

Privacy Policy

Last Updated: July 2026

1. Introduction

DeeTwo Consulting ("DeeTwo", "we", "our" or "us") is committed to protecting the privacy and security of personal information. This Privacy Policy explains how we collect, hold, use, disclose and protect personal information in accordance with the Privacy Act 1988 (Cth), including the Australian Privacy Principles (APPs).

As an outsourced paraplanning and consulting provider to financial advisers and advice practices, we may process personal information relating to clients of those advisers for the purpose of providing paraplanning, strategy, compliance and related support services.

2. Who We Collect Information About

We may collect personal information about:

- Financial advisers and advice practices;
- Clients and prospective clients of adviser firms;
- Business contacts and suppliers;
- Job applicants, contractors and subcontractors;
- Users of our website.

3. Types of Personal Information We Collect

Certain personal information we collect may constitute sensitive information under applicable privacy laws, including information relating to insurance, health, financial circumstances or identity verification. We will only collect, use and disclose such information where reasonably necessary for providing our services or as otherwise permitted or required by law.

Depending on the services provided, we may collect:

- Full name;
- Contact details (address, email, telephone number);
- Date of birth;
- Financial information;
- Superannuation information;
- Insurance information;
- Investment and asset information;
- Liabilities and debt information;
- Employment and income details;

- Tax-related information;
- Family and beneficiary information;
- Identification and verification information;
- Adviser and practice information;
- Website usage and technical information.

We only collect information reasonably necessary for our business activities and service delivery.

4. How We Collect Personal Information

We may collect personal information:

- Directly from you;
- Through financial advisers or advice practices that engage our services;
- Through client fact-finds and supporting documentation;
- Through email, telephone and online communication;
- Through meetings and consultations;
- Through our website and online forms;
- From third-party service providers where authorised.

Where personal information is provided to us by a financial adviser or advice practice, the adviser or practice is responsible for obtaining any necessary consents, providing required privacy notifications, and ensuring that the disclosure of personal information to DeeTwo Consulting is authorised and lawful. In most cases, DeeTwo Consulting processes personal information on behalf of financial advisers and advice practices for the purpose of delivering paraplanning, consulting, compliance and related support services. We will use and protect such information in accordance with this Privacy Policy and applicable privacy laws.

5. Purpose of Collection and Use

We use personal information for purposes including:

- Preparing Statements of Advice and advice documentation;
- Providing paraplanning services;
- Strategy modelling and research;
- Compliance and quality assurance activities;
- Communicating with clients and adviser firms;
- Managing business relationships;
- Recruitment and contractor management;
- Website administration and improvement;
- Meeting legal and regulatory obligations.

We will not use personal information for purposes unrelated to those described above unless permitted or required by law.

6. Disclosure of Personal Information

We may disclose personal information to:

- Employees and authorised personnel;
- Contract paraplanners and subcontractors;
- Financial advisers and advice practices;
- Professional advisers including accountants, auditors and lawyers;
- Software and technology providers;
- Cloud storage providers;
- Regulatory authorities where required by law;
- Other parties with consent or where legally permitted.

All personnel and subcontractors with access to personal information are required to comply with confidentiality and privacy obligations.

7. Third-Party Software and Systems

To provide our services, we may use third-party platforms including, but not limited to:

- Xplan;
- AdviserLogic;
- Midwinter;
- Interfolio
- Plutosoft
- Microsoft 365 Enterprise and OneDrive Enterprise;
- Other approved financial planning and business software.

Information shared with these providers is limited to what is necessary for service delivery and is subject to contractual and security controls where available.

8. Overseas Disclosure

Some information may be accessed, processed or stored outside Australia, including in Vietnam and the United States.

Where overseas disclosure occurs, we take reasonable steps to ensure recipients protect personal information in a manner consistent with Australian privacy requirements, including through contractual obligations, confidentiality requirements and security controls.

9. Security of Personal Information

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Security measures may include:

- Secure cloud storage;
- Multi-factor authentication;
- Role-based access controls;
- Device and account security measures;
- Confidentiality agreements;
- Staff and contractor privacy training;
- Secure disposal procedures.

While we take reasonable precautions, no electronic transmission or storage method can be guaranteed to be completely secure.

10. Data Retention

We retain personal information only for as long as reasonably necessary to:

- Deliver services;
- Meet contractual obligations;
- Comply with legal and regulatory requirements;
- Resolve disputes and maintain business records.

When personal information is no longer required, we will take reasonable steps to securely destroy or de-identify it.

11. Data Breach Response

We maintain procedures for responding to suspected privacy incidents and data breaches.

Where a data breach is likely to result in serious harm and notification is required under applicable law, we will take appropriate steps to notify affected individuals and relevant authorities.

12. Access and Correction

You may request access to personal information we hold about you and request corrections where the information is inaccurate, incomplete, out of date, irrelevant or misleading.

Requests should be directed to the contact details below. We may refuse access where permitted under applicable law.

13. Cookies and Website Analytics

Our website may use cookies, analytics tools and similar technologies to improve user experience, monitor website performance and understand visitor behaviour.

Users can generally configure their browser settings to reject cookies; however, some website functionality may be affected.

14. Third-Party Sites

Our website may contain links to third-party websites not owned or controlled by DeeTwo Consulting. These links are provided for your convenience, and their presence does not imply our sponsorship or endorsement. We are not responsible for the privacy practices of external websites and encourage you to review their privacy statements when leaving our site. Please feel free to contact us if you have any questions or concerns regarding this Privacy Policy.

15. Marketing Communications

We may send information about our services and business updates.

You may opt out of marketing communications at any time by contacting us or using the unsubscribe option provided.

16. Privacy Complaints

If you believe we have breached your privacy obligations, please contact us in writing.

We will investigate and respond within a reasonable timeframe.

If you are not satisfied with our response, you may contact the Office of the Australian Information Commissioner (OAIC): <https://www.oaic.gov.au>

17. Changes to this Policy

We may update this Privacy Policy from time to time. The current version will always be available on our website.

Contact Information

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