Financial Services Guide



Version: 3

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Important Information

The financial services we refer to in this Financial Services Guide (FSG) are offered by your financial adviser on behalf of GWM Adviser Services Limited trading as MLC Advice (interchangeably referred to in this FSG as GWM Adviser Services and MLC Advice).

This 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 11 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 your financial adviser.

What else you will receive

In addition to this FSG, if we provide you with personal financial product advice we will also present you with a written Statement of Advice (SOA). This will describe:

- any advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we may receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

After that, any time we give you further financial advice, we will either provide you with another SOA or give you (or keep our own) written Record of Advice (ROA). You can request a copy of this by contacting your financial adviser any time up to seven years from the date the advice was provided.

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).

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'.

Other questions you may have

Who's responsible for the financial services you provide?

Our financial advisers are representatives of GWM Adviser Services Limited trading as MLC Advice ABN 96 002 071 749, Australian Financial Services Licence Number 230692 ("GWM Adviser Services") registered office at Level 1, 105-153 Miller Street, North Sydney NSW 2060.

GWM Adviser Services is part of the National Australia Bank Limited ("NAB") group of companies ("NAB Group"). Please note:

- any advice you receive is provided by GWM Adviser Services, not NAB;
- any investment you make as a result of the advice you receive from GWM Adviser Services does not represent a deposit or other liability of NAB, the NAB Group or GWM Adviser Services;
- any investment you make can be subject to investment risk, including possible delays in repayment and loss of income and principal invested;
- neither NAB, the NAB Group nor GWM Adviser Services in any way stand behind the capital value and/or performance of any investment you may make as a result of the advice you receive;
- NAB or a company in which the NAB Group currently has a shareholding may benefit from any advice you receive by receiving product and other fees from you; and
- GWM Adviser Services is not an authorised deposit-taking institution.

Are you connected with any financial product issuers?

GWM Adviser Services is a member of the NAB Group. GWM Adviser Services is a wholly owned subsidiary within the NAB Group. NAB does not guarantee or otherwise accept any liability in respect of the financial advice or services provided by GWM Adviser Services.

As NAB Group companies are issuers 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).

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.

We may recommend 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

If we recommend a product or service issued by a NAB Group company, they will benefit from our recommendation by receiving product and management fees from you as well as fees paid by fund managers to distribute the fund manager's product. Please refer to the relevant PDS and/or offer documents for further information

We generally recommend products that are listed on our approved product list. These will include NAB Group products. Before any products are added to this list a review process is undertaken, and products are required to meet minimum standards. If in reviewing your circumstances, these products are not appropriate for you, then we may recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests. You can view a copy of our approved product list on the MLC website (https://www.mlc.com.au/personal/advice).

GWM Adviser Services and other members of the NAB Group 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.

If appropriate to your requirements, objectives and circumstances then we may recommend an insurance policy issued by MLC Limited.

What kinds of financial services are you able to provide me – and what financial product/s do they relate to?

GWM Adviser Services is licensed to provide financial product advice and deal in the following financial products:

- · Basic Deposit Products;
- Non-basic Deposit Products;
- Non-cash Payment Products;
- · Derivatives;
- General Insurance Products;
- Government Debentures, Stocks or Bonds;
- Investment Life Products Investment Life Insurance Products (including funeral bonds, endowment policies, allocated pensions and annuities);

- Life Products Life Risk Insurance Products (including term life, total and permanent disability, trauma and income protection);
- Managed Investments Schemes, including Investor Directed Portfolio Services (IDPS);
- · Retirement Savings Account Products;
- · Securities;
- · Standard Margin Lending Facilities; and
- Superannuation

Some MLC Advice financial advisers may only be authorised to give personal financial product advice on a limited range of financial products. If a financial adviser is unable to help you, they will let you know and will refer you to another financial adviser of MLC Advice who can.

If we are unable to provide you with a financial service or financial product that you are interested in, we will advise you of this and refer you to an alternative source of advice.

What information do you need from me?

In order to provide appropriate advice which is in your best interests, your financial adviser will need details of your circumstances, needs and objectives, which would typically include details of your current financial situation and other relevant personal information.

You can choose not to tell us, if you do not wish to, however the advice you receive may not be appropriate or we may not be able to provide you with advice.

You should read the warnings contained in the *Statement of Advice* carefully before making any decision relating to a financial product(s).

What information will you keep on file, and can I see it?

We are committed to implementing and promoting a privacy policy, designed to ensure the privacy and security of your personal information. A copy of our Privacy Notification Statement which forms part of this FSG is attached. A copy of our Privacy Policy is available on our website at mlc.com.au or can be obtained by phoning us on 13 22 65.

A record of your personal information, which may include address details and other details required in order to issue a financial product such as health and financial information is maintained including any recommendations made to you.

How should I give you instructions?

You can give us instructions by using the contact details set out in the 'Contact Us' section of this FSG or by contacting your adviser directly. Generally, you need to give us instructions in writing (e.g. fax, e-mail or letter) or another method as agreed by us.

How do I pay for the services provided and how are they calculated and disclosed to me?

You and your financial adviser will discuss and agree an appropriate fee structure. Please refer to the attached 'Our fees and charges' section which forms part of this FSG for further information. There are a number of options available for payment:

- we may invoice you directly for initial advice and Advice On-Track;
- in some circumstances, where possible, you may pay us a service fee that is deducted from your investment as a "one off" payment or in instalments;
- where applicable, we may be paid a commission by the financial product issuer(s) at the time you commence an

- insurance contract and ongoing commission annually during the life of the insurance contract:
- where applicable, we may be paid an ongoing commission by the financial product issuer(s) during the life of the investment if you commenced an investment pre-1 July 2013:
- a combination of the above.

Details of any payment we receive from financial product issuers are contained in the Product Disclosure Statements that we will provide you with when recommending a financial product.

If you receive personal financial advice from us, we will provide you details of any fees, commissions and any other benefits, where possible in actual dollar amounts, in the written advice. We will provide worked dollar examples if actual dollar amounts cannot be provided.

If you do not receive personal financial advice from us, we will provide on request, details of any fees, commissions and any other benefits in relation to any other financial service we provide to you.

Where we receive fees from issuer companies for raising capital or debt on behalf of that company, we will rebate these fees to you.

Do you or my financial adviser receive any further benefits?

Your financial adviser is a salaried employee and may receive a quarterly/annual incentive payment, in addition to their salary. The incentive is awarded based on a balanced scorecard approach, including the achievement of both financial (e.g. client revenue) and non-financial measures (e.g. client experience, risk management, professionalism and culture).

These payments are not an additional cost to you, nor are they deducted from your insurance premiums.

Conferences and Seminars and Non-Monetary benefits

Financial Advisers of MLC Advice may attend conferences or professional development seminars that have a genuine education or training purpose. These may be subsidised in whole or part by MLC Advice. MLC Advice may also pay for the financial adviser's travel and accommodation costs, and events and functions held in conjunction with the conference or seminar.

GWM Adviser Services keeps a register detailing certain non-monetary benefits that the adviser receives (e.g. benefits valued between \$100 and \$300, genuine education or training and information technology software or support). You can view an extract of the register by contacting us. Please be aware that GWM Adviser Services may charge you for the cost of providing this information to you.

Will anyone be paid or receive any benefits for referring me to MLC Advice?

Where you have been referred to us by someone else, we may, in some circumstances, pay them a referral fee, or where legally permitted, a commission or other benefit. This includes a benefit which may arise from an arrangement between National Australia Bank Limited ("NAB") and MLC Wealth Limited (MLCWL), a related body corporate of GWM Adviser Services.

We will disclose this to you within the Statement of Advice where applicable.

By using the financial services provided by GWM Adviser Services, you acknowledge and agree that there may be an arrangement between NAB and MLCWL in respect to referrals, and that a

	benefit may be provided under that arrangement where you have been referred to us.
Sponsorship	GWM Adviser Services 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.
What should I do if I have a complaint?	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.
	 Please let your financial adviser know so we can act on it immediately.
	If your adviser has not satisfactorily resolved your complaint, please contact our Complaints Resolution Manager on:
	Phone: 1800 611 950 Email: advice.complaints@nab.com.au
	In writing: Please address the envelope "Notice of Complaint" and send it to:
	Advice Dispute Resolution Team GWM Adviser Services Level 2, 105-153 Miller Street North Sydney NSW 2060
	 If your complaint isn't resolved within 45 days or to your satisfaction, then you may refer the matter to the Australian Financial Complaints Authority (AFCA):
	Website: www.afca.org.au Email: 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 holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of advisers who were authorised by us at the time of providing the advice, but at the time of the complaint are no longer representatives of ours.
Contact Us	For more information on anything you have read in this FSG, to obtain a copy of our privacy policy, to update your contact details, or if there is anything else we can help you with please contact your adviser directly, or contact MLC Advice by:
	 calling our contact centre on 13 26 52 (Hearing impaired customers can call TTY 13 36 77) Emailing us: feedback@mlc.com.au Via our website: www.mlc.com.au

Who's responsible for the financial services you provide?

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- any investment you make can be subject to investment risk, including possible delays in repayment and loss of income and principal invested;
- neither NAB, the NAB Group nor GWM Adviser Services in any way stand behind the capital value and/or performance of any investment you may make as a result of the advice you receive;
- NAB or a company in which the NAB Group currently has a shareholding may benefit from any advice you receive by receiving product and other fees from you; and
- GWM Adviser Services is not an authorised deposit-taking institution.

Client Acknowledgement

It's important that you're informed of the above information and that we're being transparent about who we are and how we work with NAB. Therefore, we'd appreciate if you could sign below to acknowledge that you have read and understood the information in this document.

Name	On behalf of
Signature	Date
Name	On behalf of
Signature	

Our fees and charges

Type of advice	Fee charged
Initial consultation	At our expense
Advice preparation and implementation fees	The fees charged for the preparation and implementation of advice or specific transactions requested by you will depend on your individual circumstances and our assessment of the complexity of the advice or services provided.
	The minimum initial fee charged for advice preparation and implementation is \$4,600 combined, while the maximum fee that can be charged is generally \$25,000. However, depending on the complexity of the advice you may be charged a higher fee.
	For example, complex Statements of Advice that contain multiple goals with multiple strategies across multiple tax structures, including but not limited to Self-Managed Superannuation Funds, Family Trusts and companies, are likely to be charged closer to \$25,000. Less complex Statements of Advice that address limited goals with strategies across single less complex tax structures are likely to be charged a proportionally lesser fee.
	Any fees above the maximum require General Manager approval and will be explicitly agreed with you prior to preparing the advice. Where there is an existing arrangement in place, the minimum fee for advice preparation and implementation may be lower than that illustrated above.
	The relevant advice preparation and implementation fees will be disclosed to you and agreed with you upfront before we provide advice.
	Advice preparation fees are normally charged on presentation of the Statement of Advice. Where you do not proceed with our recommendations, part or all of the advice preparation fee may still be charged.
	The implementation fee is charged separately on acceptance of all or part of the recommendations in the Statement of Advice.
	Fees may be paid directly by you via credit card, direct debit, cheque or in some circumstances where possible, collected through the investment platform.
Hourly rates	In limited circumstances, an hourly rate may be charged in lieu of the above advice preparation and implementation fees. An hourly rate may also be charged for other services including administrative services. The hourly rate ranges from a minimum of \$165 per hour to a maximum of \$330 per hour. These fees will be agreed with you upfront.

Commission on life insurance products

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Ongoing commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

Date policy is issued	Initial Commission (% of annual policy cost including GST)	Ongoing Commission (% of annual policy cost including GST)
Before 1 January 2018 or before 1 April 2018 (application received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018:
- that policy amendment results in commission receivable by us; and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

Example (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions of up to \$495 (\$1500 x 33%) may be payable.

Please note that the initial and ongoing commissions on life insurance products are paid by product issuers and is not a direct cost to you.

Commission on other products

For existing clients already in an established pre-1 July 2013 commission arrangement, we may receive commission on investment and superannuation products or margin lending products held. The rate of initial up-front commission may be between 0% and 5.5% and ongoing commission may be between 0% and 0.88% of the value of your investments for as long as the product is held.

The frequency that we receive these payments varies (for example, some are received monthly and some are received quarterly). Specific details including the frequency of these payments will be included in the advice documentation provided to you.

Please note – from 1 January 2019 we will no longer accept contribution-based commissions and will not be paid asset-based commissions from superannuation and investment products issued by a NAB Group company.

Advice On-Track fee

You may elect to participate in Advice On-Track so you can contact us when needed and your plan is regularly reviewed.

The Advice On-Track fee is based on the complexity of your situation and advice needs. The minimum fee is \$2,200 p.a. (although a lower fee maybe charged in some circumstances, please refer to your agreement for exact fee amounts). The maximum fee is generally \$25,000 p.a. In instances where a customised program is required to meet more complex financial needs we will explicitly agree the fee with you.

Any commission we receive for life insurance products you may have is in addition to this fee.

You can pay in the following ways:

- By direct invoice from us; or
- In some circumstances, where possible, as a one-off payment or in instalments through the investment platform.

In the event that your financial adviser is unable to offer you Advice On-Track, they will refer you to another financial adviser who can.

Ad hoc advice

Where client circumstances and supporting strategies involve limited complexity there will be an opportunity to request ad hoc review advice. The minimum initial fee charged for the preparation and implementation of this ad hoc review advice is \$1,900 combined.

The fees will be discussed with you at the time the ad hoc review advice is arranged. The fee quoted will be based on an hourly rate. The hourly rate ranges from a minimum of \$165 per hour to a maximum of \$330 per hour.

All fees and commissions are inclusive of GST.

Privacy Notification

Your personal information and privacy

We are grateful for the trust and confidence you have in us to safeguard your privacy. This **Privacy Notification** tells you how GWM Adviser Services trading as MLC Advice collects your information, what we use it for and who we share it with. It also points out some key features of the NAB Group Privacy Policy (which covers all NAB Group companies, including GWM Adviser Services) available at www.nab.com.au/privacy.

By providing personal information to us, you consent to the collection, use and disclosure of your information in accordance with this Privacy Notification and any other arrangements that apply between us.

How we collect information from you

We'll collect your personal information from you directly whenever we can, for example when you fill out a form with us, when you've given us a call or used our websites (including via cookies). (Please see the NAB Groups Cookies Policy www.nab.com.au/cookies for more information). Sometimes we collect your personal information from third parties. You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

How we collect your information from other sources

Sometimes we collect information about you from other sources. We may collect information about you that is publicly available (for example from public registers or social media), or made available by third parties. We generally do this where it's necessary for us to do so, for example where:

- we can't get hold of you and need to update your contact details;
- we need information from third parties such as an insurer about an application you make through us;
- we receive information related to the detection or prevention of fraud or other criminal activity;
- · you have consented to third parties sharing it with us; and
- at your request, we exchange information with your legal or financial advisers or your other representatives.

We may use or disclose information about you in order to combine the information that we hold with information collected from or held by external sources.

When the law authorises or requires us to collect information

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.

How we use your information

We use your information (which may in some cases include your sensitive information, such as health information) to provide you with the financial services you have requested and for other purposes including:

- giving you information about a product or service including financial help, guidance and advice;
- considering whether you are eligible for a product or service, including identifying or verifying you or your authority to act on behalf of a client;

- administering the service(s) we provide you, which includes answering your requests and complaints, varying products and services, conducting market research, and managing our relevant product portfolios;
- telling you about other products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, iM, mail, or any other electronic means including via social networking forums), unless you tell us not to;
- identifying opportunities to improve our service to you and improving our service to you;
- allowing us to run our business and perform administrative and operational tasks (such as training staff, risk management; developing and marketing products and services, undertaking planning, research and statistical analysis; and systems development and testing)
- preventing or investigating any fraud or crime, or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- for any other purpose for which you have given your consent.

You agree that GWM Adviser Services and other members of the NAB Group may contact you from time to time on an ongoing basis about suitable products and services via the contact details you have provided to us unless you unsubscribe or otherwise contact us.

You can let us know at any time if you no longer wish to receive direct marketing offers from the NAB Group by contacting us (see the 'Further Information' section of this Privacy Notification in this FSG). We will process your request as soon as practicable. Where you have subscribed to something specific (like to hear from one of our sponsored organisations) then these subscriptions will be managed separately. If you no longer wish to receive any direct marketing emails from GWM Adviser Services, click the unsubscribe link included in the footer of our emails.

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;
- personalise your experience with us;
- verify your identity or protect against fraud; or
- let you know about other products or services that might meet your financial, e-commerce and lifestyle needs.

Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

Sharing Your Information

We may share your information with other organisations for any purposes for which we use your information.

Sharing with the NAB Group

We may share your personal information with other NAB Group members. This could depend on the product or service you have applied for and the NAB Group member you are dealing with.

Sharing with MLC Limited

We (and other members of the NAB Group) distribute MLC Limited's life insurance products. MLC Limited is no longer part of the NAB Group of companies. NAB Group companies (including GWM Adviser Services) 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 so as to ensure:

- your insurance premium is calculated correctly;
- insurance claims and benefits are paid;
- insurance products are viewable to service customer contact;
- NAB Group companies 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);
- a smooth customer experience when you contact us, including:
 - we can transfer you to the right service centre;
 - where appropriate, NAB and MLC Limited can cooperate in order to handle your complaint;
 - being able to provide assistance should you wish to speak about your MLC Limited products held (for example, where possible, we may assist by updating contact details on request).

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 the NAB Group Privacy Policy as well as the NAB Group's security procedures and controls.

Sharing at your request

We may need to share your personal information with:

- your representative or any person acting on your behalf (for example, financial advisers, lawyers, settlement agents, accountants, executors, administrators, trustees, guardians, brokers or auditors); and
- your referee such as your employer (to confirm details about you).

Sharing with third parties

We may disclose your personal information to third parties outside of the NAB Group for any purposes for which we use your information. We will only disclose your health information or other sensitive information if we first obtain your consent or we are required to do so by law.

We may disclose your personal information 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 other members of the NAB Group, depending on the financial services and products you have requested;
- insurance, investment, superannuation and managed funds organisations, and their advisers and service providers related to the financial services you have requested;

- medical professionals, medical facilities or health authorities who verify any health information you may provide;
- brokers or referrers who refer your business to us;
- organisations involved in debt collecting, including purchasers of debt;
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- organisations we sponsor and loyalty program partners, including organisations the NAB Group has an arrangement with to jointly offer products or has an alliance with to share information for marketing purposes;
- companies we arrange or distribute products for, such as insurance products;
- service providers that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- our joint venture partners that conduct business with us;
- organisations involved in a corporate re-organisation or transfer of all or part of the NAB Group assets or business;
- organisations that assist with our product planning, analytics, research and development;
- mailing houses and telemarketing agencies and media organisations who assist us to communicate with you, including media or social networking sites;
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers (e.g. consultants and any independent customer advocates);
- government or regulatory bodies (including the Australian Securities and Investment Commission and the Australian Tax Office) and other organisations as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities); and
- where you've given your consent or at your request, including to your representatives, or advisors.

Sharing outside of Australia

We run our business in Australia. We may need to share some of your information with organisations outside Australia (for example our 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.

We may 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's 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.

Accessing or correcting your Information	You can ask us to provide you with access to or correct information that we hold about you. We will usually comply with such requests. If we elect to deny your request relying on a legal exception, we will give you our reasons. You can find out how to seek access to or the correction of your information by reading the NAB Group Privacy Policy, available at www.nab.com.au/privacy or by contacting us and asking us for a copy.
Update your information	Please let us know using the details set out in the 'Contact Us' section of this FSG if your address, phone number or other personal information changes, or otherwise let your adviser know. In particular, please let us know if you are relocating to another country as this may impact the services we are able to provide and/or how we provide them.
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 with these complaints, by reading the NAB Privacy Policy, available at www.nab.com.au/privacy or by referring to the 'What should I do if I have a complaint?' section of this FSG.
Further Information	We care about your privacy. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback. You can contact us in relation to any privacy enquiries by:
	 submitting an <u>online Compliments</u>, <u>Suggestions or Complaints form</u> via <u>www.nab.com.au</u>
	 calling our contact centre on 13 22 65 (Hearing impaired customers can call TTY 13 36 77)
	 speaking to us in person.
	For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website www.oaic.gov.au .

Who's responsible for the financial services you provide?

Our financial advisers are representatives of GWM Adviser Services Limited trading as MLC Advice ABN 96 002 071 749, Australian Financial Services Licence Number 230692 ("**GWM Adviser Services**"), registered office at Level 1, 105-153 Miller Street, North Sydney NSW 2060.

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- NAB or a company in which the NAB Group currently has a shareholding may benefit from any advice you receive by receiving product and other fees from you; and
- GWM Adviser Services is not an authorised deposittaking institution.

Client Acknowledgement

It's important that you're informed of the above information and that we're being transparent about who we are and how we work with NAB. Therefore, we'd appreciate if you could sign below to acknowledge that you have read and understood the information in this document.

Name	On behalf of	
Signature	Date	
Name	On behalf of	
Signature	 Date	