

Financial Services Guide

18 March 2019

Version 11 Part Two

Authorised Representative Profile

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 17, dated 18 March 2019.

Your adviser is Bronnie Abraham, an Authorised Representative of Paragem. Bronnie's ASIC Authorised Representative number is 439919.

Bronnie has spent the last 9 years working for Dolfinwise in a variety of roles and has significant experience in insurance, superannuation, retirement planning and wealth creation. She has a Bachelor of Commerce, majoring in both Financial Planning and Accounting, which she completed at Griffith University.

Bronnie is a Certified Financial Planner™. This is internationally recognised as the highest available qualification in Financial Planning. She has also been appointed as a Commissioner for Declarations (C.Dec) for the State of Queensland.

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

Dolfinwise contact details:

Phone: (07) 3832 5777

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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.

Bronnie Abraham 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

Remuneration

The following is a schedule of the fees that are payable for our services and/or the commissions we may receive from product issuers. Note that you may pay a fee for a service and we may also receive commissions for Insurance business as a result of you accepting our recommendations. The costs applicable to the services you require will be discussed with you by your adviser.

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.

All revenues received on behalf of Bronnie Abraham's clients are disbursed to Dolfinwise Pty Ltd ATF Dolfinwise Trust. Bronnie Abraham receives a salary from Dolfinwise Trust.

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 at your first appointment and is payable within 14 days of the delivery of the initial advice.

Where we are implementing recommendations to buy, sell or switch investments that have any form of commission attached we will rebate this back to our Ongoing Advice Clients wherever possible. Where it is not possible to rebate this back the ongoing fee payable will be reduced by a corresponding amount.

<u>Indicative Annual Fees - Ongoing Advice Annual</u>	
Advice Type	Fee including GST
Standard Advice	\$2,200 to \$6,600
Business clients/Complex clients	\$6,600 - \$11,000

Payments can be made by cheque or direct bank transfer. We prefer direct payment 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.

<u>Indicative Fees - Initial Statement of Advice</u>	
Advice Type	Fee including GST
Standard Advice	\$1,650 to \$5,500

Dolfinwise offers a money back guarantee should you decide the initial advice does not add more value than it costs.

INVESTMENT PRODUCTS

1. Dolfinwise and Bronnie Abraham do not accept any initial commissions from the issuers of the investment products.
2. The issuers of the investment products we recommended prior to 1st July 2013 may pay an ongoing commission. For clients who have signed an ongoing service agreement with Dolfinwise and pay us directly, where we cannot have this commission cancelled by the product issuer we will rebate this commission back to you via a reduction in your annual invoice.

For clients who do not have an ongoing service agreement with Dolfinwise and invested prior to 1st July 2013 this commission which can vary depending on the product and manager is generally in a range of between 0% and 1% of the balance in your account per annum.

For example, if your account balance was \$11,000 and we charged 1% ongoing commission we would receive \$110 per annum.

IMPLEMENTATION OF INSURANCES

We offer all clients the option of remunerating us for insurance advice via a fixed fee. If this is agreed then we will rebate all commissions back to the client. If clients choose to pay us via commissions, then the following will apply.

Commissions can be received for life insurance products with the exception of life insurance implemented after 1 July 2014 for a member in a default superannuation or a group life policy in a superannuation fund.

The issuers of certain insurance products I recommend may pay an initial commission. This commission can vary depending on the product and insurer. The maximum initial commission that will be accepted is 77% (inclusive of GST) of the initial annual premium you pay in the first year.

For example if your premium is \$500 and the insurer pays us 50% we will receive \$250.

In addition

The issuers of the insurance products I recommend may pay an ongoing commission when you renew your policy. The maximum renewal commission that will be accepted is 22% (inclusive of GST).

For example if your renewal premium is \$550 and the insurer pays us 10% we will receive \$55.

Potential Conflicts of Interest

OWNERSHIP

Paragem Pty Ltd, our licensee, is a wholly owned subsidiary of HUB²⁴ Limited, an ASX listed company that provides an investment administration and reporting platform. If you use the HUB²⁴ platform, Paragem's employees and Authorised Representatives may benefit financially by virtue

of being shareholders in the company. The principals of Dolfinwise are shareholders of HUB²⁴, either directly or through a related entity.

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 so. We also continue to use other platforms to implement our investment advice. If you would like additional information on how HUB²⁴ compares to other platforms or would like to use an alternative platform please let us know.

ADDITIONAL PAYMENTS

Dolfinwise may also receive additional bonuses from fund managers calculated on the aggregated amount of funds it has placed with the platform provider. The additional commission is calculated as a percentage of the administration fee after the deduction of all costs. Therefore the amount is already included in the fees the product provider deducts from your investment account or insurance premium. The percentage will increase as certain totals are reached. If an additional commission results from advice that Dolfinwise provides to you then specific details of that arrangement will be provided with the advice. We are only able to receive these commissions where we had an existing arrangement with the platform provider prior to the 1st of July 2013.

Privacy Collection Statement

The privacy of your personal information is important to us.

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. Under the following Australian laws we may be authorised or required to collect your personal information:

- Corporations Act 2001,
- Australian Securities and Investment Commissions Act 2001,
- Anti Money Laundering and Counter Terrorism Financing Act,
- Taxation Administration Act 1953,
- Superannuation Guarantee (Administration) Act 1992, and
- Superannuation (Unclaimed Money and lost members) Act 1999,

as those acts are amended and any associated regulations. From time to time other acts may require or authorise us to collect your personal information.

We are required to collect sufficient information to identify a person's needs, objectives and financial circumstances so that we can provide appropriate financial advice.

We will gather the information by asking you numerous 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 and update your information by contacting us. You may access the personal information we retain and request corrections. This right of access is subject to some exceptions allowed by law. We will give you reasons if we deny access though will endeavour to ensure that at all times the personal information about you that we hold is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide and you should advise us if there are any errors in your personal information.

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 identifies 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 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 engage in marketing unless you tell us otherwise. 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 or at PO Box R1135, Royal Exchange NSW 1225.

If Paragem does not satisfactorily address your complaint you can escalate it to the Office of the Australian Information Commissioner: 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 Paragem's website.