

## Privacy Policy

**Fortuna Advisory Group**  
**Last Updated: November 2025**

### 1. About This Policy

Fortuna Advisory Group and its Related Entities as defined under the *Corporations Act 2001* (Cth) ("Fortuna", "we", "us", "our") is committed to protecting your privacy and the information provided or obtained through its operations. This Privacy Policy explains how we collect, use, disclose, and safeguard your personal information in accordance with the Privacy Act 1988 (Cth) ("the Act"), the Australian Privacy Principles (APPs), and any relevant privacy code registered under the Privacy Act.

The purpose of this policy is to generally inform people of:

- how and when we collect personal information and personal data;
- how we use and disclose personal information and personal data;
- how we keep personal information and personal data secure, accurate and up-to-date;
- how an individual can access and correct their personal information and personal data; and
- how we will facilitate or resolve a privacy complaint.

This policy applies to all services provided by Fortuna Advisory Group, including but not limited to:

- Business Advisory, Tax and Accounting (Fortuna ABA Pty Ltd as trustee for Fortuna Unit Trust ABN 33 640 094 076, Fortuna South West Pty Ltd ABN 81 673 501 301, Fortuna Accountants & Business Advisors Pty Ltd trading as DCC ABN 93 624 035 507, NAV Accountants and Advisors Pty Ltd ABN 39 647 213 447)
- Wealth Management (Fortuna Wealth Management Pty Ltd ABN 19 608 602 277 an authorised corporate of Infocus Securities Australia Pty Ltd ABN 47 097 797)
- Legal Services (Fortuna Legal Australia Pty Ltd ABN 13 693 436 887)
- Managed IT Services (Motive IT Pty Ltd trading as Fortuna Tech ABN 27 064 590 923)
- Finance Services (Fortuna Finance Services Pty Ltd ABN 57 687 878 066)
- Human Resources Services (Fortuna People Solutions Pty Ltd ABN 20 689 593 048)
- Insurance Broking (Fortuna Insurance Services Pty Ltd ABN 38 663 321 033)
- CFO & Bookkeeping Services (Fortuna ABA Pty Ltd as trustee for Fortuna Unit Trust ABN 33 640 094 076, Fortuna South West Pty Ltd ABN 81 673 501 301, Fortuna Accountants & Business Advisors Pty Ltd trading as DCC ABN 93 624 035 507, NAV Accountants and Advisors Pty Ltd ABN 39 647 213 447)

### 2. Information We Collect

The kind of Personal Information that We collect from you will depend on how you use the Website.

We may collect the following types of personal information:

- Contact Information: Name, email address, phone number, postal address, business details;
- Financial Information: Tax file numbers, bank account and credit card details, financial statements, investment information, superannuation details;
- Professional Information: Employment history, business operations, ABN/ACN details, company structure;
- Identification Information: Date of birth, proof of identity documents as required by law;
- Technical Information: IP address, browser type, device information, cookies, and website usage data;
- Marketing Information: Communication preferences, responses to marketing campaigns, mailing list subscriptions;
- Location.

### 3. Types of information

The Act defines types of information, including Personal Information and Sensitive Information.

#### (a) Personal Information

**Personal Information** means information or an opinion about an identified individual or an individual who is reasonably identifiable:

- (i) whether the information or opinion is true or not; and
- (ii) whether the information or opinion is recorded in a material form or not.

If the information does not disclose your identity or enable your identity to be ascertained, it will in most cases not be classified as “Personal Information” and will not be subject to this **privacy policy**.

#### (b) Sensitive Information

**Sensitive Information** is defined in the Privacy Act as including information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive Information will be used by Us only:

- (i) for the primary purpose for which it was obtained;
- (ii) for a secondary purpose that is directly related to the primary purpose; and
- (iii) with your consent or where required or authorised by law.

### 3. How We Collect Information

#### (a) We may collect personal information from you through:

- (i) Direct interactions (forms, emails, phone calls, meetings, consultations)
- (ii) Our website (fortuna.com.au) or related app including contact forms and booking systems
- (iii) Client relationship management systems (including HubSpot and other CRM platforms)
- (iv) Third-party platforms and service providers
- (v) Digital advertising platforms (Facebook, LinkedIn, Instagram, Google Ads)
- (vi) Publicly available sources where relevant to our services
- (vii) Referrals from other professionals or clients

#### (b) Where reasonable and practicable we collect your Personal Information from you only. However, sometimes we may be given information from a third party, in cases like this and whenever reasonably possible, we will take steps to make you aware of the information that was provided by a third party and why, unless special circumstances apply, including as described in this clause below. In general, we will not tell you when we collect personal information about you in the following circumstances:

- (i) where information is collected from any personal referee you have listed on any application form (including any employment application) with Fortuna;
- (ii) where information is collected for publicly available sources including but not limited to, Freedom of Information Act 1982 (Cth), searches, court judgements, directorship and bankruptcy searches, social media platforms (such as Facebook, Twitter, Google, Instagram etc.); or
- (iii) as otherwise required or authorised by law.

### Website Tracking and Cookies

Our website uses cookies and similar tracking technologies to tell us when you use the Website, improve and customise user experience and analyse website performance. As a general rule, however, it is not possible to identify you personally from our use of cookies.

We also use tracking pixels from advertising platforms including Facebook, LinkedIn, Instagram, and Google to:

- Measure advertising effectiveness
- Create targeted advertising audiences
- Analyse website traffic and user behaviour
- Improve our services and marketing

You can manage cookie preferences through your browser settings, though some website functionality may be limited if cookies are disabled.

#### **4. How We Use Your Information**

(a) We collect and use personal information for purposes including:

- (i) - Providing you with the best service experience possible on the Website and keep in touch with you about developments in our business
- (ii) Providing professional services across our eight service divisions
- (iii) - Communicating with you about our services
- (iv) - Processing payments and maintaining financial records
- (v) - Meeting legal and regulatory obligations (including taxation, corporations law, and financial services legislation)
- (vi) - Improving our services and developing new offerings
- (vii) - Marketing and promoting our services (with your consent)
- (viii) - Managing client relationships and service delivery
- (ix) - Conducting credit checks and risk assessments where appropriate
- (x) - Internal business operations and administration

(b) We customarily only disclose Personal Information to our service providers who assist us in operating the Website. Your Personal Information may also be exposed from time to time to maintenance and support personnel acting in the normal course of their duties.

(c) In certain circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where a client would reasonably expect us to and the purpose is related to the purpose of collection).

#### **5. Marketing Communications and Mailing Lists**

Important: By providing your contact details through any Fortuna form, subscribing to our mailing list, or ticking a consent box, you expressly consent to receiving marketing communications from us.

This consent covers:

- Email newsletters and updates
- Information about our services
- Invitations to events and webinars
- Industry insights and resources
- Promotional materials

We will only use your Personal Information for this purpose if We have collected such information direct from you, and if it is material of a type which you would reasonably expect to receive from use. We do not use sensitive Personal Information in direct marketing activity.

Our direct marketing material will include a simple means by which you can request not to receive further communications of this nature, such as:

- Clicking the unsubscribe link in any email;
- Contacting us directly at [support@fortunaadvisors.com.au];
- Updating your preferences through your client portal, if applicable.

Unsubscribing from marketing will not affect service-related communications necessary for delivering our professional services.

#### **6. Information Sharing and Disclosure**

We may share your personal information with:

- (a) Service Providers: Technology providers (including CRM platforms, website hosting, cloud storage), payment processors, professional advisors
- (b) Related Entities: Other divisions within Fortuna Advisory Group to provide comprehensive services
- (c) Professional Partners: Accountants, lawyers, financial advisors, brokers, and other professionals where necessary for service delivery
- (d) Regulatory Bodies: Australian Taxation Office, ASIC, APRA, legal authorities, and other regulatory bodies as required by law
- (e) Third Parties: With your consent, where reasonably necessary or where authorised by law, for example:
  - (i) courts, tribunals, ombudsmen, commissions and regulatory authorities (information provided to courts and tribunals may be made available to other parties to the litigation and will be on the public record);
  - (ii) other parties involved in your matter and their representatives.
- (f) Advertising Platforms: Anonymised or aggregated data may be shared with advertising platforms (Facebook, LinkedIn, Instagram, Google) for remarketing purposes
- (g) Insurers;
- (h) Financial institutions.

We require all third parties to respect the confidentiality of your information and use it only for specified purposes.

## **7. Data Security**

We implement appropriate technical and organisational measures to reasonably protect personal information from unauthorised access, misuse, disclosure, alteration, or destruction. These measures include:

- Secure data storage and transmission protocols
- Access controls and authentication procedures
- Regular security assessments and updates
- Staff training on privacy and confidentiality obligations
- Secure disposal of information no longer required

However, no method of transmission over the internet is completely secure, and we cannot guarantee absolute security.

## **8. Data Retention**

We retain personal information for as long as necessary to fulfil the purposes outlined in this policy, unless a longer retention period is required or permitted by law. Retention periods vary depending on:

- The nature of the service provided
- Legal and regulatory requirements (e.g., taxation records must be retained for at least 7 years)
- Professional standards and obligations
- Ongoing client relationships

When we no longer require your Personal Information for the purpose for which We obtained it, We will take reasonable steps to destroy and anonymise or de-identify it. However, please note that most of the Personal Information that is stored in our client files and records will be kept for a minimum of seven years to fulfill our record keeping obligations.

## 9. Your Rights Under the Australian Privacy Principles

There are 13 Australian Privacy Principles that govern the way in which personal information is to be collected, used, disclosed and stored. The full text of the APPs can be viewed on the [Australian Information Commissioner's website](#).

Under the APPs, your rights include the following:

- Access: Request access to the personal information we hold about you in certain circumstances;
- Correction: Request correction of inaccurate, incomplete, or out-of-date information, subject to certain exceptions;
- Complaints: Lodge a complaint about how we handle your personal information;
- Anonymity: Deal with us anonymously or using a pseudonym where practicable (noting this may not be possible for many professional services due to legal obligations).

To exercise these rights or obtain such access, contact us in writing on the contact details set out at the bottom of this Privacy Policy.

## 10. Overseas Disclosure

Some of our service providers may store or process data overseas and your Personal Information may be transferred to recipients located in:

- United States (e.g., HubSpot, cloud service providers); and
- Other jurisdictions where our technology providers operate.

It is not possible to identify each and every country to which your Personal Information may be sent. If your Personal Information is sent to a recipient in a country with data protection laws which are at least substantially similar to the APP, and where there are mechanisms available to you to enforce protection of your Personal Information under that overseas law, we will not be liable for a breach of the APP if your Personal Information is mishandled in that jurisdiction. If your Personal Information is transferred to a jurisdiction which does not have data protection laws as comprehensive as Australia's, we will take reasonable steps to secure a contractual commitment from the recipient to handle your information in accordance with the APP.

You consent to us transferring your Personal Information to the above jurisdictions in the knowledge that if your Personal Information is mishandled in that jurisdiction, we disclaim responsibility and you will not have a remedy under Australian law.

The jurisdiction may not have data protection laws as comprehensive as Australia's and accordingly, we will take reasonable steps to ensure overseas recipients handle your information in accordance with Australian privacy standards.

## 11. Changes to This Policy

We may update this Privacy Policy from time to time to reflect changes in our practices, technology, legal requirements, or business operations. Updates will be posted on our website with a revised "Last Updated" date.

## 12. Contact Us

If you have questions, concerns, or complaints about this Privacy Policy or our privacy practices, please contact:

Privacy Officer  
Fortuna Advisory Group

147 Colin Street, West Perth, 6005

Email: [support@fortunaadvisors.com.au](mailto:support@fortunaadvisors.com.au)

Phone: 08 9240 4211

We will consider and investigate all complaints and endeavour to respond within 30 days. We may seek further information from you to clarify your concerns. If we agree that your complaint is well founded, we will, in consultation with you, take appropriate steps to rectify the problem. If you are not satisfied with our response or the outcome, you may contact the Office of the Australian Information Commissioner (OAIC), details for which are contained below:

Office of the Australian Information Commissioner

Website: [www.oaic.gov.au](http://www.oaic.gov.au)

Phone: 1300 363 992

Email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## **Your Consent**

By using our website, submitting forms, subscribing to our mailing list, or engaging our services, you acknowledge that you have read, understood, and agree to this Privacy Policy and

1. give the consents given by you in this policy; and
2. have been informed of all of the matters in this policy.

Specific Consent for Mailing Lists: By subscribing to any Fortuna Advisory Group mailing list or ticking a consent box on any form, you specifically consent to receiving marketing communications as outlined in Section 5 of this policy.