

# Financial Services Guide

1 February 2021

## Version 19

## Part Two

*This document is part of a Financial Services Guide and should be read in conjunction with Part 1 (A Guide to Our Relationship with You and Others) version 19, dated 1 February 2021. This is an important document that will introduce your adviser, Jason Bragger.*

### Authorised Representative Profile

Your adviser is Jason Bragger, an Authorised Representative of Paragem. Jason's ASIC Authorised Representative number is 250037.

Jason has spent the last 25 years in the Financial Services industry in a variety of roles. His background in Applied Mathematics and Financial Modelling led to several years Actuarial experience in Financial Product Valuations at National Mutual and then AXA. He also studied Macro and Micro-economics at Melbourne University.

Jason has been running a financial service business and advising clients in Brisbane for the last 20 years and is a Certified Financial Planner. This is internationally recognized as the highest available qualification in Financial Planning.

Jason's business, Dolfinwise, is also an Authorised Representative of Paragem (Authorised Representative number 439918).

Dolfinwise contact details:

Phone: (07) 3832 5777

Fax: (07) 3832 5778

Address: Level 2, Silvertown Place, 101 Wickham Tce, SPRING HILL QLD 4000

Postal: GPO Box 3091, BRISBANE QLD 4001

Dolfinwise is a registered business name of the partnership of Cameron Renshaw and Associates Pty Ltd and the Dolfinwise Trust.

Jason Bragger is authorised by Paragem to advise and deal in the following financial products:

- ✕ Deposit products (Cash and Term Deposits)
- ✕ Debentures, stock and bonds issued by a government
- ✕ Life Insurance risk products
- ✕ Life Insurance investment products
- ✕ Managed Investment Schemes (Unit Trusts)
- ✕ Securities (shares)
- ✕ Superannuation including Self Managed Superannuation Funds
- ✕ Retirement Savings Accounts
- ✕ Standard Margin Lending Facilities

## Remuneration

You may pay us a fee for service and advice, and we may also receive commissions from product issuers if you engage us to provide advice, implement our recommendations or act on your instructions. Relevant costs or fees will be discussed and approved by you prior to any services being provided.

Paragem will pay between 90% and 92% of the fees, commissions and additional commissions detailed in this schedule to Dolfinwise, with Paragem retaining the balance.

As a partner in Dolfinwise, all revenues received on behalf of Jason Bragger's clients are disbursed to Dolfinwise Pty Ltd ATF Dolfinwise Trust. Jason Bragger is the director of Dolfinwise Pty Ltd and will receive a salary as well as being a potential beneficiary of any distributions from the Dolfinwise Trust.

## Advice Fees

### Ongoing Advice - Annual

A fee is charged for the provision of our ongoing advice service. This includes the implementation of our recommendations, reviewing of strategies and investments and any changes required throughout the year. The fee will be quoted to you before advice is provided and is payable within 14 days of an invoice being provided.

<b><u>Indicative Annual Fees - Ongoing Advice Annual</u></b>	
Advice Type	Fee including GST
Standard Advice	\$2,200 to \$6,600
Business clients/Complex clients	\$6,600 - \$33,000

We prefer direct payment of our fees but may be able to facilitate payment from a product held on occasion where this is requested.

### Statement of Advice – Initial One-off Fee

A fee is charged for the research, preparation and delivery of this document. The fee will be quoted to you at your first appointment and is payable within 14 days of the delivery of our advice.

<b><u>Indicative Fees - Initial Statement of Advice</u></b>	
Advice Type	Fee including GST
Standard Advice	\$1,650 to \$6,600
Insurance Only Advice	\$550 to \$1,100

## Implementation of Insurances

We offer all clients the option of remunerating us for insurance advice via a fixed fee. If a fixed fee is agreed, then we will remove the commissions that would otherwise be paid to us by the product provider and this will result in a decrease in the policy premiums.

If you choose to pay us fully or partially via commission, then the following will apply: We will receive an upfront commission of between 0% and 66% of the first year's annual premium, and then an annual ongoing commission of between 0% and 22% of the annual premium.

For example, for an insurance product with an annual premium of \$2,000, where the issuer pays us an upfront commission of 66%, we will receive \$1,320. The issuer will pay us 22% of the annual premium as ongoing commission for as long as you hold the product. Assuming an annual premium of \$2,000, this equates to \$440 per year.

There will be a 100% clawback of commission where the life insurance policy is cancelled, not continued or reduced in the first year and 60% clawback of commission in the second year.

## Potential Conflicts of Interest

### Ownership

Paragem is a wholly owned subsidiary of Easton Investments Limited, an ASX listed company that provides services to financial advisers and accountants in the areas of licensing, training, education and client engagement. Easton Investments Limited has a material shareholder, Hub24 Limited, which offers a leading investment administration and reporting platform to the Australian marketplace. We are obliged to always act in a client's best interests and will only recommend the use of the HUB24 platform if it is appropriate to do. We continue to use other platforms to implement our investment advice and you are free to request an alternative platform if you would prefer.

## Referral Payments

We do not pay or receive any form of referral payments.

## Privacy Statement

### The privacy of your personal information is important to us.

Paragem and we will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. The ways we do this include:

- To protect your interests, we will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. limiting physical access to our premises.
- limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access and committee members only have access to the contact details of members of their own committee and no other committees);
- requiring any third-party providers to have acceptable security measures to keep personal information secure; and
- putting in place physical, electronic, and procedural safeguards in line with industry standards.

If we no longer require your personal information and are not legally required to retain it, Standards Australia will take reasonable steps to destroy or permanently de-identify the personal information.

## **1. Your representative will ask you many questions. Why is so much information required?**

We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. We are required by law, including the Corporations Act and Taxation laws to collect personal information before we provide you with advice and services. You are not obliged to provide the information we request but, if you do not, we may not be able to provide you with advice or services.

From time to time other laws, regulations or directions may also require, or authorise, us to collect personal information.

We prefer to obtain information from you directly and will generally gather the information we require by asking you questions about you and possibly your family. We will record this information. We endeavour to retain accurate, complete and up to date personal information about you, so we will ask you to review the information from time to time.

If the information you provide to us is incomplete or inaccurate this will impact on our analysis of your requirements and may result in advice that is not appropriate to your needs and circumstances. If this does occur, you will need to make your own assessment concerning the appropriateness of our advice.

At times, we may collect personal information from someone other than yourself and you may not be aware that we collect or have collected this information.

## **2. Access and correction**

You may (subject to permitted exceptions) access, update or correct your information by contacting us. If we are unable to provide you with access to your information, we will provide you with the reasons for our position. We will endeavour to ensure that the personal information we retain about you is up to date and accurate. Please appreciate that the accuracy of the information we retain is dependent to a large degree on the information you provide, so please advise us if there are any errors or omissions.

## **3. Providing personal information**

We may provide personal information to:

- organisations (who are bound by strict confidentiality) to whom we outsource certain functions, such as our auditors (in these circumstances, information will only be used for our purposes);
- other professionals, such as solicitors, accountants, stockbrokers and mortgage brokers, as well as other advisers specialising in aged care, Centrelink, insurance or investment when a referral is required.
- entities based overseas (see below for details); or
- third parties when required to do so by law, e.g. legislation or Court Order.

## **4. Overseas disclosure**

Sometimes we need to provide personal information to or get personal information about you from persons located overseas. For example, we may outsource a function involved in the financial planning business to someone based overseas. Nevertheless, we will always disclose and collect your personal information in accordance with Privacy Principles.

## **5. Identifiers**

Although in certain circumstances we are required to collect government identifiers such as tax file numbers, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## **6. Dealing with us anonymously or using a pseudonym**

The nature of the provision of financial services does not lend itself to treating customers with anonymity. All transactions require personal information about the individual for whom the transaction is being completed.

In some instances, we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client.

You can deal with us anonymously only where it is lawful and practicable to do so.

## **7. Marketing practices**

Every now and then we might let you know about news, products and services that you might be interested in, via mail, email, SMS, telephone or online. We will do so unless you tell us that you are not interested in receiving this information. You can contact us at any time to update your marketing preferences.

## **8. Sensitive information**

We will not collect sensitive information about you, for example where information is provided by you for insurance or risk purposes, without your consent. Exceptions to this include where the information is required by law or for the establishment, exercise or defence of a legal claim.

## **9. Privacy complaints**

If you believe your privacy has been breached or you have a privacy complaint you should write to the Privacy Officer at Paragem, by email at [info@paragem.com.au](mailto:info@paragem.com.au) or at GPO Box 4463, Sydney NSW 2001.

If Paragem does not satisfactorily address your complaint you can escalate it to the Office of the Australian Information Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au).

## **10. Our Privacy Policy**

If you require more information, please ask for a copy of our Privacy Policy or refer to current version of this Privacy Policy on Paragem's website ([www.paragem.com.au](http://www.paragem.com.au)). This Privacy Policy will be reviewed from time to time to take account of new laws, technology, changes to our operations, practices and the changing business environment.