



Privacy Policy

Ironbark Financial Group

Current as of 18 March 2026



Background and Purpose

Ironbark Investment Partners Pty Ltd (ABN 94 136 679 215) and its related companies (consisting of the entities set out in Appendix 1, collectively “**Ironbark Financial Group**”) are committed to maintaining the privacy of individuals. This Privacy Policy (Policy) outlines the way we manage personal information that we collect or that is provided to us. It applies to all Australian companies in the Ironbark Financial Group (“**Ironbark**”, “**we**”, “**us**”).

Ironbark is bound by the Privacy Act 1988 (Cth), as amended from time to time (**Privacy Act**) and the Australian Privacy Principles (**APPs**) for the handling of personal information.

This Policy outlines:

- the types of personal information that Ironbark usually collects and holds;
- how we collect and hold personal information;
- the purposes for which we collect, hold and disclose personal information;
- how you may access the personal information that Ironbark holds about you and seek correction of that information; and
- how you may complain about a breach of the APPs and how the complaint will be dealt with.

We may amend this Policy from time to time. The current version will be posted on our website at <https://www.ironbarkfg.com.au/privacy-policy>. All amended terms will automatically take effect immediately on posting.

In accessing any Ironbark website or otherwise providing us with your personal information, you agree to the Policy conditions set out below and consent to the collection, use and disclosure of that information in accordance with the Policy and Privacy Act (including the APPs) and other applicable privacy laws.

Personal Information

‘Personal information’ has the meaning given to it under the Privacy Act and generally means information or an opinion about an identified individual or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

‘Sensitive information’ is a subset of personal information that includes 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.

Unless stated otherwise, references to personal information in this Policy include sensitive information.

What kinds of personal information do we collect and hold?

Information collected in connection with products and services

Ironbark provides a range of products and services to different categories of clients. The kinds of personal information we collect, and hold, will depend on the particular product or service being provided and our legal and regulatory obligations.

This may include:

- **Identification and contact information**, such as your name, residential or postal address, date of birth and contact details;
- **Financial information**, including details of your financial circumstances, assets and liabilities;
- **Banking, investment and transaction information**, where relevant to the services we provide;
- **Accounting and taxation information**, including payroll details and records and taxation details, and other accounting and financial services related information, where we provide accounting or taxation services;
- **Tax File Number (TFN) information**, where we are authorised by law to collect it and you choose to provide it; and
- **Insurance-related information**, including details of the insured person or asset, beneficiaries, and (where relevant) health and financial information, depending on the type of insurance product.

Sensitive information

In certain circumstances, we may collect sensitive information (as defined under the Privacy Act) where it is reasonably necessary for us to provide a product or service and where permitted by law. Where required, we will obtain your consent before collecting such information.

For example, we may collect health information to assess an insurance application or claim, or biometric information (such as voice data) to verify your identity or authorise transactions.

Ongoing information collection

During the course of your relationship with us, we may collect and hold additional personal information, including:

- records of transactions;
- records of communications, enquiries or complaints; and
- additional information required to assess or manage an insurance claim or other service request.

We only collect personal information that is reasonably necessary for the relevant purpose.

Information collected from job applicants

If you apply for employment or engagement with Ironbark, we may collect personal information reasonably necessary to assess your application and manage any resulting employment or engagement.

This may include your:

- name, date of birth, and contact details (including address, email and phone number);
- identification information (e.g. passport information, driver's licence or other forms of identification);
- employment history and qualifications;
- regulatory or accreditation records;
- employment references;
- directorship and property ownership details;
- citizenship and right to work in Australia documents (e.g. VEVO records);
- social media;

- credential information; and
- other relevant background information.

Where permitted by law, we may also collect sensitive information, such as criminal history information and police records. We may collect this information from you or, where appropriate, from third parties such as referees or recruitment providers.

How does Ironbark collect personal information?

Ironbark must collect personal information only by lawful and fair means. We will generally collect personal information about you directly from you. However, in some circumstances, we may collect your personal information from another person if you consent, if we are required or allowed by law to do so, or if it would be unreasonable or impracticable for us to have to collect it from you.

We may collect your personal information in different ways depending on how you interact or deal with us, including:

- from you directly when you contact us or our service providers by telephone or email;
- through your interaction with our website or social media platforms;
- when you complete an application form;
- through you meeting or having discussions with one of our Ironbark representatives; and
- from publicly available sources, including public registers and social media.

In some circumstances, Ironbark may collect information about you from third parties. For example, Ironbark may collect personal information about you from:

- your representatives, professional advisors, or anyone authorised to act on your behalf (for example if we collect information from your accountant, financial advisor, legal advisor, mortgage broker, executor, administrator, guardian or trustee);
- our service providers (such as our third-party identity verification service providers) and other third parties with whom we interact in order to provide our financial products and services;
- your employer, where you are acting as a representative of your employer in dealing with us;
- corporate clients, where we are providing services; and
- referees, where you are a prospective employee.

How does Ironbark use your personal information?

Any personal information we collect from you may be made available to, or used by your adviser, employees of Ironbark or any related entity carrying out functions on behalf of Ironbark for purposes related to the provision of financial services. This may include:

- making investment recommendations;
- reviewing your investment recommendations; or
- verifying your identity and for customer due diligence purposes.

Ironbark may also collect, hold, use or disclose your personal information to:

- facilitate Ironbark's business activities;
- facilitate your participation in any event that is hosted by Ironbark;
- provide you with information about our products and services or respond to queries you submit to us;
- process and administer any employment application you may make to us from time to time;
- manage, develop and enhance our products and services;
- consider any feedback (including a complaint) that you raise with or involving Ironbark;
- prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- identify you or establish your tax status under any Australian or foreign legislation;
- comply with any relevant laws, regulations, codes of practice and court orders;
- consider applicants to provide goods or services to Ironbark; and
- comply with our legal obligations, resolve any disputes, and enforce our agreements and rights with third parties.

We may also use your personal information for purposes related to those described above which would be reasonably expected by you. We will not use your information for purposes other than those described above unless we have your consent or as permitted by law.

Consequences of not providing your personal information

You are not obliged to provide your personal information. However, if you decide not to give information needed to provide you with services, you may not be able to receive those services.

How does Ironbark deal with direct marketing?

In addition to the purposes set out above, we may collect, use and disclose your personal information to inform you of products, services or offers of Ironbark or its related companies which may be of interest to you. Where you are an investor in an Ironbark financial product or a client of the Ironbark Financial Group, this may include providing you with direct marketing information regarding other financial products or services of Ironbark that we think may be of interest to you.

If you do not want to receive this information or do not want us to use or disclose your personal information for direct marketing purposes, you can opt out by letting us know (using the contact details set out in this Policy) that you wish to opt out of receiving this information and/or Ironbark using or disclosing your personal information for direct marketing purposes.

How does Ironbark secure and store your personal information?

We store your personal information in hard copy and electronically, and some data will be stored with our third-party providers. We will take reasonable steps to protect your personal information from misuse, interference and loss, and from unauthorised access, modification and disclosure.

Once your personal information is no longer required by us, we will take reasonable steps to destroy or permanently de-identify that personal information, except in circumstances where we are required by law to retain it.

How is personal information disclosed to others?

In the course of providing our financial products and services to you, we may disclose your personal information to our related parties or third-party service providers that perform a range of services on our behalf, some of which include:

- mailing house or printing services;
- custodians and administrators;
- product and credit providers;
- registry and platform providers;
- auditors and solicitors;
- insurance providers;
- information technology service providers;
- settlement and clearing organisations;
- stockbrokers;
- organisations undertaking compliance reviews of our company or other due diligence undertaken on us or our representatives; and
- other consultants or service providers.

Depending on the nature of the financial product or service that Ironbark provides, we may disclose your personal information to your nominated representative (such as your accountant or financial adviser) and their respective service providers.

We may also disclose your personal information to law enforcement agencies, courts or government agencies where required to comply with specific legal requirements.

Some of the parties that Ironbark discloses your personal information to may be located outside of Australia, including the Philippines, India and the United States of America. When we send personal information overseas or use service providers that handle or store personal information outside of Australia, we require them to take steps to keep your personal information safe and use it appropriately.

Cookies

Ironbark may collect information based on how you use Ironbark's website or digital media. Ironbark uses "cookies", analytic tools and other data collection methods to collect anonymous information on website users and their activities. Cookies are small text files that are placed on your computer by the websites that you visit. Cookies are widely used in order to make websites work or for efficiency, as well as to provide information to the owner of the website.

Information Ironbark collects may include (but is not limited to):

- how the website is found;
- which pages are viewed; and
- the frequency a visitor may come to the website.

This information is combined into an overall picture of the nature of the person who uses our website and does not individually identify you. This information is collected for use within Ironbark and by preferred vendors for our analysis, to measure the success of our digital advertising and social media, and to improve our ability to provide relevant information and content to users. No attempt is made by Ironbark to personally identify you through your

use of the website, except when you submit a digital form. If you complete and submit a form on our website or a social media channel, you agree to enter your information onto those platforms. The information we collect is stored, accessed and used by us to administer those platforms as required.

If you are uncomfortable with the use of cookies, you can manage and control them through your browser settings including by deleting them from your 'browser history' (cache) when you leave the website.

If you access your account information online, we will use cookies to track your use of our website. This information is collected for security purposes and to protect the integrity of your account details. Your secure information may be accessed by an agreed third-party provider that may host your information on behalf of Ironbark. You can authorise third parties (such as your financial adviser) to have access to your information on a secure website. Specific terms and conditions may apply in these circumstances.

How can you access or correct your personal information?

We will endeavour to ensure that the personal information collected from you is up to date, accurate and complete.

You may request access to, or correction of, the personal information we hold about you at any time by contacting our Privacy Officer using the details below. We may need to verify your identity before responding to your request and may ask you to provide us with additional information as part of such verification.

Subject to any applicable exceptions or requirements, we will provide you with access to the personal information you request within a reasonable time. If we decide to refuse your request, or it is not possible to give you access, we will tell you why in writing and how you can complain if you are not satisfied with our decision.

You will not be charged for making a request for your personal information. However, we may charge a fee to provide your information to cover administrative costs (including for supervised inspection). We will inform you of any fee at the time your request is made.

How can you complain if you have concerns about how Ironbark has managed your personal information?

Where you may have a complaint relating to how Ironbark has managed your personal information, please contact our Privacy Officer using the details below. Ironbark will take any privacy complaint seriously and, where possible, we will seek to respond to privacy complaints within 30 days of the date of the complaint.

If we cannot resolve your complaint within 30 days, we will contact you to advise you of the estimated response timeframe for your complaint.

What can you do if you have not received a response to your complaint or you are unhappy with the outcome?

If a complaint remains unresolved or you are unhappy with the outcome, you may contact the Office of the Australian Information Commissioner (OAIC) or the Australian Financial Complaints Authority (AFCA).

The OAIC contact details are below:

Phone 1300 363 992

Online Enquiry www.oaic.gov.au/contact-us

Website <http://www.oaic.gov.au>

Address Office of the Australian Information Commissioner
GPO Box 5288
Sydney NSW 2001

The AFCA contact details are below:

Phone 1800 931 678

Email info@afca.org.au

Website www.afca.org.au

Address Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

How to contact us

If you have any questions about this Policy or you wish to access or correct your personal information, please contact Ironbark's Privacy Officer:

Phone 1800 034 402

Email Privacy@ironbarkfg.com.au

Address Privacy Officer
Ironbark
Level 14, 1 Margaret Street
Sydney NSW 2000

Appendix 1 – Entity Subsidiaries List

The following list includes entities that are owned or controlled by Ironbark’s subsidiary entities.

Ironbark Advice	Invest Blue Pty Ltd ABN 91 100 874 744
	Invest Blue Support Pty Ltd ABN 69 126 171 766
	Invest Blue Finance Pty Ltd ABN 35 661 784 541
	Invest Blue Armidale Pty Ltd ABN 65 150 875 960
	Invest Blue Brisbane Pty Ltd ABN 22 150 876 145
	Invest Blue Coffs Harbour Pty Ltd ABN 89 150 874 810
	Invest Blue Gladstone Pty Ltd ABN 47 128 588 367
	Invest Blue Norwest Pty Ltd ABN 79 601 011 545
	Invest Blue Penrith Pty Ltd ABN 72 600 505 717
	Invest Blue Terrigal Pty Ltd ABN 96 607 689 823
	Invest Blue Direct Pty Ltd ABN 31 127 861 661
	Advice First Pty Ltd ABN 74 159 662 012
	Advisory Group Pty Ltd ABN 46 003 824 333
	Artt Group Pty Ltd ABN 90 632 171 576
	Beacon Aged Care and Retirement Advisers Pty Ltd ABN 62 668 254 564
	Brisbane Financial Services Pty Ltd ABN 29 141 800 099
	CBS Financial Pty Ltd ABN 13 114 663 866
	Cornerstone Financial Group Pty Ltd ABN 92 099 426 507
	CountryWide Advice Pty Ltd ABN 80 648 237 914
	DKM Group Pty Ltd ABN 72 124 432 640
	DKM Investment Services Pty Ltd ABN 94 098 224 401
	Elevate Financial Solutions Pty Ltd ABN 43 003 869 323
	Emohruo Financial Services Pty Ltd ABN 95 105 755 897
	Financial Independence Planners Pty Ltd ABN 41 074 337 769
	GR & LC Thompson Pty Ltd ABN 30 147 852 462
	Growup Financial Pty Limited ABN 23 156 293 499
	Hobart Financial Planning No. 2 Pty Ltd ABN 94 009 574 814
	Jeff Shakespeare & Associates Pty Ltd ABN 27 001 854 397
	JSA Accounting & Tax Pty Ltd ABN 66 136 025 397
	JSA Group Holdings Pty Ltd ACN 606 832 124
	Lambert Group Management Pty Ltd ABN 52 643 209 670
	Lambert Group Future Planning Pty Ltd ABN 83 628 314 778
LDK Holdings Pty Ltd ABN 11 643 209 054	
LFC Advice Pty Ltd ABN 19 647 509 466	

	<p>LFC Group Pty Ltd ABN 35 644 576 965</p> <p>Mason Finance Group Pty Ltd ABN 29 650 359 069</p> <p>Ogilvie Financial Services Pty Ltd ABN 60 086 414 011</p> <p>Powers Wealth Pty Ltd ABN 40 091 801 231</p> <p>The Bravien Group Pty Limited ABN 97 102 236 359</p> <p>TDT (TAS) Pty Ltd ABN 32 142 013 947</p> <p>Vintage Wealth Pty Ltd ABN 83 161 712 572</p> <p>Wainscott Financial Planning and Advice Pty Ltd ABN 39 631 987 963</p>
Ironbark Private Wealth	<p>Affinity Private Advisors 1 Pty Ltd ABN 29 632 363 672</p> <p>Avanti Advisers Pty Ltd ACN 612 423 051</p> <p>Avanti Financial Group Pty Ltd ABN 75 625 789 184</p> <p>Lifewealth Partners Pty Ltd ABN 11 093 428 034</p> <p>Lifewealth Pty Ltd ABN 79 100 448 182</p> <p>Mercury Private Holdings Pty Ltd ABN 16 603 739 402</p> <p>Mercury Private Operating Company Pty Ltd ABN 40 603 741 108</p> <p>Mercury Private Tax and Accounting Pty Ltd ABN 94 603 741 340</p> <p>Mercury Private Pty Ltd ABN 70 603 580 927</p> <p>Paradigm Advice Holdings Pty Ltd ABN 85 628 988 303</p> <p>Paradigm Group Investments Pty Ltd ABN 85 600 235 603</p> <p>Paradigm Wealth Advisors Pty Ltd ABN 77 005 666 919</p> <p>Paradigm Wealth Management Pty Ltd ABN 97 101 700 949</p> <p>Spring Street Asset Management Pty Ltd ABN 45 114 924 382</p> <p>Think Super Solutions Pty Ltd ABN 55 140 669 094</p>
Ironbark Investment Solutions	<p>Ambassador Funds Management Services Pty Ltd ABN 91 133 740 057</p> <p>IBWM Pty Ltd ABN 28 621 141 026</p> <p>Ironbark Asset Management (Fund Services) Limited ABN 63 116 232 154</p> <p>Ironbark Asset Management Pty Ltd ABN 53 136 679 420</p>