



# **FINANCIAL SERVICES GUIDE & PRIVACY POLICY**

Illingworth David Financial Planning Pty Ltd

441 Moorabool Street

Geelong 3220

T: 03 5221 8070 F: 03 5223 1205

Australian Financial Services Licensee 253127

ABN: 81 007 241 054

# Part 1 – Financial Services Guide

This financial services guide is to help you decide if you want to use our financial services. It has information on who Illingworth David Financial Planning Pty Ltd is and the services we provide.

## What is in a Financial Services Guide?

This Financial Services Guide ('FSG') helps you understand and decide if you wish to use the financial services, we are able to offer you.

It provides you with information about the entities that may provide you with financial services:

- Illingworth David Financial Planning Pty Ltd (IDFP Pty Ltd), AFSL 253127, the "licensee" including representatives who may be its employees or employees of the licensee's related body corporate;
- Financial advisers who are individual Authorised Representatives of the licensee.

We collectively refer to Authorised Representative(s) in this FSG as "us, our, we". We are the providing entity and are the authorized representative(s) of the licensee.

### **Not Independent**

Illingworth David Financial Planning Pty Ltd may receive commissions from life risk insurance products held by our clients. As such, we are neither independent, impartial, or unbiased as defined in Section 923A of the Corporations Act.

This FSG sets out the services we provide. It tells you:

- who we are and how we can be contacted
- what services and products we are authorised to provide to you
- how we (and any other relevant parties) are paid; and
- how we deal with complaints.

We may provide you with personal advice that takes into account your needs, financial situation and circumstances. Where we provide you with personal advice, we will provide you with a Statement of Advice ('SOA'). The SOA outlines our advice and the basis on which the advice was given. It also outlines relevant information about us, our fees and charges associated with our advice. We are only able to provide personal advice about certain products as stipulated under our Australian Financial Services Licence ('AFSL').

If we provide further personal advice after providing our initial advice, we may record this in a Record of Advice, instead of an SOA. You may request a record of the further advice that is provided to you, if you have not already been provided with it. You can also contact us, using the details at the start of this FSG, within 7 years from when the advice is provided to request this record.

Occasionally we provide general advice. This is where we may express an opinion or recommendation influencing you in making a decision in relation to a financial product, but where we HAVE NOT considered your personal objectives, financial situation or needs. If we provide you with general advice, we will provide you with a warning that the advice may not be appropriate to your needs, financial situation or objectives. Additionally, we will provide you with an applicable Product Disclosure Statement ('PDS') (if one is available) which you should read before making a decision that the product is right for you.

When a financial product is recommended to you, you will be provided with a PDS issued by the product provider. The PDS contains information about the product to assist you in making an informed decision about the financial product. It will outline relevant terms, significant risks, and fees and charges associated with the product.

The licensee has arrangements in place to maintain professional indemnity insurance. This insurance satisfies the requirements under section 912B of the *Corporations Act 2001*.

Please retain this FSG for your reference and any future dealings with us. We may also add documents at a later date which will also form part of this FSG, and these should be read together with the FSG. These documents will include the word 'FSG' in the heading.

## Who will be providing the financial services to you?

### The Licensee

The licensee is the authorising licensee for the financial services provided to you and is responsible for those services. The licensee authorises, and is also responsible for, the content and distribution of this FSG.

The licensee's contact details are as follows:

**Licensee name:** Illingworth David Financial Planning Pty Ltd

**AFSL number:** 253127

**Address:** 441 Moorabool St Geelong 3220

**Website:** [www.idaws.com.au](http://www.idaws.com.au)

**Phone:** 03 5221 8070

**Email:** [admin@idaws.com.au](mailto:admin@idaws.com.au)

You may be provided with services by the licensee through its employees, or directors (or the employees of a related body corporate), or alternatively by an Authorised Representative.

### Authorised Representative details

The individual authorised representatives under this licence are:

<b>Name:</b>	Paul Bourke	Emma Alderson	Michael Bond	Jarred Henry
<b>AR number:</b>	331086	300882	224140	1003232
<b>Phone:</b>	03 5221 1000	03 5221 1000	03 5221 1000	03 5221 1000
<b>Email:</b>	<a href="mailto:paul@idaws.com.au">paul@idaws.com.au</a>	<a href="mailto:emma@idaws.com.au">emma@idaws.com.au</a>	<a href="mailto:michael.bond@idaws.com.au">michael.bond@idaws.com.au</a>	<a href="mailto:jarred@idaws.com.au">jarred@idaws.com.au</a>

The authorised representatives named above share the same office as the licensee.

You can provide instructions to us by contacting us using contact details above. If you provide your instructions verbally, we may need you to confirm these in writing and will notify you at the time, if this is the case.

## What services and products are we authorised to provide to you?

The licensee is authorised to provide financial product advice and deal in the following financial products:

- Investment planning and products
- Budget and debt management
- Salary packaging
- Superannuation planning and products
- Retirement planning, pension and annuity products
- Personal insurance and risk management
- Centrelink
- Estate Planning
- Ongoing advice and services

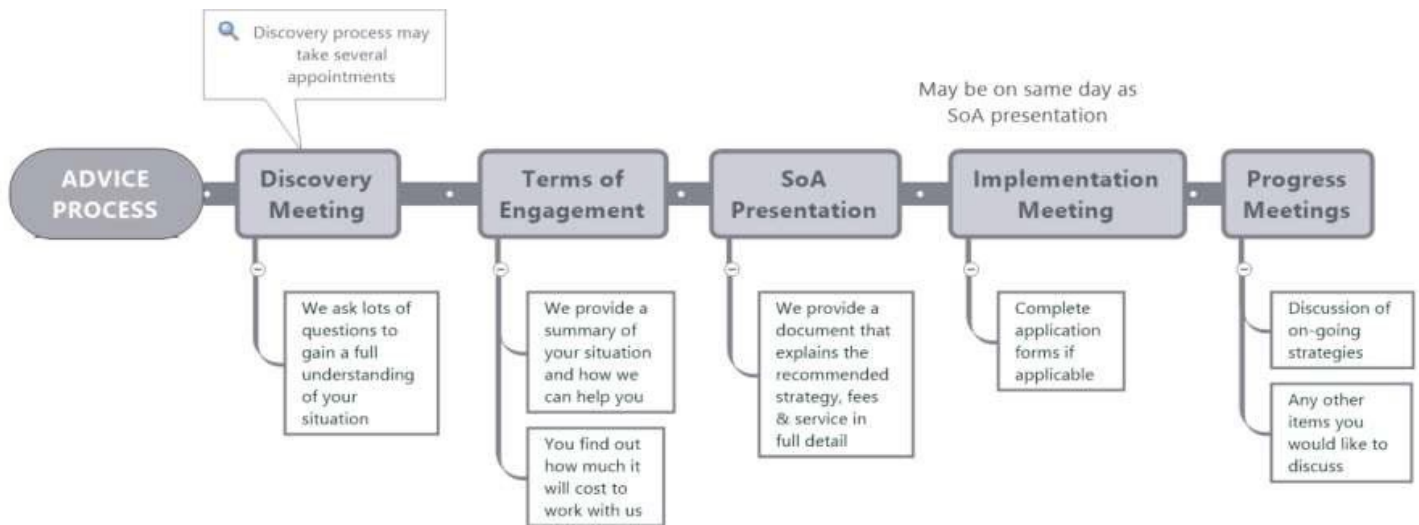
We are authorised to provide these services and products to both retail and wholesale clients.

There is an important difference between 'general advice' and 'personal advice'. If we provide you with 'general advice' it means that we have not considered any of your individual objectives, financial situation and needs. If we provide you with 'personal advice' we will consider your individual objectives, financial situation and needs when making our recommendation to you.

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

In providing our services, other financial matters may arise, however, we are not authorised to assist with any financial and products and services except those explained above. You should seek specific advice from the appropriate professionals on other matters relevant to you.

### Our advice process



### Will you receive advice suitable to your needs and financial circumstances?

To ensure our advice is appropriate we need to find out your individual investment objectives, financial situation and needs before we can make recommendations. It is impossible to give you accurate and appropriate advice without first gathering that information. It is important that you provide complete and accurate information, failure to do so could result in the advice not being appropriate for your circumstances. You have the right not to divulge this information to us. In that case, we are required to warn you about the possible consequences of us not having your full personal information.

We will also make sure that you understand the advice before implementing, and any significant risks will be fully explained to you.

### What fees and commissions are payable to us?

All fees will be fully discussed with you prior to proceeding with any recommendations and these fees will be documented in writing.

#### Initial meeting

We meet the cost of this discovery meeting to determine how we may be able to provide value to your situation.

#### What you pay

##### 1. INITIAL ADVICE FEE

When we fully understand your position and the work required to maximise the probability of you achieving your aspirations and goals, we will advise you of our fee to provide this service. This will be detailed in a Terms of Engagement (TOE) document. The fee includes preparation of a Statement of Advice (SOA) and all implementation of any recommendations, fees range between \$2,200 - \$22,000 (inc GST).

## 2. ONGOING SERVICE FEES

Illingworth David Financial Planning Pty Ltd (IDFP) offers ongoing service to our clients for a flat fee. IDFP will only provide ongoing service and support to those clients who accept the ongoing service package. This fee will be outlined in the TOE and reviewed annually. The fee will range between \$2,200 - \$22,000 (GST inc).

Should there be a significant change in circumstances, you may be charged additional fees where an advice document is required (Statement of Advice). These fees range from \$2,200 - \$22,000 (GST inc).

Should a client not wish to participate in our Ongoing Service Offering, fees for services and transactions will apply. Please note that initial advice fees still apply where you choose not to implement our recommendations.

### Personal Insurance Commissions

We provide two options for clients to pay for insurance recommendations:

1. Clients can elect to pay for our advice through insurance commissions. Upfront commissions range from 28.18% to 60% (exc GST) of the annual premium you pay. The actual amount is calculated on the amount of the premium you pay and varies depending on the product used. Ongoing commissions are also payable on the personal insurance products you hold, they range from 10% to 28.18% (ex GST) of the annual insurance premium you pay for the duration of your holding in that policy. These commissions are paid by the product issuer and are not an additional payment made by you. These commissions are disclosed in a Product Disclosure Statement.
2. Clients pay an initial advice fee for insurance recommendations, for which we receive no commissions. This will provide a discounted premium for the life of the policy. To receive reviews of the insurance policies clients will then pay an additional fee.

### How are we and third parties remunerated?

Paul and Emma are Directors and shareholders of IDFP Pty Ltd. The Directors of IDFP Pty Ltd have a profit share arrangement to distribute company profits annually to shareholders.

The licensee's shareholders will also receive a benefit based on the licensee's ongoing company performance.

By using or continuing to use our services, you agree that:

- All fees and charges received by us as described in this FSG (other than third party fees and charges) are a benefit given to us by you, in exchange for the services provided by us.
- You understand, consent to, authorise and direct us to charge you in this way.

### What arrangements may influence our advice to you?

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 and other benefits that relate to information technology software or support provided by a product issuer or that relate to educational and training purposes. A copy of the register is available on request for a small charge.

We hold our own Australian Financial Services Licence (AFSL) and have an agreement with BT Financial Group - BT Open to provide us with support services, such as compliance, training and technical services. These services incur an annual cost which is payable by the IDFP group.

BT Financial Group is part of the St George Bank group of companies, which also includes ASGARD and Advance Funds Management.

Further details of the incentives, commissions and fees for each product will be provided in the Statement of Advice you will receive when providing you with a recommendation.

### Direct Equity Trading

Illingworth David Financial Planning has an agreement with a panel of brokers for advice and implementation of direct share trades.

## Brokerage and other charges

We have negotiated brokerage of 0.50% (plus GST) or minimum of \$50 (plus GST), for our ongoing service package fee paying clients. This service does not incur any commissions or rebates to Illingworth David Financial Planning.

## Non service package clients & one-off trades

Illingworth David Financial Planning will settle trades for clients who are requesting specific 'no advice' trades. Brokerage of 0.50% (plus GST) or min of \$50 (plus GST) will be applied plus, a fee of \$140 + GST per trade.

## Finance referrals

The Illingworth David Group have an association with Geelong Financial Group (GFG) and may refer you for financial solutions. If you proceed with a product recommended by GFG a related entity may receive a referral fee, any fee is not passed on to the adviser who makes the referral and forms part of the overall profit of the business which is shared via director profit share.

## What should you do if you have a complaint?

If you have a complaint, you can contact us and discuss your complaint. Please contact the Complaints Manager of our licensee using any of the contact details at the start of this FSG. We will try and resolve your complaint quickly, fairly and within prescribed time frames.

We will review your concerns and provide a full written response within 30 days of receipt of your complaint unless the matter is complex or circumstances beyond our control delay the management of your complaint. If this occurs, we will notify you within 30 days of the reason for the delay and provide you the option to escalate the matter to AFCA if you are dissatisfied. If you disagree with our final response to your complaint, you may also escalate your concerns to AFCA, at no cost to you.

The contact details for AFCA are:

Website: [www.afca.org.au](http://www.afca.org.au)  
Email: [info@afca.org.au](mailto:info@afca.org.au)  
Telephone: 1800 931 678 (free call)  
In writing to: Australian Financial Complaints Authority  
GPO Box 3, Melbourne VIC 3001.

## Compensation arrangements

We have arrangements in place to maintain adequate professional indemnity insurance as required by s912B of the Corporations Act 2001. 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.

## Privacy

We collect, use, disclose and maintain personal information, including sensitive information, so we can administer our client relationships and provide financial products and services. We may disclose your information to other parties such as product providers as required to lodge applications, or as required by law (e.g. by the ATO or enforcement agencies). IDFP respects and upholds your rights to privacy protection under the Australian Privacy Principles contained in the Privacy Amendment Act 2012. Our Privacy Policy contains information on how you may access or request to correct your personal information, as well as information on procedures for making a complaint about a breach of the Australian Privacy Principles. Our privacy policy is included at the end of this FSG.

## Anti-Money Laundering/Counter Terrorism Financing Act (AML/CTF)

As a financial service provider, we have an obligation under the Anti-Money-Laundering and Counter-Terrorism Financing Act (AML/CTF) 2006 to verify your identity and the source of any funds. This means that we will ask you to provide identification documents and we will retain copies of these. We assure you that this information will be held securely and treated confidentially as are all of your dealings with us.

# Part 2 – Adviser Profiles

## Planner Profile

### *Paul Bourke CFP<sup>®</sup>, B.Com*

#### *Director*

*Authorised Representative No: 331086*

Illingworth David Financial Planning Pty Ltd is proud to introduce to you Paul Bourke.

Paul has been with Illingworth David Financial Planning Pty Ltd since October 2008 and has been involved in the financial services industry since 2002. Paul's work experience has included various different roles in financial planning which includes, corporate and commercial finance, business banking and financial markets.

Paul holds a Bachelor of Commerce Degree with majors in, Finance, Financial Planning and e-Commerce Management. Paul is a certified Financial Planner (CFP), which is the highest educational standard for Financial Planners. Paul also is a member of the Financial Planning Association of Australia (FPA).

#### Services Paul Can Provide

Paul is able to provide you with comprehensive and expert advice in the following areas:

- Retirement Planning
- Estate Planning
- Aged Care
- Superannuation
- Investment Planning
- Budgeting
- Life, TPD, Trauma and Income Protection insurance
- Gearing (including margin lending)
- Direct Equities
- Arranging for the acquisition and disposal of all relevant products of the type described above and:
- Salary Sacrifice

As part of our services all initial advice provided will be via a comprehensive written Statement of Advice which will clearly outline the following:

- Your current situation
- Strategy recommended
- The goals which you wish to achieve
- Implementation process (should you wish to proceed)
- Fees
- Ongoing review process

Paul is committed to providing high quality professional advice by offering you a tailored solution to your individual financial needs.

# Planner Profile

**Emma Alderson AFP<sup>®</sup>, CPA, B.Com, SSA<sup>™</sup>**

**Director**

**Authorised Representative No: 300882**

Illingworth David Financial Planning Pty Ltd is proud to introduce to you Emma Alderson.

Emma has been with the Illingworth David Group since 2002 and whilst she has spent a majority of this time focusing on accounting, she has always had a passion for personal financial advice. Emma transitioned into our advice team in 2017. Emma's work experience has included various roles in taxation which includes personal, business entities and self-managed superannuation funds.

Emma holds a Bachelor of Commerce Degree with majors in Accounting and Finance. She is a Certified Practising Accountant (CPA) and has specialist knowledge in Self-Managed Superannuation Funds. Emma is an associate of the Financial Planning Association of Australia (FPA) and also a registered tax agent.

## Services Emma Can Provide

Emma is able to provide you with comprehensive and expert advice in the following areas:

- Retirement Planning
- Estate Planning
- Aged Care
- Superannuation
- Investment Planning
- Budgeting
- Life, TPD, Trauma and Income Protection insurance
- Gearing (including margin lending)
- Direct Equities
- Arranging for the acquisition and disposal of all relevant products of the type described above and:
- Salary Sacrifice

As part of our services all initial advice provided will be via a comprehensive written Statement of Advice which will clearly outline the following:

- Your current situation
- Strategy recommended
- The goals which you wish to achieve
- Implementation process (should you wish to proceed)
- Fees
- Ongoing review process

Emma is committed to providing high quality professional advice by offering you a tailored solution to your individual financial needs.



# Planner Profile

## *Michael Bond AFP® Adv.Dip.FS (FP)*

*Senior Financial Planner*

*Authorised Representative No: 224140*

Illingworth David Financial Planning Pty Ltd is proud to introduce to you Michael Bond.

Michael has spent over 30 years in the financial services sector including eleven years with the National Australia Bank, predominantly in consumer and commercial lending and more recently as a Financial Planner and Authorised Representative since 1999.

Michael has experience in matters relating to Centrelink and Retirement Planning. He focuses on developing quality financial solutions for each client, and then keeps regular contact to ensure the plans remain relevant to the client.

Michael holds an Advanced Diploma of Financial Services (Financial Planning). Michael is an Affiliate member of the Financial Planning Association (FPA).

### Services Michael Can Provide

Michael is able to provide you with comprehensive and expert advice in the following areas:

- Retirement Planning
- Estate Planning
- Aged Care
- Superannuation
- Investment Planning
- Budgeting
- Life, TPD, Trauma and Income Protection insurance
- Gearing (including margin lending)
- Direct Equities
- Arranging for the acquisition and disposal of all relevant products of the type described above, and:
- Salary Sacrifice

As part of our services all initial advice provided will be via a comprehensive written Statement of Advice which will clearly outline the following:

- Your current situation
- Strategy recommended
- The goals which you wish to achieve
- Implementation process (should you wish to proceed)
- Fees
- Ongoing review process

Michael is committed to providing high quality professional advice by offering you a tailored solution to your individual financial needs.

# Planner Profile

## Jarred Henry AFP® B.Com

*Senior Financial Planner*

*Authorised Representative No: 1003232*

Illingworth David Financial Planning Pty Ltd is proud to introduce to you Jarred Henry.

Jarred has been a Financial Adviser in the Geelong region since 2014. Jarred has financial planning experience in a range of financial planning services including retirement planning, superannuation and investment.

Jarred holds a Bachelor of Commerce Degree with majors in Finance and Financial Planning. Jarred also is a member of the Financial Planning Association of Australia (FPA).

### Services Jarred Can Provide

Jarred is able to provide you with comprehensive and expert advice in the following areas:

- Retirement Planning
- Estate Planning
- Aged Care
- Superannuation
- Investment Planning
- Budgeting
- Life, TPD, Trauma and Income Protection insurance
- Gearing (including margin lending)
- Direct Equities
- Arranging for the acquisition and disposal of all relevant products of the type described above, and:
- Salary Sacrifice

As part of our services all initial advice provided will be via a comprehensive written Statement of Advice which will clearly outline the following:

- Your current situation
- Strategy recommended
- The goals which you wish to achieve
- Implementation process (should you wish to proceed)
- Fees
- Ongoing review process

Jarred is committed to providing high quality professional advice by offering you a tailored solution to your individual financial needs.

# Part 3 – Privacy Policy

## *Our privacy assurance to you*

At the Illingworth David Financial Planning Pty Ltd your privacy is important to us. Privacy laws apply to how we collect, maintain, use and disclose your personal information and this brochure explains how these laws affect Illingworth David Financial Planning Pty Ltd and you, including:

- the types of information that we keep on record and how we may use that information
- your privacy rights along with our general rights and obligations
- our policies in relation to how we collect, maintain, use and disclose your personal information.

## **Other privacy statements**

When you apply for a new product or service offered or administered by us, the application form will include notices about privacy and requests for consent. Those privacy notices (called privacy statements) will specify in more detail how any information about you may be used or disclosed in relation to the particular product or service. When you apply for or use one of our products or services or a product or service administered by us, you consent to us collecting, maintaining, using and disclosing personal information about you (provided by you or by another person) in accordance with the privacy statements in the application forms, any Agreement you sign and this brochure.

## **What information does Illingworth David Financial Planning Pty Ltd hold?**

The types of information we ask for will depend on the type of product or service requested by you. Generally, we keep a record of one or more of the following types of information about you:

- information that identifies you, such as your name and address and other identification information provided by you and people nominated by you
- if you apply for insurance, information about what is being insured, including health information about you, your income and occupation, information about your beneficiaries, and information about your claims history
- if you apply for a superannuation or investment product or service, information about your employment, beneficiaries, bank accounts for funds to be transferred to or from and, in some cases, health information about you
- transaction information relating to the product or service acquired by you, such as details of contributions and distributions for investment products
- if you apply to become an authorised representative with us, information about your professional background, training and experience, which may include sensitive information.
- All information sought is required for our business purposes, which are detailed generally in this brochure and more specifically in our application for.

We do not actively seek to collect sensitive information (for example health information or information about any criminal record), unless it is necessary for our business purposes. If we do have to collect sensitive information, we will only collect, use and disclose it in accordance with privacy laws.

Sometimes we act as an agent for others when collecting information about you, such as for the insurer underwriting our insurance products ('the Insurer') or on behalf of other parties ('Institutional Business clients') in our capacity as administrator. We will inform you when we do this.

## **How may we use your personal information?**

Generally, we use your personal information to:

- help us process your application for products or services and subsequent investment directions
- effectively manage and administer these products and services (including keeping records required under superannuation laws and the Corporations Act)

- ensure our internal business operations are running smoothly, which may include fulfilling legal requirements, conducting confidential systems maintenance and testing and conducting confidential telephone call monitoring to ensure our staff are properly trained and their service to you continually improved.

If you acquire products or services from a member of the Illingworth David Financial Planning team, your personal information may also be used by other members of the Illingworth David Financial Planning team to analyse products and services, evaluate the needs of our customers and develop new products. Unless you tell us not to or have previously told us not to, we may also provide access to your personal information (excluding health information) to members of the Illingworth David Financial Planning team or use that information ourselves to inform you of products and services offered by any member of the Illingworth David Financial Planning team or other suppliers which we think may be of interest or value to you.

Any form used to collect your information may give more specific details about the way we use your information.

### **What rights do we have to disclose personal information?**

Generally, we must obtain your consent before we tell anyone about you, or your investments. You can give us your consent expressly (by telephone or writing to us) or it may be implied by your conduct.

An example is giving your investment details to a court if we are ordered to do so under a subpoena. Depending on the product or service we provide to you, we may also disclose your personal information to:

- our external service providers that provide services to us. This is on a confidential basis and includes organisations that provide us with financial, advisory, administrative or other services, such as investment managers of products you select, financial institutions you nominate, industry bodies, mail-houses contracted to mail information to you in relation to your products and services and archive companies
- anyone acting on your behalf, including your financial adviser or broker, their office and licensed dealer. We may do this by making this information available to them through an electronic facility or service (operated by us or an external service provider) that they use in the administration of their practice
- anyone who holds amounts on your behalf which will be transferred to or from us
- to any party acquiring an interest in our business
- to a complaints body to whom a complaint relating to a product or service is referred
- where the law requires or permits us to do so
- if you consent.

Similarly, for insurance products, we may disclose personal information about you to the Insurer without getting your consent. These parties are required to comply with the privacy laws in using any such information.

If you are a financial adviser, from time to time we may also use or give access to your personal information to the investment managers with whom you place client investments. The information we provide is limited to your name and business contact details, together with details of our funds under administration in relation to the particular investment manager, including inflow and outflow information. We do this on a confidential basis to enable those investment managers to analyse products, services and customer needs and to market products and services supplied by the investment manager that may be of interest to you. We will not provide this information to investment managers if you tell us not to. Email us if you prefer for your details (as listed above) not to be provided to investment managers.

We may at other times give you more details about our disclosure practices in relation to specific products or services - for example on the disclosure documents and applications we use to collect personal information about you.

### **Use of your personal information by the insurer**

If you acquire an insurance product underwritten by the Insurer, the Insurer may use personal information about you for purposes as disclosed in its own privacy policy and in the disclosure document for the product or service you choose.

You can obtain a copy of the Insurer's privacy policy by contacting the Insurer directly or through us.

## How we protect the security of your information

We take all reasonable steps to protect your personal information from misuse, loss, unauthorised access, modification or disclosure. We have physical, electronic and procedural safeguards to protect your information held by us. For example, your personal information is stored in secured office premises, in electronic databases requiring logins and passwords for access. We require all staff to maintain the confidentiality of your personal information.

We use secure methods to destroy or deidentify any personal information as soon as the law permits, provided the information is no longer needed by us for any purpose.

## Changes to our privacy policies

We may amend this Privacy Brochure from time to time. Not all changes to our privacy policies will require your consent, for example where office security procedures are changed. We will notify you of any change to our policies that require your consent before being implemented.

## What are your rights?

Unless required by law (for example to comply with a legal duty of disclosure when applying for an insurance product) you need not give us any of the personal information about you or any other person which may be requested in our communications with you. However, without that information, we may not be able to process an application, fulfill your request or provide you with an appropriate level of service.

Where we collect information from you about another individual, for example your nominated beneficiaries, please make that individual aware of that fact and the contents of this Privacy Brochure.

## Access to your information

You may request access at any time to personal information held by us about you. We will process your request within a reasonable time, usually 14 days for a straightforward request. More time may be needed, depending on the nature of the request.

There is no fee for requesting access to your information, however we may charge you the reasonable costs of processing your request. Sometimes we are not required to provide you with access. If we refuse you access to your personal information, we will tell you the reason why. If we are not required to provide you with access to the information requested, we will consider, if reasonable, whether the use of a mutually agreed intermediary would allow sufficient access to meet your needs and ours.

## Correction of information

We try to ensure that all information held by us about you which we collect, use or disclose is accurate, complete and up to date. However, you must promptly notify us if there are any changes to your personal information.

You may ask us at any time to correct personal information held by us about you which you believe is incorrect or out-of-date. We will deal with your request within a reasonable time.

If we disagree as to the accuracy of the information, you may request that we make an appropriate notation in relation to that information noting you consider it is not accurate, complete or up to date.