

# FINANCIAL SERVICES GUIDE

Dated 09 November 2021

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 *BlueRocke Investment Advisors ACN 166 911 155* 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

BlueRocke Investment Advisors (Authorised Representative No. 453791), and your adviser, Dev Sarker (Authorised Representative No. 453792), are the providing entity and authorised representatives of Australian Investment & Insurance Group Pty Ltd ("AIIG"). You can provide instructions to us by using the contact details below:

ABN: 80 166 911 155 ACN: 166 911 155  
167 Flinders Street, Adelaide SA 5000  
Level 3, 478 George Street, Sydney NSW 2000  
T: 1300 717 136  
E: [info@bluerocke.com.au](mailto:info@bluerocke.com.au)

## ABOUT OUR LICENSEE

Australian Investment and Insurance Group 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 BlueRocke Investment Advisors or your adviser. AIIG's details are:

ABN: 93 068 486 126 ACN: 068 486 126  
Unit 1, 216 Glen Osmond Road, Fullarton SA 5063  
T: (08) 8338 5155 F: (08) 8338 5144  
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;
- Your adviser's experience, qualifications and accreditations;
- The financial products and services they are authorised to offer; and
- Any applicable referral arrangements.

## LACK OF INDEPENDENCE

BlueRocke Investment Advisors and your adviser, Dev Sarker 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; and
- 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 takes into account your personal circumstances, goals, needs and objectives.

Following our initial advice, we will either 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 Director Portfolio Service (IDPS) Guide containing information on that particular product. The document will contain information about the relevant key features, fees, benefits and risks related to the financial product to help you make an informed decision about whether or not to acquire the financial product.

## **WORKING WITH A FINANCIAL ADVISER**

Your adviser is required by law to act in your best interests in relation to the personal financial advice they provide.

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 or other financial services to you. Your adviser will let you know which identification documents can be presented for identification purposes.

## **FINANCIAL SERVICES WE CAN PROVIDE**

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

- Deposit products;
- Debentures, stocks and bonds issued by a government;
- Securities (including shares);
- Life Insurance Risk Products;
- Life Insurance Investment Products (including investment bonds);
- 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
- On-going 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-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. Your adviser will also receive a salary as an employee of BlueRocke Investment Advisors for the services they provide, which includes providing financial product advice.

### **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 for advisers to attend conferences). As our authorising Licensee, AIIG maintains 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**

AIIG, 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;
- Atlantic Pacific Securities 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.

### **COMPENSATION ARRANGEMENTS**

The Licensee has arrangements in place to maintain adequate professional indemnity insurance as required by s912B of the *Corporation's Act 2001* (Cth). This insurance provides cover for claims made against this Licensee and its representatives, including claims in relation to the conduct of representatives who are no longer authorised by the Licensee but who were authorised by the Licensee 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 BlueRocke Investment Advisors, your adviser directly or AIIG's complaints officer to discuss your complaint:

Complaints Officer  
Australian Investment & Insurance Group Pty Ltd  
Unit 1, 216 Glen Osmond Road Fullarton SA 5063  
T: (08) 8338 5155  
E: [info@aiig.com.au](mailto:info@aiig.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

## DEV SARKER

**Dev Sarker** is an Authorised Representative (No. 453792) of Australian Investment & Insurance Group Pty Ltd (AFSL No. 226405).

### EXPERIENCE

Dev has over 30 years' experience in the finance advisory sector.

### QUALIFICATIONS

- Associate Chartered Accountant (ICAEW)
- Master of Business Administration (University of London)
- Fellow Chartered Accountant (ICAI)
- Bachelor of Commerce (Hons)
- Advanced Diploma in Financial Planning (with SMSF, Gearing)
- ASX Accredited Listed Product Adviser

### ADVICE AND SERVICES OFFERED

- Personal insurance
- Superannuation
- Investments
- Self-managed Superannuation Funds
- Retirement planning
- Estate planning
- Budget and cashflow management
- Debt management
- Centrelink/DVA
- Business insurance
- Gearing / Debt strategies
- Securities

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

### PRODUCT ARRANGEMENTS

We 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 and will be in the following range:

Fee / Service	Range (AUD)
Planning Fees (including Statement of Advice)	\$4,500 - \$6,000 plus GST or as agreed
SMSF Service and Advice	\$375 per hour plus GST
Ad hoc Financial Advice	\$375 per hour plus GST
Centrelink Admin. Support and Investment Summary Reports	\$150 per hour plus GST
Ongoing Service Fee	0.8% to 1% per annum plus GST or as agreed Based on funds under management
Insurance Commission*	Range
<i>Upfront Commission</i> on Life Insurance Products	0% - 66% of first year premium paid
<i>Ongoing Commission</i> on Life Insurance Products	0% - 33% of ongoing premium paid

\*Note: commission clawbacks may arise if policies are cancelled within 24 months

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

# PRIVACY POLICY

**Dated 09 November 2021**

BlueRocke Investment Advisors, together with our employees (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 BLUEROCKE INVESTMENT ADVISORS AND ITS AUTHORISED REPRESENTATIVES HOLD?

We collect and hold personal information about you that is both relevant and necessary in order 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:
  - your investments;
  - your insurance policies;
  - estate planning strategies;
  - taxation information;
- health information; and
- lifestyle information

## HOW DOES BLUEROCKE INVESTMENT ADVISORS 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 in the course of 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.

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 BLUEROCKE INVESTMENT ADVISORS DISCLOSE MY PERSONAL INFORMATION TO?

We may disclose personal information to:

- a related entity of Bluerocke Investment Advisors;
- 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; and
- anyone else to whom you authorise us to disclose it or is required by law.

We may use and disclose information to a credit provider:

- to provide you with information we believe may be relevant or of interest to you; and
- to let you know about other products or services we offer, or that a related entity offers, and
- to send you information about special offers or invite you to events.

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 BLUEROCKE INVESTMENT ADVISORS 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, United States of America, United Kingdom, Singapore and India 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;
- employees have restricted access to certain sections of the system; and
- unauthorised employees are barred from updating and editing personal information.

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

- we ensure that employees only have access to personal information which is directly relevant to their duties;
- employees must 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 of time. 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 of time.

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 BLUEROCKE INVESTMENT ADVISORS 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  
Unit 1, 216 Glen Osmond Road Fullarton SA 5063

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.