



# 360PRIVATE

## Website Disclosure Information

### What you need to know about us

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Liability limited by a scheme approved under Professional Standards Legislation other than for the acts or omissions of financial services licensees.

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## About This Website Disclosure Information

This Website Disclosure Statement (WDS) has been designed to clarify who we are and to help you decide whether to use any of our services. It contains information about:

- The financial services we provide;
- how you will be charged for these services;
- any potential conflict of interest that may exist including:
  - The remuneration we, or any other relevant person, may receive for the services we provide;
  - any associations or relationships that may influence the advice we give you; and
- how we deal with a complaint if you are unhappy with our services.

## Statements Of Advice

In addition to this WDS, when we provide you with financial advice, we will provide you with a written Statement of Advice (SoA). The SoA will describe the strategies, products and services we recommend, details about fees and commissions as well as any associations that may influence the advice.

## Record Of Advice

We may provide you with additional advice related to advice that you have previously received. Where your relevant personal circumstances have not significantly changed, such further advice may be recorded in a Record of Advice (RoA). We may provide you with this RoA or keep it on your file. You can request a copy of this RoA, either verbally or in writing, for up to seven years after the date the advice was given.

## Product Disclosure Statement

With the exception of securities (such as shares and debentures), if we recommend a particular financial product, we will provide you with a Product Disclosure Statement (PDS).

A PDS contains specific information about the financial product recommended including how the product works, its significant risks and expected benefits and how to purchase the product.

To make an informed decision regarding the advice we give you, it is important that you read this WDS, the SoA and, where applicable, the PDS for any financial product recommended.

## Giving Us Instructions

You can give us instructions by telephone, mail, email, fax or by any other means agreed with us. However, if you use a method of communication that is not secure, we may ask you to sign an indemnity.

## About Your Advisor

Your advisor is a salaried employee, acting on behalf of 360Private Pty Limited (“360Private”), holder of Australian Financial Services Licence 458669.

As the licence holder, 360Private has authorised your advisor to provide you with this WDS and is responsible for the financial services provided.

## About 360Private

### Limitation Of Independence

360Private is privately owned and holds its own licence. As we may receive commissions from insurance products and some mortgage products, we are not able to refer to ourselves or our advice as ‘independent’, ‘impartial’ or ‘unbiased’.

## What We Do

360Private will work with you to identify and prioritise your goals, discuss ideas and options to help you grow your wealth, ensure your lifestyle is protected should unforeseen circumstances arise and put in place all that is required to ensure that your estate planning concerns are addressed.

We provide this integrated advice via our distinctive approach:

- Strategic Advice
- Tax and Business Services
- Investment and Portfolio Advice
- Risk Advice
- Succession and Estate Planning
- Superannuation
- Legal Services

In providing financial services to clients, our licence authorises us to deal in and provide advice on the following financial products:

- Basic deposit products
- Non-basic deposit products
- Government debentures, stocks or bonds



- Investment life insurance products
- Life risk insurance products
- Managed investment schemes including investor directed portfolio services
- Securities
- Derivatives
- Foreign Exchange contracts (advice only)
- Superannuation products
- Standard margin lending facilities
- Retirement Savings Accounts (RSA)

We can also assist with:

- Overseeing real estate transactions
- Arranging legal representation
- Liaising with your accountant

### **Financial Product Selection**

Financial product advice must be provided in the best interests of our clients. As a privately owned financial services firm, 360Private researches a wide range of products and services that may be suitable for you.

### **Investment Committee**

In order to meet the requirements of our clients, our Investment Committee has researched a wide range of investment products. Products approved for consideration make up our Recommended List, which is reviewed and evaluated on a regular basis.

Our advisors can only recommend financial products that are not listed on the Recommended List with the prior, written approval of the Licensee.

### **Risk Committee**

In order to meet the requirements of our clients, our Risk Committee has researched a wide range of insurance products. Policies vary greatly from insurer to insurer, not just in price but in their features, benefits, options and policy definitions. 360Private uses a rating service to select a pool of insurance companies with which we will deal regularly. We will usually only consider the policies offered by these insurers or insurance providers.

### **How You Can Pay For Our Services**

You can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any

product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based upon:

- Flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- As a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- by direct invoice from us for initial and ongoing advice;
- via commission we may receive from a product provider when you commence an insurance contract or a credit product; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment method at any time.

We will provide you with details of all fees, commissions or other benefits 360Private may receive when we provide advice to you. Where possible, we will give you the actual dollar amounts. If we cannot provide this accurately, we will provide you with worked examples.

### **Other Fees and Benefits We May Receive**

#### **Brokerage**

360Private has negotiated with several brokers to provide their services at a discounted rate to our clients.

#### **Non-Monetary Benefits**

Sometimes we may receive non-monetary benefits from product providers.

We may attend conferences and professional development seminars that have a genuine education or training purpose. 360Private, or the individual advisor, may pay for the travel, accommodation, non-training related events and functions held in conjunction with the conference or seminar.



We keep a register in which we record details of non-monetary benefits greater than \$300 and those that relate to genuine education and/or training. You can view an extract of the register by contacting us.

### **Payment For Referrals**

If you have been referred to us or we refer you to someone else, we may have arrangements in place to pay or receive a referral fee, commission or other benefit. If we pay a referral fee, the amount, the recipient and how they will be paid will be disclosed to you in your SoA.

### **Credit Commission**

360Private may receive between 0% and 0.75% commission from credit providers on legacy arrangements. This commission may be retained by us or passed onto our clients in the form of a reduced interest rate on their borrowings. No commissions are received for new loan arrangements.

### **When No Personal Advice Is Given**

If you decide not to receive personal advice from us, you may still request information about the fees to which we would have been entitled. However, you should request this information within a reasonable time after receiving this WDS.

### **How We Manage Your Personal Information**

In order to provide you with the financial service you have requested, we have to collect your personal information.

We maintain a record of your personal profile, which includes details of the following:

- Your name, postal and email addresses and telephone numbers;
- contact we have made with you, such as:
  - correspondence;
  - records of meetings and any recommendations made to you; and
  - details of your investment objectives, financial situation and needs.

Protecting your privacy is essential to our business and the information we collect about you is kept securely.

You may examine your file if you wish. All personal information you provide will be treated confidentially and in accordance with our Privacy Policy, which is provided to all new clients. If you would like a copy of our Privacy Policy, please ask your advisor or visit our website at [www.360Private.com.au](http://www.360Private.com.au).

### **Consent To Marketing Activity**

We presume you consent to being contacted by us 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 by phone or email to [Privacy@360Private.com.au](mailto:Privacy@360Private.com.au).

### **Complaints Handling**

If you are unhappy with the advice you receive or any other aspects of our service, please let us know so we can act on it immediately. If your complaint is not satisfactorily resolved, contact our Complaints Officer on 08 8291 2111 or send your written complaint to us at PO Box 946 Unley SA 5061.

We will provide you with full details of our internal and external complaints resolution procedures and will try to resolve your complaint quickly and fairly.

If your complaint isn't resolved within 30 days, or to your satisfaction, you may contact the Australian Financial Complaints Authority (AFCA), of which we are a member. AFCA is an independent, external dispute resolution scheme approved by the Australian Securities & Investments Commission (ASIC). The AFCA service is free of charge.

The contact details for AFCA are:  
Phone: 1800 931 678  
Fax: (03) 9613 6399  
Mail: GPO Box 3 Melbourne Vic 3001  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Web: [www.afca.org.au](http://www.afca.org.au)

ASIC has an informative website [www.asic.gov.au](http://www.asic.gov.au) where you can lodge a complaint online. You may also call ASIC on 1300 300 630 to make a complaint and obtain further information about your rights.

### **Compensation Arrangements**

360Private holds professional indemnity insurance satisfying the requirements of Section 912B of the Corporations Act 2001.

The insurance is subject to terms and exclusions; however, the insurance will continue to cover advice and services provided by current and former representatives of 360Private, whilst they acted on our behalf.



## How We Charge For Our Services \*

<b>Initial Consultation</b>	At our expense
<b>Discovery &amp; Strategy Analysis</b>	\$2,750
<b>Strategic Advice Preparation and Implementation</b>	From \$5,170 depending on the level of complexity of your personal situation and advice requirements.
<b>Ongoing Fee for Advice</b>	From \$4,620 per annum
<b>Ad hoc Services</b>	Where we are engaged on an ad hoc basis, an hourly fee of between \$165 and \$550 may apply.
<b>Ongoing Advice (on investment products - including margin loans)</b>	We do not receive commissions either directly or indirectly from any investment products (including margin loans).
<b>Ongoing Advice (on life insurance products)</b>	Subject to our agreed fee for advice arrangement we may receive commission for our initial and ongoing advice to you. The relevant insurer will pay initial commission between 0% and 66% and ongoing commission between 0% and 22% of the annual premium for as long as you hold the product. Commissions are paid to us by the product provider and are not a direct cost to you.
<b>Pre-existing Arrangements</b>	Commissions are paid to us by the product provider and are not a direct cost to you. Commissions are paid to us by loan providers for some pre-existing loan arrangements.

\* All fees and commissions are presented to you in writing for signed acceptance in advance and are inclusive of GST.



We provide integrated advice via our distinctive approach:

- **Strategic Advice**
- **Tax and Business Services**
- **Investment and Portfolio Advice**
- **Risk Advice**
- **Succession and Estate Planning Advice**
- **Superannuation Advice**
- **Legal Services**



[www.360Private.com.au](http://www.360Private.com.au)