

# Financial Services Guide

## Important Information

The financial services we refer to in this guide are offered on behalf of GWM Adviser Services Limited and its representatives, collectively referred to as “us, we or our”.

This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- the services and types of products we’re able to offer you;
- how we and our associates are paid and any other benefits we may receive;
- any potential conflicts of interest we may have;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it’s full of useful information – and is also worth holding on to for future reference. The Privacy Notification on page 4 is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us (please refer to the ‘Contact details’ section at the end of this FSG for details).

## What else will you receive?

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail. In certain circumstances it is not a requirement that you be given a PDS (including, for example, where you already have one).

## Who is responsible for the financial services we provide?

GWM Adviser Services Limited is an Australian Financial Services Licensee and is responsible for the financial services provided including the distribution of this FSG.

GWM Adviser Services Limited  
ABN 96 002 071 749  
Australian Financial Services Licensee number 230692  
Level 1, 105-153 Miller Street, North Sydney NSW 2060

## How can you provide us with instructions?

You can give us instructions by using the contact details set out in this FSG. Generally, you need to give us instructions in writing (e.g. fax, e-mail or letter) or another method as agreed by us.

## Not Independent

GWM Adviser Services is part of the National Australia Bank Limited (“NAB”) group of companies (“NAB Group”). As the NAB Group is an issuer of financial products, some of which are included in our Approved Product List (APL), we are not able to refer to ourselves or our advice as ‘independent’, ‘impartial’ or ‘unbiased’.

## Are we connected with any financial product issuers?

GWM Adviser Services Limited is part of the National Australia Bank Limited (“NAB”) group of companies (“NAB Group”). GWM Adviser Services Limited is a wholly owned subsidiary within the NAB Group. As the NAB Group is an issuer of financial products, we are not able to refer to ourselves or our advice as ‘independent’, ‘impartial’ or ‘unbiased’. If you would like further information about independence, conflicts or selecting a financial adviser you can visit ASIC’s Money Smart website ([www.moneysmart.gov.au/investing/financial-advice](http://www.moneysmart.gov.au/investing/financial-advice)).

We are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by GWM Adviser Services Limited or its representatives.

We may provide general advice on financial products issued by companies within the NAB Group or companies in which a shareholding is maintained by a NAB Group member (including MLC Limited). These include products and services issued or operated by the following entities:

- National Australia Bank Limited ABN 12 004 044 937 AFSL and Australian Credit Licence 230686 (branding includes ‘NAB’ and ‘National’)
- MLC Limited ABN 90 000 000 402 AFSL 230694
- MLC Investments Limited ABN 30 022 641 661 AFSL 230705 (branding includes ‘Private Investment Consulting’)
- JANA Investment Advisers Pty Ltd ABN 97 006 717 568 AFSL 230693
- JB Were Limited ABN 68 137 978 360 AFSL 341162
- NULIS Nominees (Australia) Limited ABN 80 008 515 633 AFSL 236465 as trustee for the MLC Super Fund ABN 70 732 426 024, and as trustee for the MLC Superannuation Fund ABN 40 022 701 955 (branding includes ‘MLC’ and ‘Plum’)
- Navigator Australia Limited ABN 45 006 302 987 AFSL 236466 (branding includes ‘Pre Select Funds’)
- WealthHub Securities Limited ABN 83 089 718 249 AFSL 230704
- Antares Capital Partners Ltd ABN 85 066 081 114 AFSL 234483 (this includes as the issuer of the ‘Altrinsic Global Equities Trust’ co-branded ‘Altrinsic Global Advisers’ and ‘a partner of MLC Asset Management’)

They also include products that are managed by the following NAB Group investment managers:

- Fairview Equity Partners Pty Ltd ABN 45 131 426 938 AFSL 329052
- Intermede Investment Partners Limited
- MLC Asset Management Services Limited
- Presima Inc

Please refer to the PDS and/or Offer documents for further information. An investment in products provided by a NAB Group company (other than NAB) is not a deposit or liability of, and is not guaranteed by, NAB.

NAB and its related bodies corporate distribute insurance products issued by MLC Limited ABN 90 000 000 402. MLC Limited is part of the Nippon Life Insurance Group and not a part of the NAB Group.

We provide general advice on products that are listed on our approved products list. Before any products are added to our approved list, a review process is undertaken, and products are required to meet minimum standards.

If you acquire a product or service issued by a NAB Group company, they will benefit by receiving product and management fees from you. Please refer to the relevant PDS and/or offer documents for further information.

## **What kinds of financial services can we provide you?**

Our Representatives who act as Relationship Managers and Super Consultants, and who have provided this FSG to you, are authorised by GWM Adviser Services Limited to provide general financial product advice and deal in Superannuation and Life Products – Life Risk Insurance including the following financial products, which are part of the MLC Super Fund:

- Plum Super including insurance policies available through Plum Super;
- MLC MasterKey Business Super (including MLC MasterKey Personal Super), including insurance policies available through MLC MasterKey Business Super; and
- MLC MasterKey Pension Fundamentals.

The Trustee of the MLC Super Fund is NULIS Nominees (Australia) Limited, a member of the NAB Group.

If you require personal advice (which considers your objectives, financial situation and needs) rather than general advice we may refer you to an alternative source of advice.

Where we refer you to an associate of ours for advice (for example, if we refer you to an adviser authorised by a NAB Group licensee to receive personal financial product advice) they may charge you fees for their services. They are required to disclose and have your consent to those fees before they proceed to provide any personal financial advice to you.

## Privacy Notification

This **Privacy Notification** tells you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy, please ask us.

If you would like more information about our Licensee GWM Adviser Services Limited (and other members of the NAB Group), please also refer to the National Australia Bank Privacy Policy available at [www.nab.com.au/privacy](http://www.nab.com.au/privacy)

### Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties. We do this only if it's necessary to do so, for example where:

- we can't get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us;
- at your request, we exchange information with your legal or financial advisers or other representatives.

You may not be aware that we have collected personal information about you. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

### What happens if you don't provide your information to us?

If you don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- verify your identity or protect against fraud; or
- let you know about other products or services that might meet your financial and lifestyle needs.

### Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your personal information, is kept securely.

## Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which we use your information. This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisers, paraplanners and organisations who work with us, including GWM Adviser Services Limited and other members of the NAB Group, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee GWM Adviser Services Limited and other members of the NAB Group;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities)
- where you have given your consent.

We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers). You can view a list of the countries in which those overseas organisations are located at [www.nab.com.au/privacy/overseas-countries-list/](http://www.nab.com.au/privacy/overseas-countries-list/)

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## Sharing with MLC Limited

NAB distributes MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information with MLC Limited so as to ensure:

- your insurance premiums are correctly calculated;
- insurance claims and benefits are paid;
- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products);

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to NAB's privacy policy as well as NAB Group's security procedures and controls.

### **Consent to marketing activity**

We presume you consent to being contacted by us (including GWM Adviser Services Limited and other members of the NAB Group) about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the 'Contact us' section of this FSG). We will process your request as soon as practicable.

### **Gaining access to your personal information**

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

### **Correcting your Information**

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

### **Complaints**

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal these complaints, by reading our Privacy Policy (by contacting us) or by referring to the 'Complaint resolution' section of this FSG.

### **Further information**

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the 'Contact us' section of this FSG.

For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at <https://www.oaic.gov.au/>

## Complaint resolution

Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let our Representative know so we can act on it immediately.
2. If our Representative has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:  
**Phone:** 1800 611 950  
**Email:** [advice.complaints@nab.com.au](mailto:advice.complaints@nab.com.au)  
**In writing to:**  
Advice Dispute Resolution Team  
GWM Adviser Services Limited  
Level 2, 105-153 Miller Street  
North Sydney NSW 2060
3. If your concerns haven't been resolved to your satisfaction, or we haven't responded to you within 45 days, you can lodge a complaint with the Australian Financial Complaints Authority (AFCA):  
**Website:** [afca.org.au](http://afca.org.au)  
**Email:** [info@afca.org.au](mailto:info@afca.org.au)  
**Telephone:** 1800 931 678 (free call)  
**In writing to:** Australian Financial Complaints Authority, GPO Box 3, Melbourne, VIC, 3001

AFCA provides fair and independent financial services complaint resolution that's free to consumers.

Time limits may apply to lodge a complaint with AFCA, so you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

GWM Adviser Services Limited holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our advisers who were authorised by GWM Adviser Services Limited at the time of providing the advice but are no longer representatives of GWM Adviser Services Limited at the time of your complaint.

## **Cost of services provided**

There is no charge for the provision of financial services by our Representatives.

That means we do not charge for the provision of any general advice and we do not accept any investment or insurance related product commissions.

An explanation of the fees and charges of the product provider will be outlined in the relevant PDS.

### **Other Benefits**

Our Representatives who act as Relationship Managers and Super Consultants are salaried employees of the NAB Group and may be eligible to receive regular incentive payments in addition to their salary.

Incentives are based on a balanced approach, including the achievement of both sales and non-financial measures. Sales targets may include products issued by companies who are members of the NAB Group. The incentive that may be payable is up to 80% of the Representative's salary, subject to meeting required compliance and behavioural standards.

### **Non-monetary benefits**

We keep a register detailing certain non-monetary benefits that we receive (e.g. benefits valued between \$100 and \$300, genuine education or training and information technology software or support). You can review this register by contacting us.

Please be aware that GWM Adviser Services Limited may charge you for the cost of providing this information to you.

### **Sponsorship**

GWM Adviser Services Limited receives cash payments from product providers who sponsor and attend training presentations, conferences and/or professional development days. Amounts vary between product providers and your financial adviser does not directly share in the sponsorship payment; however, they may indirectly benefit as these payments subsidise the costs associated with these training and professional development events.



## Contact Details

For more information on anything you have read in this FSG please contact our Representative.

If you require any further advice or services, you can contact NAB Direct advisers at:

Telephone: 1800 062 237

Email: [advice.gateway@nab.com.au](mailto:advice.gateway@nab.com.au)

Address: PO Box 1141, North Sydney NSW 2059