

Financial Services Guide Part 1

Version Number 1.0

This Financial Services Guide ('FSG') has been authorised for distribution by the authorising licensee, Ingenious Brokers Pty Ltd ABN 53 656 735 956, AFS Licensee 538868 ('Ingenious Brokers'). Ingenious Brokers is the financial services licensee that authorises your Ingenious Brokers financial adviser ('Adviser') and their firm ('we', 'us', 'our') to provide financial services.

This is an important document designed to provide you with information to make an informed decision about whether to use the financial services that we provide.

This FSG is divided into two parts and both parts must be read in conjunction as together they form the full FSG. Part One of this FSG provides high level disclosure of the financial services provided by us as well as important information about Ingenious Brokers whereas Part Two of this FSG is an Adviser Profile and more specifically outlines the financial services provided and products recommended by us.

Contacting us If you need to contact us, you can contact Ingenious Brokers using the following details:



PO Box 1333, South Melbourne Victoria 3205



1300 599 512

Part One

Part One of this FSG contains information about:

- ▶ Ingenious Brokers, as the holder of the Australian financial services license that authorises us to provide financial services.
- ▶ Lack of Independence disclosure statement.
- ▶ Relationships or associations with other entities, that could create potential conflicts of interest.
- ▶ Other disclosure documents you may receive.
- ▶ The financial services and types of products we provide or recommend.
- ▶ Collecting your personal information and providing us with instructions.
- ▶ Fees or costs that may apply to you.
- ▶ Remuneration that we, your Adviser or a related entity may receive, and
- ▶ What you can do if you are not happy with our services or have a complaint.

Who Is Ingenious Brokers Pty Ltd?

Ingenious Brokers holds an Australian Financial Services Licence No.538868 (AFSL) issued by the Australian Securities and Investment Commission (ASIC). Ingenious Brokers conducts business through its financial advisers who are appointed as Authorised Representatives under Ingenious Brokers AFSL. Where Ingenious Brokers has appointed a corporate entity as an Authorised Representative, employees of that company who give general advice will also be authorised by Ingenious Brokers. Ingenious Brokers is responsible for the general advice and conduct of your Ingenious Brokers financial adviser. We are not responsible for any unauthorised services that they may offer (to the full extent permitted by law), so please check the services your adviser offers in FSG Part Two.

Lack of Independence

Ingenious Brokers Pty Ltd and its Representatives listed in FSG Part 2 are not independent, impartial, or unbiased because we:

- Receive commissions for the advice we provide on life risk insurance products.

Authorised Representative Profile – Part Two

Your financial adviser will be the Authorised Representative listed in Part Two of this FSG.

This FSG must be read in conjunction with the Authorised Representative Profile as it forms part of this FSG. It provides detailed information about your financial adviser such as their contact details, referral sources and the types of financial products and services they are authorised to advise/deal in. Please retain both Part One and Part Two of the FSG for your reference and any future dealings with [insert defined company name] and your financial adviser.

What Other Documents Might You Receive?

You might receive the following documents when your Adviser provides financial services to you:

Target Market Determination (TMD) You will receive a TMD if your Adviser provides you general advice in relation to a financial product or offers to arrange the issue of a financial product on your request. The TMD contains information about a financial product's features, fees, benefits, and risks.

Product Disclosure Statement (PDS) You will receive a PDS if your Adviser provides you a general advice in relation to a financial product or offers to arrange the issue of a financial product on your request. The PDS contains information about a financial product's features, fees, benefits, and risks.

Advice Services We Provide

Our licence can provide general advice only in the following financial products:

- Life Products – Life Risk Insurance Products – General Advice Only.
- Life Products – Investment Life Insurance Products – General Advice Only.

How We Handle Your Personal Information

Ingenious Brokers and we are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality Ingenious Brokers has adopted the principles set out in the Privacy Act 1988. For further details you can refer to Ingenious Brokers Privacy Policy.

How do You Pay for Ingenious Brokers Advice and Services?

All commissions are required to be paid directly to Ingenious Brokers as the licensee. Ingenious Brokers retains a set monthly fee for the services it provides to your adviser, and the balance is passed on to your adviser. If the commissions, or benefits are not calculable at the time we provide general advice, we will describe the manner in which they are calculated at the time the advice is given or as soon as practicable after.

Retail Insurance Product Commissions

Ingenious Brokers may be paid initial and ongoing commissions by retail insurance product issuers where you acquire any of the retail insurance products via our services.

Where the commission in the first year is greater than that payable in later years, the maximum upfront (year 1) commission is 66% and the maximum ongoing (years 2+) commission is 22% (inclusive of GST). For example, for an insurance premium of \$1,000, the commission is up to \$660 upfront and up to \$220 each year thereafter.

Where upfront and ongoing commissions are the same, there is no legislated maximum however product providers generally pay up to 33%.

Where the insurance product(s) was purchased prior to 1 January 2018, we may continue to be paid commissions in the same manner as what would have previously been advised to you at the time of obtaining the product(s).

Other Benefits We May Receive

Ingenious Brokers has purely commercial relationships with several of Australia's leading life risk and wealth management product providers. These companies may give Ingenious Brokers or your financial adviser non-commission benefits such as entertainment or sponsorship up to a maximum value of \$300 per annum. Both Ingenious Brokers and your financial adviser maintain a Register to document any alternative forms of payment received. These registers are publicly available and must be provided within 7 days after request.

Complaints, Privacy & Compensation Arrangements

We always strive to provide quality advice and service and welcome any feedback that allows us to continue to improve our services.

What to Do If You Have a Complaint.

We are committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice for whatever reason, you should take the following steps:

Step 1: Contact your Adviser.

If you have a complaint or are not satisfied with the advice or services provided to you, you should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

Step 2: Complaints Manager.

If your complaint has not been resolved to your satisfaction, you can contact our Complaint Resolution Manager by:

-  PO Box 1333, South Melbourne Victoria 3205
-  info@ingeniousbrokers.com.au
-  1300 599 512

Step 3: Australian Financial Complaints Authority (AFCA)

If you are not satisfied with our handling of your complaint or our decision, you may refer your complaint to the Australian Financial Complaints Authority (AFCA). The AFCA offers a free independent dispute resolution service for consumer and small business complaints.

-  Australian Financial Complaints Authority GPO Box 3 Melbourne VIC 3001
-  info@afca.org.au
-  1800 931 678 (free call) Email:
-  www.afca.org.au

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

Our Compensation Arrangements

We have professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act. Our professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on our behalf.

Issued by Ingenious Brokers Pty Ltd

Date of Issue 5th July 2022

Financial Services Guide Part 2

Version Number 1.0

Part Two - Adviser Profile

This adviser profile is Part Two of the Ingenious Brokers Pty Ltd Financial Services Guide (**FSG**) dated **1st November 2022** and should be read in conjunction with Part One of our FSG dated **5th July 2022**. Together these documents form the complete FSG.

The individual(s) listed in this FSG are authorised by Ingenious Brokers Pty Ltd to provide general advice through SMSF Insurance Partners Pty Ltd.

Authorised Representative Profile

Corporate Authorised Representative - Profile

Authorised Representative Name	SMSF Insurance Partners Pty Ltd
Authorised Representative Number	1269886
Trading Name	SMSF Insurance Partners
Business Address	Suite 5D, Level 5, 50 Cavill Avenue, Surfers Paradise QLD 4217
Postal Address	Suite 5D, Level 5, 50 Cavill Avenue, Surfers Paradise QLD 4217
Phone	07 3064 0413
Email	admin@smsfip.com.au
Website	www.smsfinsurancepartners.com.au

SMSF Insurance Partners Pty Ltd is a corporate authorised representatives of Ingenious Brokers Pty Ltd.

Authorised Representative - Profile

Authorised Representative Name	David Khera
Authorised Representative Number	464609
Mobile	03 9863 6222
Email	David@smsfip.com.au

David Khera is an authorised representatives of Ingenious Brokers Pty Ltd and a sub authorised representative of SMSF Insurance Partners Pty Ltd

David Khera

Authorised Representative Background

David has been working in the financial services industry since 2013.
David has attained the Diploma of Financial Planning.

David Khera is authorised to provide advice in the following areas:

- Life Products – Life Risk Insurance Products – General Advice Only.
- Life Products – Investment Life Insurance Products – General Advice Only.

How to Contact Me David@smsfip.com.au or 03 9863 6222

Ingenious Brokers Pty Ltd receives all commission for products provided by your Authorised Representative. Ingenious Brokers then pays SMSF Insurance Partners Pty Ltd 100% of all commission received. From this SMSF Insurance Partners Pty Ltd pays David Khera.

How We Get Paid?

Following is a guide as to how commissions and/or fees may be charged

Life insurance (1 st year only)	This commission is payable by the insurance company and is a percentage of the insurer's base premium i.e., premium excluding stamp duty, fire services levy, GST, model loadings or any other government charges, taxes, fees, or levies. For insurance approved from 1 Jan 2020 onwards, the insurance commission can vary from 0% up to 66%. Example: if the annual premium were \$1,000 Ingenious Brokers would receive up to \$660 in the first year based on the maximum.
Life Insurance Commission (Year 2 onwards)	Ingenious Brokers may also receive a renewal commission from the insurance company each year while your policy is in force. This is a percentage of the base annual premium you pay and can vary from 0% up to 33%. Example: if your annual premium is \$1,000 Ingenious Brokers would receive up to \$330 per annum based on the maximum.

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Date of Issue: 1st November 2022

Privacy Policy

Version Number 1.0

Ingenious Brokers Pty Ltd ('**Ingenious Brokers**') respects your privacy and is committed to protecting your privacy. At **Ingenious Brokers**, we understand the importance you attach to information that identifies you (your 'personal information') and we want to help you protect it.

We are bound by and committed to supporting, the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy explains how we handle information that we learn about you when you submit any personal information to us or our associated entities in person, by mail or by email.

How Do We Collect Personal Information from You?

We will only collect personal information which you have voluntarily provided to us or consented to us collecting the information.

We may collect personal information about you in a variety of ways, for example:

- ▶ when you retain our services or apply for employment with us.
- ▶ when you subscribe to our newsletter or mailing list (if applicable).
- ▶ when you contact us or our associated entities, for example by mail, email, or telephone.
- ▶ Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information.

However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

What Type of Personal Information Do We Collect?

The type of personal information we may collect from you includes (but is not limited to):

- ▶ names, dates of birth, gender, address, email, phone numbers, educational qualifications, employment history salary and job titles.
- ▶ information in documents such as passport, driver's licence, tax file numbers (TFNs), Medicare Number.
- ▶ financial information including details of superannuation, insurance arrangements bank account details, shareholdings, and details of investments.
- ▶ sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties.
- ▶ visa or work permit status; and
- ▶ personal information about your spouse and dependants.

How Do We Use Your Personal Information?

Ingenious Brokers and our associated entities will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as accounting or business advisory services. We may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

How Do We Disclose Your Personal Information?

Your personal information will only be disclosed to those employees or consultants of **Ingenious Brokers**, and its associated entities related to the agreed provision of services. Depending on the nature of the engagement, we may need to disclose your personal information to third parties which may include service and content providers (for example accounting or auditing service providers), dealers and agents, or our contractors and advisors.

Ingenious Brokers and its associated entities shall not knowingly provide personal information to any third party for any other purpose without your prior consent unless ordered to do so by a law enforcement body, court of law or other governmental or regulatory body or agency.

Access to Your Personal Information

You can request us to provide you with access to personal information we hold about you by sending us an email:

info@ingeniousbrokers.com.au (no spam please) or writing to us at **4/4 Truman Street, South Kingsville, VIC. 3015**. We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will not apply to lodging a request for access.

Your request to access your personal information will be dealt with in a reasonable time. Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.

Accuracy & Correction

To enable us to keep our records properly, please notify us if you believe that any information, we hold about you is inaccurate, incomplete, or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an e-mail: info@ingeniousbrokers.com.au (no spam please) or writing to us at **4/4 Truman Street, South Kingsville, VIC, 3015**.

Our Security Procedures

Ingenious Brokers takes your privacy and the privacy of its associated entities and their clients very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification, and disclosure. We will also de-identify and destroy the personal information we hold about you once our legal obligations cease. Our security procedures are reviewed from time to time, and we update them when relevant.

However, please be aware that the transmission of data over the Internet is never guaranteed to be completely secure. It is possible that third parties not under the control of **Ingenious Brokers** may be able to access or intercept transmissions or private communications without **Ingenious Brokers'** permission or knowledge. **Ingenious Brokers** takes all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

Data Breach Notification

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth), **Ingenious Brokers** is required to give notice to the Australian Information Commissioner (**OAIC**) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

"Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination, or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.

If you are likely to suffer serious harm from a data breach, we will notify you of:

- ▶ the nature of the eligible data breach (i.e., how the information was accessed or disclosed).
- ▶ the type of information that was accessed or disclosed.
- ▶ the steps that we have taken to control or reduce the harm, and those that we plan to take.
- ▶ any assistance we can offer you, such as arranging for credit monitoring.
- ▶ anything that we can suggest you can do to assist yourself or mitigate the harm.
- ▶ whether the breach has also been notified to the OAIC.
- ▶ how you can contact us for information or to complain; and
- ▶ how to make a complaint with the OAIC.

We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will email the notification.

There are some circumstances in which we do not have to notify you of a data breach. These include:

- ▶ where we have taken remedial action before any serious harm has been caused by the breach.
- ▶ if you have been notified of a breach by another entity.
- ▶ if notification would be inconsistent with Commonwealth secrecy laws; or
- ▶ where the Commissioner declares that notification does not have to be given.

Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

Identifiers

We will not adopt as our own, any government identifiers you may provide to us such as TFNs etc.

Changes to our Privacy Policy

This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will email any changes to you. By continuing to provide us with your information, you confirm your acceptance of these changes.

Complaints Resolution

Ingenious Brokers is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way, we have handled your privacy, please send us an e-mail at info@ingeniousbrokers.com.au or write to us at **4/4 Truman Street, South Kingsville, VIC, 3015**. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe. However, if after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at www.oaic.gov.au

Issued by: Ingenious Brokers Pty Ltd

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