



# Aviso Integral

Insurance Services

An Aviso Group Partner

## Financial Services Guide

The financial services referred to in this financial services guide (FSG) are offered by:

**O'Donohue Nominees Pty Ltd trading as Aviso Integral Insurance Services (ABN 28 005 729 831) (AFSL 23991) (Aviso Integral)**

77 Gellibrand Street, Colac VIC 3250  
Phone: 03 5231 3088

16 Pakington Street, Geelong West VIC 3218  
Phone 03 5244 1129

Email: [info@avisointegral.com.au](mailto:info@avisointegral.com.au) Web: <https://avisointegral.com.au/>

### Lack of Independence

We are not independent, impartial, or unbiased because we or our representatives or associates may receive remuneration or other gifts or benefit from:

- the issuer of the product you buy (e.g., commission that we retain); or
- other third parties for related services provided in connection with the personal advice service (e.g. premium funding, claims or loss adjusting or reinsurance services), which may reasonably be expected to influence the personal advice provided to you.
- we or our representatives may be subject to direct or indirect restrictions relating to the financial products in respect of which personal advice is provided; and
- we or our representatives or associates have associations or relationships with issuers of financial products and others that might reasonably be expected to influence the personal advice provided to you.

We explain such arrangements in more detail in this document and you can ask us for more detail.

However, it is important to note that when providing personal advice, we are required under the Corporations Act to always act in our client's best interests. We also have policies and procedures for the proper management of conflicts of interests. You can ask us for more detail.

**This FSG sets out the services that we can offer you. It is designed to assist you in deciding whether to use any of those services and contains important information about:**

- the services we offer you.
- how we and others are paid.
- any potential conflict of interest we may have.
- our internal and external dispute resolution procedures and how you can access them.
- arrangements we have in place to compensate clients for losses.

## Further information when personal advice is given

We will provide you with further information whenever we provide you with advice which takes into account your objectives, financial situation and needs.

This information may include the advice that we have given you, the basis of the advice and other information on our remuneration and any relevant associations or interests. This information may be contained in a Statement of Advice (**SOA**) or Important Information Statement.

When you ask us to recommend an insurance policy for you, we will usually only consider the policies offered by the insurers or insurance providers that we deal with regularly. In giving you advice about the costs and terms of recommended policies we have not compared those policies to other policies available, other than from those insurers we deal with regularly.

## Product disclosure statement

If we offer to arrange the issue of an insurance policy to you, we will also provide you with, or pass on to you, a product disclosure statement (**PDS**), unless you already have an up to date PDS. The PDS will contain information about the particular policy which will enable you to make an informed decision about purchasing that product.

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<b>From when does this FSG apply?</b>	This FSG applies from 26 <sup>th</sup> September 2022 and remains valid unless a further FSG is issued to replace it. We may give you a supplementary FSG. It will not replace this FSG but will cover services not covered by this FSG.
<b>How can I instruct you?</b>	You can contact us to give us instructions by post, phone, or email on the contact number or details mentioned on page 1 of this FSG.
<b>Who is responsible for the financial services provided?</b>	<p>Aviso Integral is responsible for the financial services that will be provided to you or through you to your family members, including the distribution of this FSG.</p> <p>Aviso Integral holds a current Australian Financial Services Licence (no. 239911). The contact details Aviso Integral are on the top of this FSG.</p>
<b>What kinds of financial services are you authorised to provide to me and what kinds of financial product/s do those services relate to?</b>	Aviso Integral is authorised to issue, advise and deal in general insurance products to wholesale and/or retail clients. We will do this for you as your broker unless we tell you otherwise.
<b>Will I receive tailored advice?</b>	<p>Not in all cases. However, we may need information about your personal objectives, details of your current financial situation and any relevant information, so that we can arrange insurance policies for you, or issue insurance policies to you or to give you advice about your insurance needs. We will ask you for the details that we need to know.</p> <p>In some cases, we will not ask for any of this information. If we do not ask, or if you do not give us all the information we ask for, any advice you receive may not be appropriate to your needs, objectives and financial situation.</p> <p>You should read the warnings contained in any SOA, or any other warnings that we give you, carefully before making any decision about an insurance policy.</p> <p>Where we provide you with advice about your insurance arrangements, that advice is current at the time that we give it. We will review your insurance arrangements when you inform us about changes in your circumstances.</p>

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**Contractual Liability and your insurance cover**

Many commercial or business contracts contain clauses dealing with your liability (including indemnities or hold harmless clauses). Such clauses may entitle your insurers to reduce cover, or in some cases, refuse to indemnify you at all. You should seek legal advice before signing and accepting contracts. You should inform us of any clauses of this nature before you enter into them.

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**What information do you maintain in my file and can I examine my file?**

We maintain a record of your personal profile, including details of insurance policies that we arrange or issue for you. We may also maintain records of any recommendations or advice given to you. We will retain this FSG and any other FSG given to you as well as any SOA or PDS that we give or pass on to you for the period required by law.

We are committed to implementing and promoting a privacy policy, which will ensure the privacy and security of your personal information. A copy of our privacy policy is available on request. A copy is also available on our website [www.AvisoIntegral.com.au](http://www.AvisoIntegral.com.au)

If you wish to look at your file, please ask us. We will make arrangements for you to do so.

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**How will I pay for the services provided?**

For each insurance product the insurer will charge a premium that includes any relevant taxes, charges and levies. We often receive a payment based on a percentage of this premium (excluding relevant taxes, charges and levies) called commission, which is paid to us by the insurers. However, we will also charge you a fee. These will all be shown on the invoice that we send you. You can choose to pay by any of the payment methods set out in the invoice. You are required to pay us within the time set out on the invoice.

If there is a refund or reduction of your premium as a result of a cancellation or alteration to a policy or based on a term of your policy (such as a premium adjustment provision), we will retain any fee we have charged you. We will also retain commission depending on our arrangements with the insurer or charge you a cancellation fee equal to the reduction in our commission.

When you pay us your premium it will be banked into our trust account. We retain the commission from the premium you pay us and remit the balance to the insurer in accordance with our arrangements with the insurer. We will earn interest on the premium while it is in our trust account, or we may invest the premium and earn a return. We will retain any interest or return on investment earned on the premium.

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**Electronic Delivery of Disclosure Notices**

Please note that where possible we prefer to provide all correspondence and disclosure notices (including Financial Services Guides and Product Disclosure Statements) to you electronically, via email or links to websites etc. If you have provided your email address to Us, we will typically use that email address for all correspondence and disclosure notices. Should you not wish to be sent disclosure documents electronically please advise us and we will update our records accordingly.

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**How are any commissions, fees or other benefits calculated for providing the financial services?**

Unless we tell you otherwise, we are remunerated by commission from the relevant insurer whenever you enter into an insurance policy arranged by us (including renewal and some variations). The commission is calculated as a percentage (ranging from 0% to 30%) of the insurer's base premium ( i.e. premium excluding stamp duty, fire services levy, GST or any other government taxes, fees or levies)

We may also charge you a Broker Fee.

We may also receive other income or benefits from insurers, including commission or allowances, from insurers for managing binding authorities or other similar facilities and profit commissions or profit shares on certain classes of insurance. In some instances this remuneration is only paid to us if the portfolio is more profitable than the insurer would normally expect from this type of business. The percentage of profit payable may vary and is not guaranteed.

We do not often pay any commission, fees or benefits to others who refer you to us. If we do, we will pay commissions to those people out of our commission or fees (not in addition to these amounts).

Our employees that will assist you with your insurance needs will be paid a market salary and may include bonuses based on our performance criteria.

If we give you personal advice, we will inform you of any fees, commission, or other payments we, our associates or anyone referring you to us (or us to any insurer) will receive in relation to the policies that are the subject of the advice.

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**Do you have any relationships or associations with the insurers who issue the insurance policies or any other material relationships?**

Aviso Integral may enter into agreements with a limited number of insurers or premium funders under which we may receive fees or other remuneration, such as profit share for the retention or growth of various insurance portfolios. The remuneration we may receive from these agreements is variable, and is based on factors such as business retention, the volume of products or funding contracts arranged or the profitability of the portfolio of products arranged. Any commissions which may be payable are variable and are not guaranteed. If you have any questions, please ask us

**Invest**

Invest Pty Ltd (**Invest**) is a group of related financial services businesses. The businesses operated in the group include insurance broking, underwriting agencies (on behalf of local and overseas insurers), and claims administration. These businesses operate separately from the Aviso Integral business although they are related companies.

We will inform you if your insurances are placed through one of these entities or we recommend or engage any of these entities to provide services to you. We refer you to the Invest website for further details on all related companies at <https://invest.com.au/>

### **Aviso Group**

Aviso Integral is a member of the Aviso Group Pty Ltd (**Aviso Group**), which is the owner of the Aviso Group trademarks and intellectual property. Aviso has granted Aviso Brokers a licence to use the Aviso Group trademarks and its intellectual property. Aviso Group has arrangements with some insurers and premium funders (**Partners**) under which Aviso Group may receive between 0.5% – 1.5% commission and/or profit incentives for each product arranged by us with those Partners. We may receive a proportion of that commission from Aviso Group at the end of each financial year (or other agreed period).

### **Steadfast**

Aviso Integral is a Steadfast Group Limited (**Steadfast**) Network Broker. Steadfast has exclusive arrangements with some insurers and premium funders (**Partners**) under which Steadfast will receive between 0.5% to 1.5% commission for each product arranged by us with those Partners. Steadfast is also a shareholder of some Partners.

As a Steadfast Network Broker, we have access to member services including model operating and compliance tools, procedures, manuals and training, legal, technical, banking and recruitment advice and assistance, group insurance arrangements, product comparison and placement support, claims support and group purchasing arrangements. These member services are either funded by Steadfast, subsidised by Steadfast or available exclusively to Steadfast Network Brokers for a fee.

You can obtain a copy of Steadfast's FSG at <https://steadfast.com.au/>

### **Premium Funding**

If we arrange premium funding for you, we may be paid a commission by the premium funder. We may also charge you a fee (or both). The commission that we are paid by the premium funder is usually calculated as a percentage of your insurance premium (including government fees or changes). If you instruct us to arrange or issue a product, this is when we become entitled to the commission.

Our commission rates for premium funding are in the range of 0% to 6% of funded premium. When we arrange premium funding for you, you can ask us what commission rates we are paid for that funding arrangement compared to the other arrangements that were available to you. The amount of our commission and any fee that we charge will set out in the premium funding contract.

### **Relationships**

We may recommend the services of another financial adviser that can provide services we are not licensed to provide. This financial adviser may be an associated business where we hold financial interests. We will tell you at the time the referral is provided if we have a relationship with the other financial adviser.

**What should I do if I have a complaint?**

1. Contact us and tell us about your complaint. We will do our best to resolve it quickly.
2. If your complaint is not satisfactorily resolved within 20 days, please contact our complaints officer on 03 5231 3088 or put your complaint in writing and send it to the address noted at the beginning of this FSG. We will try and resolve your complaint quickly and fairly.
3. Aviso Integral is a member of the Australian Financial Complaints Authority (**AFCA**). If your complaint cannot be resolved to your satisfaction by us, you have the right to refer the matter to the AFCA. AFCA provides fair and independent financial services complaint resolution that is free to customers. The AFCA can be contacted at:

*Mailing address:*

Australian Financial Complaints Authority, GPO Box 3, Melbourne, VIC 3001

Ph – 1800 931 678

Email – [info@afca.org.au](mailto:info@afca.org.au)

Website - [www.afca.org.au](http://www.afca.org.au)

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**What arrangements do you have in place to compensate clients for losses?**

Aviso Integral has a professional indemnity insurance policy (**PI policy**) in place.

The PI policy covers us and our representatives (including our authorised representatives) for claims made against us and our representatives by clients as a result of the conduct of us, our employees or representatives in the provision of financial services

Our PI policy covers us for claims relating to the conduct of representatives who no longer work for us.

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**Any questions?**

If you have any further questions about the financial services Aviso Integral provides, please contact us.

Please retain this document for your reference and any future dealings with Aviso Integral.

# Privacy Policy

O'Donohue Nominees Pty Ltd trading as Aviso Integral Insurance Services (ABN 28 005 729 831), are committed to protecting your privacy and confidentiality in accordance with the Privacy Act 1988 (Cth) (Privacy Act) and to the extent applicable, the EU General Data Protection Regulations. It is one of our prime concerns that any personal or sensitive information you provide to us is not used for any other purpose than that intended and expected by you. This Privacy Policy describes our current policies and practices in relation to the collection, handling use and disclosure of personal information.

## What information do we collect, hold and how do we use it?

We will collect personal information for primary purposes, which are relevant to providing and administering our financial products and services. Personal Information we hold which is identifiable as being about you. This can include a broad range of information such as your name, email address, contact details, age, and any other information about your personal affairs. We provide any information that the insurers or intermediaries who we ask to quote for your insurances and premium funding require to enable them to decide whether to insure you and on what terms or to fund your premium and on what terms.

Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia. For example, if we seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to the insurer. If this is likely to happen, we inform you of where the insurer is located, if it is possible to do so.

When a claim is made under an insurance policy, to enable us to assist in the claim process, we and our representatives and those of the insurer (including loss adjusters, investigators, medical advisers and lawyers) collect information about the claim, some of which may be personal information. We may collect the information from you or from third parties.

We provide this information to the insurer and or their agents and those appointed to assist you in making a claim. Again, this information may be passed on to your underwriters and reinsurers. We may use your personal information internally to help us improve our services and help resolve any problems.

From time to time, we will use your contact details to send you direct marketing communications including offers, updates and newsletters that are relevant to the services we provide. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you.

## What if you don't provide some information to us?

We can only apply for and arrange financial service products if we have all relevant information. The insurance laws also require insureds to provide all the information required by your insurer to help them decide whether to insure you and on what terms. Credit Providers also require specific information to help them assess any credit applications that we may facilitate on your behalf.

## How do we hold and protect your information?

We strive to maintain the reliability, accuracy, completeness, and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you initially in a working file, which when completed is electronically imaged and stored, after which any paper is destroyed in our onsite shredder. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the Privacy Act.

We ensure that your information is safe by protecting it from unauthorised access, modification, and disclosure. We maintain physical security over our paper and electronic data and premises, by using locks and security systems. We also maintain computer and network security; for example, we use firewalls (security measures for the Internet) and

other security systems such as user identifiers and passwords to control access to computer systems where your information is stored.

### **Will we disclose the information we collect to anyone?**

We may disclose information to:

- Financial institutions, other Australian Financial Service Licensees, Insurers, underwriters, underwriting agencies, wholesale brokers and reinsurers (for the purpose of seeking recovery from them or to assist them to assess insurance risks);
- Premium funders / Credit providers for the purposes of gaining quotations on and arranging funding of your insurance premiums.
- An investigator, assessor, State or Federal Health Authorities, lawyers, accountants, medical practitioners, hospitals or other professional advisors (for the purposes of investigating or assessing your claim);
- A lawyer or recovery agent (for the purpose of defending an action by a third party against you or for the purpose of recovery costs including your excess);
- Contractors who supply services to us, e.g. to handle mailings on our behalf.
- An immediate family member;
- Other companies in the event of a corporate sale, merger, reorganisation, dissolution or similar event

However, we will do our best to ensure that they protect the information in the same way that we do. We may provide this information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits. We do not sell, trade, or rent personal information to others.

### **How can you Access, check, update or change your information?**

Upon receipt of your written request from you and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate. If you wish to access or correct your personal information please write to the Privacy Officer, C/- 77 Gellibrand Street Colac, VIC 3250

We do not charge for receiving a request for access to personal information or for complying with a correction request. We do however reserve the right to charge you for all reasonable costs and outgoings specifically incurred in meeting your request for information.

### **Your consent**

By asking us to provide you with our financial services, you consent to the collection and use of the information you have provided to us for the purposes described above.

### **Complaints about Privacy**

Should you have a query or a complaint regarding a breach of privacy please contact our Privacy Officer who will handle the matter in accordance with our formal complaints handling procedures.

Your complaint can be lodged over the phone 03 5231 3088, via mail PO Box 123 Colac, VIC 3250 or email [info@avisointegral.com.au](mailto:info@avisointegral.com.au) or you may wish to make an appointment with our Privacy Officer at a convenient time and location. We will do all that is reasonable in the circumstances to address your complaint.

The OAIC can investigate privacy complaints from individuals about our business if we are specifically caught by the Privacy Act. We also follow the Notifiable Data Breach obligations imposed by the Privacy Act.

Before a client can lodge a complaint with the OAIC, they will generally need to complain directly to ourselves and allow 30 days for it to respond. If they do not receive a response within 30 days, or they are dissatisfied with our response, they may then complain to the OAIC.

Complaints to the OAIC must be made in writing. Further information on the complaints process is available for clients wishing to complain regarding a Privacy Breach at [www.oaic.gov.au](http://www.oaic.gov.au)



## Information sent overseas

In certain situations, it is likely that some or all of the Personal Information that you provide to us may be disclosed to businesses that operate overseas. This would only occur where the product provider / intermediary is based overseas – e.g. Lloyds of London syndicates or brokers and other overseas based insurers and intermediaries or in situations where we utilise “Cloud Computing” services that are situated outside Australia.

In all such cases, unless we expressly inform you and obtain your consent to the contrary, we commit to making reasonable enquiries to ensure that these organisations comply with their local privacy legislation where such legislation is comparable to the Australian legislation and to comply with the key components of Australian Privacy legislation in cases where their local legislation is considered inadequate or non-existent.

## Website Privacy Issues

### Anonymous data

We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider may log your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

### Cookies

In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

### Forms

Our Website may allow visitors to submit information via Self-Service forms (Quotes, Claim Forms, Employment and Contact request). The information submitted via the Forms may not be encrypted. Should you be concerned about the confidentiality of any information provided by any Self-Service forms please do not hesitate to lodge this information with us via phone or email.

We may also use your contact information that you supply on this website to send you requested product information and promotional material and to enable us to manage your ongoing requirements, e.g. renewals, and our relationship with you, e.g. invoicing, client surveys etc.

We may also notify you via direct marketing about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post on insurance matters. If you would rather not receive this information or do not wish to receive it electronically, email or write to us.

We may also use your information internally to help us improve our services and help resolve any problems.

## General Data Protection Regulation (GDPR) for the European Union (EU)

We will comply with the principles of data protection set out in the GDPR for the purpose of fairness, transparency and lawful data collection and use.

We process your personal information as a Processor and/or to the extent that we are a Controller as defined in the GDPR.

We must establish a lawful basis for processing your personal information. The legal basis for which we collect your personal information depends on the data that we collect and how we use it.

We will only collect your personal information with your express consent for a specific purpose and any data collected will be to the extent necessary and not excessive for its purposes. We will keep your data safe and secure.

We will also process your Personal Information if it is necessary for our legitimate interests, or to fulfill a contractual or legal obligation.

We process your personal information if it is necessary to protect your life or in a medical situation, it is necessary to carry out a public function, a task of public interest or if the function has a clear basis in law.

We do not collect or process any personal information from you that is considered “Sensitive Personal Information” relating to your sexual orientation or ethnic origin unless we have your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

You must not provide us with your personal information if you are under the age of sixteen without the consent of your parent or someone who has parental authority for you. We do not knowingly collect or process the personal information of children.

### **Your rights under the GDPR**

If you are an individual residing in the EU, you have certain rights as to how your personal information is obtained and used. We comply with your rights under the GDPR as to how your personal information is used and controlled if you are an individual residing in the EU.

Except as otherwise provided in the GDPR, you have the following rights:

- To be informed how your personal information is being used;
- Access your personal information (we will provide you a free copy of it);
- To correct your personal information if it is inaccurate or incomplete;
- To delete your personal information (also known as the “right to be forgotten”);
- To restrict processing of your personal information;
- To retain and reuse your personal information for your own purposes.
- To object to your personal information being used; and
- To object against automated decision making and profiling.

Please contact our Complaints Officer at any time to exercise your rights under the GDPR. We may ask you to verify your identity before acting on your requests.

### **Disclaimer**

Although we intend to observe this policy at all times, you should note that the Privacy Act does not apply to small businesses. It only applies to businesses with an annual turnover of \$3M or more per annum. Therefore, should we be in a position where the Privacy Act does not legally apply to us we may decide it is necessary or desirable to act outside this Policy. We may do so, subject only to any legal obligations we have to you or under any law, including the Privacy Act.