

# FINANCIAL SERVICES GUIDE

Dated 8 September 2022      Version 5

## ABOUT THIS DOCUMENT

The Purpose of this Financial Services Guide (FSG) is to provide you with important information before a financial service is provided to you as well as the remuneration that may be paid in relation to the financial services offered so you can make an informed decision about whether to use our services.

This FSG is provided by Ellastone Financial Planning ABN 12 205 593 819 and your adviser ("we", "us", "our") and is authorised by Australian Investment and Insurance Group ACN 068 486 126 ("AIIG", "Licensee"), which is our authorising Australian Financial Services licensee. Your adviser will provide you with an FSG and their Adviser Profile prior to providing any personal financial advice. The FSG should be read in conjunction with the Adviser Profile.

The FSG contains information about:

- The entities that may provide you with financial services and how we can be contacted;
- The financial services that we are authorised to provide;
- Our service offering and remuneration;
- Who to contact if you have a complaint; and
- Our Privacy Policy.

Please retain this FSG for your reference and any future dealings with us.

## ABOUT US

Ellastone Financial Planning and your adviser, Mark Tyminski (Authorised Representative No. 307441), is the providing entity and authorised representative of Australian Investment & Insurance Group Pty Ltd ("AIIG"). The providing entity is the authorised representative of AIIG. You can provide instructions to us by using the contact details below:

ABN: 12 205 593 819  
PO Box 59, HOVE SA 5048  
T: 0434 360 360  
E: [mtyminski@ellastone.com.au](mailto:mtyminski@ellastone.com.au)

## ABOUT OUR LICENSEE

Australian Investment and Insurance Group (AIIG) holds an Australian Financial Services Licence (No. 226405) granted by the Australian Securities and Investments Commission. AIIG always acts on your behalf when the financial services are provided to you, by either Ellastone Financial Planning or your adviser.

AIIG's details are:

ABN: 93 068 486 126      ACN: 068 486 126  
215 Grenfell Street, Adelaide SA 5000  
T: (08) 8338 5155  
E: [info@aiig.com.au](mailto:info@aiig.com.au)  
W: [www.aiig.com.au](http://www.aiig.com.au)

## YOUR ADVISER

Please refer to the Adviser Profile for information about your adviser. The Adviser Profile contains information about:

- Your adviser's Authorised Representative number and/or Corporate Authorised Representative Number, if applicable;
- Your adviser's experience, qualifications and accreditations;
- The products and services they can offer; and
- Any applicable referral arrangements.

## LACK OF INDEPENDENCE

Ellastone Financial Planning and your adviser, Mark Tyminski (Authorised Representative No. 307441), is not able to describe itself as being independent, impartial, or unbiased because:

- We receive commissions from insurance product providers (where the law permits) for the advice we provide;
- Our Licensee, AIIG, is a wholly owned subsidiary of Amalgamated Australian Investment Group Ltd. Amalgamated Australian Investment Group is an issuer of financial products, some of which are included in our Approved Product List (APL).

However, please note that this does not affect our ability to act in your best interests when providing advice to you.

## OTHER DOCUMENTS YOU MAY RECEIVE

### ADVICE DOCUMENTS

You will be provided with a Statement of Advice (SOA) on the first occasion that we provide you with advice which considers your personal circumstances, goals, needs and objectives.

Following our initial advice, we will document subsequent advice in a SOA or, in some circumstances, a Record of Advice (ROA). If the ROA is not provided to you at the time the advice is provided you may request a copy and it will be provided to you free of charge.

The SOA or ROA will contain:

- the details of the areas you are seeking advice on;
- the basis on which the advice is given;
- the advice itself; and
- information about fees, commissions and associations which may have influenced the provision of the advice.

We will retain copies of each SOA and ROA for a period of seven years from the date of the advice. Please contact your financial adviser should you require a copy.

### PRODUCT DISCLOSURE STATEMENT (PDS)

In the event we make a recommendation to acquire a financial product (other than securities), we will provide you with a PDS or Investor Directed Portfolio Service (IDPS) Guide containing information on that particular product. The document will contain information about the relevant key features, fees, benefits, and risks to help you make an informed decision about whether to acquire the financial product.

### WORKING WITH A FINANCIAL ADVISER

As your adviser, we are required by law to act in your best interests.

Your adviser will ask you to provide accurate information about yourself and will need to be informed of any changes in your situation to ensure that the advice provided is and remains suitable to your personal circumstances.

You have the right not to divulge information about yourself. However, the appropriateness of the advice you receive may be impacted if we do not fully understand your situation.

In compliance with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act), we will need to verify your identity before providing any financial product advice and services to you. Your adviser will let you know which identification documents can be presented for identification purposes.

## FINANCIAL SERVICES WE CAN PROVIDE

We can provide advice on, and deal in the following financial products as authorised representatives of AIIG:

- Deposit products;
- Securities (including shares);
- Life Insurance Risk Products;
- Life Insurance Investment Products (including investment bonds);
- Managed Investments Schemes (e.g., Separately Managed Accounts);
- Investor Directed Portfolio Services;
- Retirement Savings Accounts; and
- Superannuation.

We cannot provide advice in respect of any facility where your adviser can change your portfolio before obtaining your consent (commonly known as Managed Discretionary Accounts).

We will only provide services to you with your prior, informed consent. If you do not understand any of the information in this FSG or have any other questions relating to the terms on which we will be acting, please contact us.

When advising you, other matters may arise that we are not authorised to assist with. We are only authorised to assist with a financial service or financial product set out above.

## REMUNERATION AND BENEFITS

### REMUNERATION

The fees for services provided by us depend on the nature of those services. Full details on the remuneration and other benefits we receive are detailed in the Adviser Profile attached to this FSG. Any fees will be agreed with you before the service is provided. Fees we may charge are:

- Initial meeting fee
- Initial Advice fee
- Implementation fee
- Ongoing advice service fee
- Ad-hoc advice fee
- Consult fee (time based)

The fees charged for our advice and services may be a fixed dollar amount, or a percentage(asset)-based fee. For more detail, see the Remuneration Schedule attached to your Adviser's profile.

We may also receive commissions paid by product providers. Your adviser may choose to rebate commissions received to you, or to offset them against other fees payable.

All fees or commissions are initially paid to AIIG who then remit 100% to us after deducting the licensee fees.

## OTHER BENEFITS

From time to time, we may accept alternative forms of remuneration from product providers or other parties, such as hospitality or support connected with our professional development (e.g., training or sponsorship to attend conferences). We maintain a register detailing any benefit we receive which is valued at between \$100 and \$300, and other benefits that relate to information technology, software or support provided by a product issuer, or that relate to the educational and training purposes. A copy of the register is available on request.

With your permission you may be referred to an external specialist to receive further advice. We will not receive a referral fee or commission for introducing you to any specialist.

Neither AIIG nor its authorised representatives/employees endorse products or services provided by external providers.

## RELATIONSHIPS AND ASSOCIATIONS

Australian Investment & Insurance Group Pty Ltd is a wholly owned subsidiary of Amalgamated Australian Investment Group Ltd, a diversified group of financial services companies which includes:

- Australian Stock Report Pty Ltd;
- APSEC Funds Management Pty Ltd;
- APSEC Compliance and Administration Pty Ltd;
- HC Securities Pty Ltd;
- Infinity Financial Advice Pty Ltd
- Ascot Securities Pty Ltd;
- Atlantic Pacific Securities Pty Ltd; and
- Amalgamated Australian Investment Solutions Pty Limited

If we recommend a product that is issued by our Licensee or one of its related companies, the Licensee or its parent company may benefit from the recommendation by receiving product or administration fees. Any such fees will be disclosed in the relevant PDS and the SOA.

We are generally only permitted to recommend products on the Approved Products List (APL), which the Licensee approves. The Licensee is a fully owned subsidiary of Amalgamated Australian Investment Group Ltd, which issues some of the products on the APL. We may consider products which are not listed on our APL if it is required to meet our best interest duty obligations having regard to your objectives, financial situation and needs.

The Licensee has negotiated agreements with IOOF Investment Management Limited (IIIML) and HUB24 Custodial Services Ltd (HUB24) so that the Licensee and its advisers can offer clients discounted rates, premiums and/or other product fees for various financial products provided by the relevant product issuer. We do not receive any additional benefit (whether monetary or non-monetary) from the product issuers by virtue of such arrangements, but the discount may influence the financial product that we recommend to you. If we recommend a product that is discounted by virtue of such an arrangement, the discount, and any conditions, for example that you stay with the Licensee to retain the discounted rate, will be disclosed in the SOA.

## COMPENSATION ARRANGEMENTS

We have arrangements in place to maintain adequate professional indemnity insurance as required by s912B of the Corporation's Act. This insurance provides cover for claims made against us and our representatives, including claims in relation to the conduct of representatives who no longer work for us but who did so at the time of the relevant conduct.

## WHAT SHOULD YOU DO IF YOU HAVE A COMPLAINT?

Should you have any complaints about the services provided to you by your adviser, we invite you to take the following steps:

Contact your adviser directly or AIIG's complaints officer to discuss your complaint:

Complaints Officer  
Australian Investment & Insurance Group Pty Ltd  
Level 4, 10 Barrack Street  
Sydney, NSW, 2000  
T: (02) 8015 3762  
E: [compliance@aaigl.com.au](mailto:compliance@aaigl.com.au)

We will acknowledge receipt of your complaint as soon as practicable. We will then investigate the complaint and provide a response within 30 days of receipt of complaint.

If your complaint has not been satisfactorily resolved, you may take your complaint to the Australian Financial Complaints Authority (AFCA), an External Dispute Resolution Scheme. AFCA provides a fair and independent financial services complaint resolution that is free to consumers.

Australian Financial Complaints Authority (AFCA)  
GPO Box 3 Melbourne VIC 3001  
T: 1800 931 678 F: (03) 9613 6399  
E: [info@afca.org.au](mailto:info@afca.org.au) W: [www.afca.org.au](http://www.afca.org.au)  
The Australian Securities and Investments Commission (ASIC) may be contacted on 1300 300 630 to assist you in settling your complaint.



## ADVISER PROFILE

### MARK TYMINSKI

**Mark Tyminski** is an Authorised Representative (No. 307441) of Australian Investment & Insurance Group Pty Ltd (AFSL No. 226405).

### EXPERIENCE

Mark Tyminski has over 25 years' financial services industry experience gained through working with both boutique financial planning firms and large corporate institutions.

He has also worked as a Practice Development Manager and having been instrumental in assisting practices with development and upgrades to their financial planning systems and has sat on several committees regarding software development.

Mark is an accomplished presenter, having spoken at various conferences throughout his career including –

- NAB's first "Financial Planning for Women" seminar
- The Australian Institute of Architects
- The Bridges national conferences on the efficient use of software systems in financial planning practices.
- The Police Association of South Australia (PASA) on pre-retirement planning.

### QUALIFICATIONS

- FASEA Financial Adviser Exam (Pass)
- SMSF Specialist Adviser®, SMSF Association
- Professional Certificate in SMSF's (Adelaide University)
- Diploma of Financial Planning (FPA)
- Certificate Course, Securities Institute of Australia

### ADVICE AND SERVICES OFFERED

- Tax-effective investment strategies
- Superannuation strategies, including SMSF advice
- Pre- and Post-Retirement planning
- Centrelink entitlements
- Salary packaging
- Personal insurance (life, TPD, critical illness/trauma, income protection, business expenses)
- Estate planning (general considerations only)
- Aged care advice

**Mark Tyminski** is a registered tax (financial) adviser under the Tax Agents Services Act 2009.

If the receiver of the advice intends to rely on the advice to satisfy liabilities or obligations or claim entitlements that arise, or could arise, under a taxation law, the receiver should request advice from a registered Tax Agent or a registered Tax (Financial) Adviser.

### PRODUCT ARRANGEMENTS

I have not entered into any financial or other incentive arrangements with any product providers.

### REMUNERATION AND BENEFITS

The fees for services provided depend on the nature of those services. Usually, the fees for services provided will be in the following range:

<b>Fee / Service</b>	<b>Range (AUD inc. GST)</b>
Initial consultation meeting	\$0 - \$1,100
Planning fees (including Statement of Advice)	\$2,200 - \$6,600
Implementation fee	\$0 - \$1,100
Ongoing service fee	\$1,100 - \$4,400 p.a.
Ad-hoc financial advice	\$363 p/hr. (part thereof)
Centrelink administration & support	\$440 - \$1,100 p.a.

<b>Insurance Commission*</b>	<b>Range (AUD inc. GST)</b>
Upfront Commission on Life Insurance Products	0% - 66% of first year premium paid
Ongoing Commission on Life Insurance Products	0% - 33% of ongoing premium paid

\*Note: commission claw backs may arise if policies are cancelled within 24 months.

All fees or commissions are initially paid to AIIG who then remit 100% to Ellastone Financial Planning after deducting the licensee fees.

# PRIVACY POLICY

MARK TYMINSKI

Dated 21 February 2022

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## The Privacy Policy forms part of the Financial Services Guide.

Elastone Financial Planning (referred to as we, our, us) is bound by the Privacy Act 1988 (Privacy Act), including the Australian Privacy Principles (APPs) and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by us must abide by this Privacy Policy and Collection Statement (Privacy Policy).

## WHAT TYPES OF PERSONAL INFORMATION ABOUT ME DOES ELLASTONE FINANCIAL PLANNING AND ITS AUTHORISED REPRESENTATIVES HOLD?

We collect and hold personal information about you that is both relevant and necessary for us to provide you with financial advice and services.

We may collect and hold a range of personal information about you, to enable us to provide you with our services and may include the following information:

- name; address; phone numbers; email addresses;
- occupation; bank account details;
- driver's licence details;
- financial information, including details of:
  - i) your investments;
  - i) your insurance policies;
  - ii) estate planning strategies;
  - iii) taxation information;
- health information; and
- lifestyle information

## HOW DOES ELLASTONE FINANCIAL PLANNING COLLECT PERSONAL INFORMATION?

We generally collect personal information directly from you. For example, personal information will be collected through our application processes, forms, and other interactions with you while providing you with our products and services,

including when you call us or send us correspondence.

We may also collect personal information about you from a third party, such as electronic verification services, referrers, marketing agencies, or credit providers. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy.

We will not collect sensitive information about you without your consent unless an exemption in the APPs applies. These exceptions include if the collection is required or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If the personal information we request is not provided by you, we may not be able to provide you with the benefit of our services or meet your needs appropriately.

We do not give you the option of dealing with them anonymously, or under a pseudonym. This is because it is impractical, and, in some circumstances, illegal for us to deal with individuals who are not identified.

## UNSOLICITED PERSONAL INFORMATION

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

## WHO DO WE COLLECT PERSONAL INFORMATION ABOUT?

The personal information we may collect, and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- service providers or suppliers;
- prospective employees, employees, and contractors; and
- other third parties with whom we come into contact.

## WEBSITE COLLECTION

We collect personal information from our website when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. You can view and access our Privacy Policy by clicking on the privacy button on our website.

## WHY DO WE COLLECT AND HOLD PERSONAL INFORMATION?

We may use and disclose the information we collect about you for the following purposes:

- provide you with our products and services, (including financial planning, wealth management, and insurance services);
- review and meet your ongoing needs;
- provide you with information we believe may be relevant or of interest to you;
- let you know about other products or services we offer, send you information about special offers or invite you to events;
- consider any concerns or complaints you may have;
- comply with relevant laws, regulations and other legal obligations;
- help us improve the products and services offered to our customers and enhance our overall business;
- to assist in providing wealth management, financial planning, personal risk, and stockbroking services.
- Facilitating referral arrangements between entities.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

## WHO MIGHT ELLASTONE FINANCIAL PLANNING DISCLOSE MY PERSONAL INFORMATION TO?

We may disclose personal information to:

- a related entity of Ellastone Financial Planning;
- a related entity of AIIG;
- to another financial adviser within AIIG;
- to another Australian Financial Services Licensee;
- an agent, contractor, or service provider we engage to carry out our functions and activities, such as our lawyers, accountants, platform providers, storage and emailing services debt collectors or other advisers;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;

- regulatory bodies, government agencies, law enforcement bodies and courts;
- financial product issuers and credit providers;
- other professionals, joint account holders, client agents and
- anyone else to whom you authorise us to disclose it or is required by law.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

If we need to appoint another financial adviser to manage your financial needs and services, you will be advised of any change to your financial adviser in writing.

## HOW DOES ELLASTONE FINANCIAL PLANNING MANAGE MY PERSONAL INFORMATION?

We recognise the importance of securing the personal information of our customers.

We take reasonable steps to protect your information from misuse, interference, and loss, and from unauthorised access, modification, or disclosure. We will hold your personal information for 7 years after you stop using our services and will then take reasonable steps to securely destroy the information, or to ensure the information is de-identified.

## SENDING INFORMATION OVERSEAS

We may engage service providers located in countries outside Australia including but not limited to the Philippines to assist in providing products or services. Disclosure of personal information to overseas providers may be required and will not be used for marketing purposes. We do not sell client details and we will not disclose your details to an external third party without your consent.

We will not send personal information to recipients outside of Australia unless:

- we have taken reasonable steps to ensure that the recipient does not breach the Privacy Act and the APPs;
- the recipient is subject to an information privacy scheme similar to the Privacy Act; or
- the individual has consented to the disclosure.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act.

## MANAGEMENT OF PERSONAL INFORMATION

We recognise the importance of securing the personal information of our customers. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification, or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system and passwords are routinely checked; and
- all computers which contain personal information are secured both physically and electronically.

Where we work remotely or from home, we implement the following additional security measures:

- employees are not permitted to work in public places;
- employees store devices in a safe location when not in use; and
- employees may not disclose an individual's personal information to colleagues or third parties, via personal chat groups.

## DIRECT MARKETING

We may only use personal information we collect from you for the purposes of direct marketing without your consent if:

- the personal information does not include sensitive information; and
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing; and
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented (or it is impracticable to obtain your consent), and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period.

If you would like to "opt out" of having your information used for direct marketing purposes, please email us with the subject "Unsubscribe" and include the following information: name of company you received the communication from, full name and email address.

## IDENTIFIERS

We do not adopt identifiers assigned by the Government (such as drivers' licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

## HOW DO WE KEEP YOUR PERSONAL INFORMATION ACCURATE AND UP TO DATE?

We are committed to ensuring that the personal information we collect, use, and disclose is relevant, accurate, complete, and up to date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, we will notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

## HOW DO I GET ACCESS TO THE PERSONAL INFORMATION ELLASTONE FINANCIAL PLANNING HOLDS ABOUT ME?

You may request access to the information we hold about you by contacting your authorised representative or Australian Investment & Insurance Group directly. Upon receipt of your request we will endeavour to service your request as quickly as possible within 30 days.

We will require identity verification and specification of what information is required. In some circumstances access to your information or parts thereof may not be possible. If this is the case, we will inform you as to why and, where practicable, make alternative arrangements. Depending on the requirements an administrative fee for search and photocopying costs may be charged to service requests.

## UPDATES TO THE PRIVACY POLICY

This Privacy Policy will be reviewed from time to time to take account of new laws and technology, and changes to our operations and the business environment.

## REPORTING YOUR CONCERNS

We have an effective complaint handling process in place to manage privacy risks and issues.

The complaints handling process involves:

- identifying (and addressing) any systemic/ongoing compliance problems;
- increasing consumer confidence in our privacy procedures; and
- helping to build and preserve our reputation and business.

You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer. If you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with us by:

Contacting your adviser or Australian Investment & Insurance Pty Ltd to discuss your concerns or complaint:

### Privacy Officer

Australian Investment & Insurance Group Pty Ltd  
215 Grenfell Street, Adelaide SA 5000  
T: (08) 8338 5155  
E: [info@aiiq.com.au](mailto:info@aiiq.com.au)

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner:

### Director of Complaints

Office of the Australian Information Commissioner  
GPO Box 5218 Sydney NSW 2001  
T: 1300 363 992  
E: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) W: [www.oaic.gov.au](http://www.oaic.gov.au)

## CONTRACTUAL ARRANGEMENTS WITH THIRD PARTIES

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;
- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

## YOUR RIGHTS

This Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information;
- you may ask us to provide an alternative means of identity verification for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth);
- you may complain about a breach of the Privacy Act, including the APPs; and
- we will deal with a privacy complaint.