, such as conducting compliance and quality assurance reviews of our advice. We will not use your personal information for direct marketing without your separate consent.

We will not use or disclose your personal information for any purpose other than those described in this policy, unless you provide your consent or we are required or authorised to do so by law.

6. Disclosure of Your Personal Information

We may disclose your personal information to third parties where necessary to deliver our services, including:

- Product providers, investment platforms and superannuation funds
- The Australian Taxation Office, Centrelink and other government agencies, where you have authorised us to do so
- Our licensee, Consultum Financial Advisers Pty Ltd, and our professional standards body, Rhombus Advisory Pty Ltd, for compliance, supervision and quality assurance purposes
- External auditors or compliance reviewers engaged by our licensee
- Legal or regulatory bodies where we are required by law to disclose

We will only disclose your personal information to a third party for a purpose unrelated to the primary purpose of collection — such as sharing information with a referral partner — if you have provided your written consent.

We will not disclose your personal information to your spouse, partner or legal personal representative without your prior consent, unless we are authorised to do so by law.

7. Overseas Disclosure

RFFS does not engage offshore service providers or disclose your personal information to overseas recipients as part of our standard service delivery.

We use Microsoft 365 services, including Microsoft Copilot, for internal business purposes. These services are provided under Microsoft's enterprise terms, which require data to be stored in Australian data centres for Australian business customers. Where client information is processed through these tools, it remains subject to Australian privacy protections and is not accessible by overseas third parties.

We use Xplan as our primary practice management platform. Xplan is operated by IOOF/Insignia Financial, and any applicable overseas data handling obligations are governed by the data processing agreements between Consultum/Rhombus and IOOF/Insignia Financial. We do not separately disclose client data to any overseas entity.

If our arrangements change in the future and we engage service providers with overseas operations, we will update this policy and notify you accordingly.

8. Tax File Numbers

We handle your Tax File Number (TFN) strictly in accordance with the Privacy (Tax File Number) Rule 2015. We will only request your TFN when it is necessary for a specific purpose under taxation, superannuation or personal assistance law, and only with your prior consent.

Your TFN is stored exclusively in the designated TFN field in our practice management software. It is redacted from all documents — whether physical or electronic — before those documents are uploaded to your client record. Access to your TFN is restricted to authorised staff who require it to perform a specific task.

When your client relationship with us ends, or when your TFN is no longer required for any ongoing legal purpose, it will be removed from our systems.

9. Security of Your Personal Information

We take the security of your personal information seriously and take active, reasonable steps to protect it from misuse, interference, loss, and unauthorised access, modification or disclosure. Our security measures include:

- Restricting access to personal information to authorised staff who have been trained on their privacy obligations
- Using password-protected systems with automatic lockout after periods of inactivity
- Storing electronic records in a secure, access-controlled environment
- Ensuring physical documents are not left unattended in areas accessible by the public
- Maintaining reliable data backup and recovery procedures
- Regularly reviewing our internal policies and procedures for handling personal information

In the event of an actual or suspected data breach, we will immediately notify our licensee (Rhombus Advisory / Consultum Financial Advisers) and take steps to contain and assess the breach. If the breach is assessed as an eligible data breach under the Notifiable Data Breaches scheme, the Office of the Australian Information Commissioner (OAIC) will be notified within the required timeframe. We will not notify any regulator, affected individual or third party regarding a breach without prior written consent from our licensee.

10. Quality and Accuracy of Your Information

We take reasonable steps to ensure that the personal information we hold is accurate, up to date, complete and relevant. We do this by:

- Confirming your details at each client engagement and annual review
- Prompting you to advise us of any changes to your personal circumstances
- Correcting records promptly when errors or changes are identified
- Verifying personal information with you before it is used or disclosed to third parties, particularly if there has been a lengthy period since it was last confirmed

We will verify your identity before making any changes to your personal details on file.

11. Accessing and Correcting Your Personal Information

You have the right to request access to the personal information we hold about you, and to request that we correct any information that is inaccurate, out of date, incomplete or misleading.

To make a request, please contact us using the details in Section 12. We will respond within 30 calendar days of receiving your request. There is no charge for making a request, however we may charge a reasonable fee to cover the cost of providing access where this is appropriate.

In limited circumstances, we may be unable to provide access to certain information — for example, if doing so would reveal personal information about another individual, if the information relates to legal proceedings, or if access would be unlawful. If we decline your request, we will provide written notice explaining our reasons and advising you of the complaint mechanisms available.

If you believe that a request for access or correction is being made by someone other than yourself, please be aware that we are required to verify the identity of the requestor before releasing any information.

12. Contact Us

For any privacy-related enquiries, requests for access or correction, or complaints, please contact:

Rawlings Featherstone Financial Solutions

Principal Adviser: Norman Dennis

Suite 2/2 Blamey Place, Mornington VIC 3931

Phone: 03 5975 8333

Email: admin@rffs.com.au

13.Complaints

If you have a concern about the way we have handled your personal information, we encourage you to contact us in the first instance using the details above. We will acknowledge your complaint within 5 business days and aim to resolve it within 30 calendar days.

If you are not satisfied with our response, you may lodge a complaint with the Office of the Australian Information Commissioner (OAIC):

Office of the Australian Information Commissioner

Website: www.oaic.gov.au

Phone: 1300 363 992

GPO Box 5218, Sydney NSW 2001

You may also contact the Australian Financial Complaints Authority (AFCA) if your privacy complaint relates to the provision of financial services:

Australian Financial Complaints Authority (AFCA)

Website: www.afca.org.au

Phone: 1800 931 678

14.Updates to This Policy

We will review and update this policy from time to time to reflect changes in our services, our obligations or the law. The current version will always be available on request. Where a material change has been made, we will take reasonable steps to notify clients who may be affected.

Compliance notice

This policy has been prepared in accordance with the Rhombus Advisory Privacy Standard and the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth). All client-facing distribution of this document requires approval from the Principal Adviser. RFFS operates as an Authorised Representative of Consultum Financial Advisers Pty Ltd (ABN 65 006 373 995, AFSL 230323). AR Number available on request.