

# Financial Services Guide

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Version 1.3, 1 August 2023



Rodney M. DeGabriele and Nicholas Miller  
Affinity Private Advisors Pty Ltd A.C.N. 618 291 786  
Authorised Representative No. 1254093

# Important Information

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This Financial Services Guide (FSG) is designed to clarify who we are and what we do, and help you decide whether to use our services.

To make things simple, this guide explains:

- who we are and how we can be contacted;
- the services and types of products we are able to offer you;
- how we and our associates are paid and any other benefits we may receive;
- how we protect your privacy and handle your personal information; and
- how we resolve disputes, and what you should do if you have one.

Please read through the entire FSG, as it's full of useful information – and is also worth holding on to for future reference. And of course, if you ever have any questions, please contact us.

## Other documents you may receive

We may provide you with personal advice that considers your needs, financial situation and circumstances. Where we provide you with personal advice we will provide you with a Statement of Advice (SOA), in addition to this FSG.

This will describe:

- advice and strategies we recommend and the reasons why;
- the financial products and services we recommend and the reasons why;
- any fees or commissions we will receive; and
- any associations we have with financial product providers or other parties that may influence the advice we provide.

Should we provide further personal advice after providing our initial advice, we may record this in a Record of Advice (ROA), instead of an SOA.

Occasionally we provide general advice, where we may express an opinion or recommendation influencing your decision in relation to a financial product, but have not considered your personal objectives, financial situations or needs. In this circumstance (as well as where any financial product has been recommended to you), we will provide you with an applicable Product Disclosure Statement (PDS) (when available) which you should read before deciding if that specific product is appropriate for you as it will outline relevant terms, significant risks, fees and charges associated with the product.

## Giving us instructions

If you wish to make changes to your financial plan or provide other instructions, please contact us. Please refer to the "Contact us" section of this FSG for our contact details.

## Contact us

For more information on anything you have read in this FSG, to obtain a copy of our Privacy Policy or if there is anything else, we can help you with, please contact us at:

**Address:** Level 5 North Building, 333 Collins Street, Melbourne VIC 3000

**Phone:** 1300 769 304

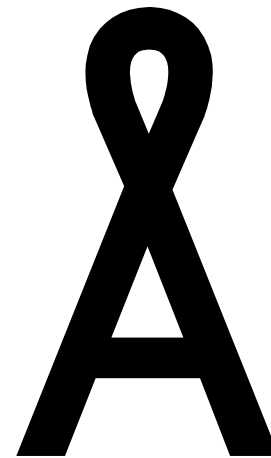
**Email:** [enquiries@affinityprivate.com.au](mailto:enquiries@affinityprivate.com.au)

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

## Not Independent

Affinity Private Financial Services 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.

# About us & our Licensee



We are authorised representatives of Affinity Private Financial Services Pty Ltd ABN 64 639 980 724 Australian Financial Services Licence Number 522707.

**Address:** Level 5, North Building, 333 Collins St, Melbourne VIC 3000

**Phone:** 1300 769 304

## Our recommendations

We generally recommend products that are listed on Affinity Private Financial Services Pty Ltd's approved product list. Before any products are added to this list a review process is undertaken and products are required to meet minimum standards. If these products are not appropriate for your circumstances then we may recommend a product outside of this list. At all times, we will ensure that our recommendations are in your best interests.

Affinity Private Financial Services Pty Ltd financial planners are required by law to provide financial advice that meets the obligations set out in the Corporations Act to act in the best interests of each client.

## Who we are

The following financial advisors are authorised to provide the financial services referred to in the 'What we do' section of this FSG to you on behalf of Affinity Private Financial Services Pty Ltd:

### Rodney M. DeGabriele

Authorised Representative No. 340280

Rodney and Affinity Private Advisors Pty Ltd are representatives and offer our services on behalf of Affinity Private Financial Services Pty Ltd.

The Financial Services that the above advisor offers is provided by Affinity Private Advisors Pty Ltd ACN 618 291 786 ATF Affinity Private Advisors Unit Trust ABN 83 919 484 863 trading as Affinity Private Advisors Authorised Representative No. 1254093.

Affinity Private Financial Services Pty Ltd has authorised us to provide you with this Financial Services Guide.

### Nicholas Miller

Authorised Representative No. 1263611

Nicholas and Affinity Private Advisors Pty Ltd are representatives and offer our services on behalf of Affinity Private Financial Services Pty Ltd.

The Financial Services that the above advisor offer is provided by Affinity Private Advisors Pty Ltd ACN 618 291 786 ATF Affinity Private Advisors Unit Trust ABN 83 919 484 863 trading as Affinity Private Advisors Authorised Representative No. 1254093.

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## What we do

We are authorised by Affinity Private Financial Services Pty Ltd

to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management
- Borrowing to invest (Gearing)

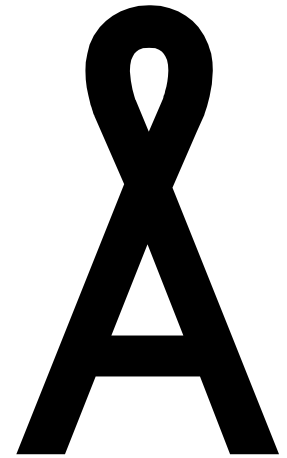
and to provide financial advice and deal in the following financial products:

- Basic Deposit Products
- Non-basic Deposit Products
- Life Products – Investment Life Insurance
- Life Products – Life Risk Insurance
- Superannuation
- Retirement Savings Accounts
- Managed Investment Schemes, including Investor Directed Portfolio Services (IDPS)
- Government Debentures, Stocks or Bonds
- Securities
- Standard Margin Lending Facilities

We are not authorised to provide any other financial services or financial products on behalf of Affinity Private Financial Services Pty Ltd.

Where we are not authorised to provide you with a financial service or financial product that you are interested in, or that we believe you may require we will advise you of this and may refer you to an alternative professional who can assist.

# Adviser Profiles



## Rodney M. DeGabriele

Rodney has over 20 years' experience advising executives, professionals, charities and family offices, working for Australia's leading investment, private and business banks. Rodney is an astute business owner, running thriving financial planning businesses, and experienced equity and property investor.

Rodney is a highly technical, strategic thinker, who is committed to constant innovation and extension for the benefit of clients, including undertaking a Master's Degree in Financial Planning. Rodney studied Communications at Monash University and has since completed a graduate certificate and diploma in Financial Planning. He is a SMSF Specialist Advisor™ and has a Professional Certificate in SMSF's awarded by Adelaide University.

Rodney currently sits on numerous advisory boards and finance committees for non-for profit and religious organisations. He focusses on delivering exceptional financial advice and collaborates with leading lawyers and accountants to ensure a seamless financial outcome is achieved for his clients.



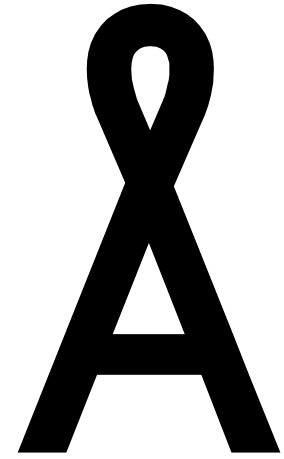
## Nicholas Miller

Nicholas has an extensive background working in professional financial advisory since 2005. He has worked within wealth management, private family offices, and corporate banking.

His varied experience enables him to work with clients of differing needs and to grow relationships built on trust. His focus is to provide clients with comprehensive strategic and investment advice that supports wealth creation and preservation.

Nicholas has a Bachelor of Business with a Major in Finance, a Diploma of Financial Planning, and is qualified in Self-Managed Superannuation Funds.

# Our Advice Process



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**Creating clarity and efficiency in your financial affairs comes from following a robust, systematic process of analysis, strategy and execution. Affinity Private Advisors offers an initial structured advice experience that helps you to understand your aspirations and uncover the depth of opportunities to design your most effective financial system, and an ongoing advice program to allow you to make the most of these opportunities.**

## **1. Understanding You (initial engagement)**

Financial planning offers a strategic, comprehensive solution to managing your finances, for now and the future. Effective financial planning can make your life easier, facilitate financial security, and see you achieving your life goals sooner. Our initial interactions focus on understanding who you are and securing what is most important to you. We will initially discuss by telephone your main drivers for seeking financial advice, and how we are best able to assist.

We then arrange a face to face workshop which focuses on your personal values and how this links through to your life goals, and the financial resources required to achieve them. In order for you to achieve maximum benefit from the workshop, we invite you to send through your financial information for our review before we meet.

## **2. Analysing your opportunities**

As sound professional financial planning demands technical analysis and scenario-planning to identify the best solution for the outcomes you desire, our team examine your financial position to understand the opportunities available to you.

## **3. Designing your efficient financial system**

In strategy design, we bring together your values and goals with your financial capability to form a unique solution. Once we have helped you create your strategy plan, you will be clear on how your financial affairs can be structured efficiently, how your assets can be appropriately invested and where you should ideally allocate your resources.

## **4. Implementing your strategic plan**

Should you wish to proceed with the advice, the final stage in the initial advice process is executing your financial system. Throughout this process, we work closely with your existing professional advisors, such as your accountant and lawyer, to ensure consistency and alignment on all financial and legal matters. After this process, you will have the peace of mind that all your financial affairs are integrated into a comprehensive system to maximise efficiency, growth and certainty for the future.

# Privacy Notification

## How we manage your personal information

**We are grateful for the trust and confidence you have in us to safeguard your privacy. This notification protects us and explains to you how we collect your information, what we use it for and who we share it with. It also points out some key features of our Privacy Policy. For a copy of our Privacy Policy, please ask us.**

If you would like more information about our Licensee Affinity Private Financial Services Pty Ltd, please also refer to the Affinity Private Financial Services Pty Ltd Privacy Statement available at <https://affinityprivate.com.au/privacy-statement/>.

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### Collecting and using your personal information

We need to collect and use your personal information (which may include your sensitive information, such as health information) for a variety of purposes, including to provide you with the financial services you have requested (including answering your requests and complaints, varying products and services and managing your relevant product portfolios) and to contact you about other products and services that may be relevant to you. It is also necessary for us to collect personal information in order to prevent or investigate any fraud or crime, or any suspected fraud or crime.

We'll collect your personal information from you directly whenever we can. Sometimes we collect your personal information from other sources or third parties such as your Accountant. We do this only if it's necessary to do so, for example where:

- we cannot get hold of you and we rely on publicly available information to update your contact details;
- we need information from an insurer about an insurance application you make through us;
- at your request, we exchange information with your legal or financial advisors or other representatives.

You may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

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

If you do not provide your information to us, we may not be able to:

- provide you with the product or service you desire;
- manage or administer your product or service;
- verify your identity or protect against fraud; or

- let you know about other products or services that might better meet your financial and lifestyle needs.

If you choose to provide us with incomplete or inaccurate information, the advice that we provide to you may not be appropriate in light of your overall circumstances. In this scenario, you will need to consider its appropriateness to your overall situation prior to proceeding.

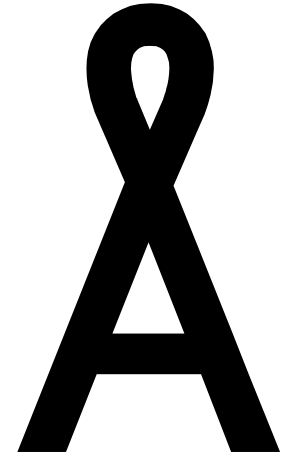
### Protecting your privacy

Protecting your privacy is essential to our business. Your file, containing your profile, personal objectives, financial circumstances and our recommendations, is kept securely.

### Disclosing your personal information

We may share your personal information (which may include your sensitive information, such as health information where we have your consent) with third parties for any purposes for which we use your information. This may include to the following types of third parties:

- those involved in providing, managing or administering the products or services you have requested, including other advisors, paraplanners and organisations who work with us, including Affinity Private Financial Services Pty Ltd, depending on the financial services and products you have requested;
- insurance providers, superannuation trustees and product providers related to the financial services you have requested;
- professional associations and organisations that help us operate our business, such as those that provide administrative, financial, accounting, insurance, research, legal, strategic advice, auditing, computer or other business services, including our Licensee Affinity Private Financial Services Pty Ltd;
- your representatives, service providers, or other organisations, such as your accountant, solicitor, tax agent, stockbroker or bank;
- organisations involved in a business restructure or a transfer of all or part of the assets of our business; and
- government and regulatory authorities and other organisations when required or authorised by law (in some instances these bodies may share it with relevant foreign authorities) where you have given your consent.



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We run our business in Australia. In order to provide you with our services however, we may share your information with organisations outside Australia (for example information technology service providers). You can view a list of the countries in which those overseas organisations are located in, in our Privacy Policy.

We may also store your information in cloud or other types of networked or electronic storage. As electronic or networked storage can be accessed from various countries via an internet connection, it is not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

### **Consent to marketing activity**

We presume you consent to being contacted by us (including Affinity Private Financial Services Pty Ltd) about suitable products and services via the contact details you have provided. We may continue to contact you for these reasons until you withdraw your consent. You can do this at any time by contacting us (see the 'Contact us' section of this FSG). We will process your request as soon as practicable.

### **Gaining access to your personal information**

You can gain access to your personal information that we hold about you. This is subject to some exceptions allowed by law. We will give you reasons if we deny access. You can find out how to access your information by reading our Privacy Policy, available by contacting us.

### **Correcting your Information**

You can ask us to correct information we hold about you. You can find out how to correct your information by reading our Privacy Policy or by contacting us.

### **Complaints**

If you have a complaint about a privacy issue, please tell us about it. You can find out how to make a complaint and how we will deal with these complaints, by reading our Privacy Policy (or by contacting us by writing via [complaints@apfinancialservices.com.au](mailto:complaints@apfinancialservices.com.au)) or by referring to the 'Your confidence in our advice' section of this FSG.

### **Further information**

If you have any questions or comments about our Privacy Policy and procedures, please contact us by using the contact details set out in the 'Contact us' section of this FSG.

**For more information about your privacy, you can also visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).**



# Your confidence in our advice

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Your satisfaction is very important to us and we have procedures in place to resolve any concerns promptly and fairly.

## Our complaints procedure

If you're unhappy with the advice you receive or other aspects of our service, please follow the steps outlined below.

1. Please let your financial advisor know so we can act on it immediately
2. If your advisor has not satisfactorily resolved your complaint, please contact our Advice Dispute Resolution Team on:

**Phone:** 1300 769 304

**Email:** [complaints@apfinancialservices.com.au](mailto:complaints@apfinancialservices.com.au)

**In writing to:** Advice Dispute Resolution Team  
Affinity Private Financial Services Pty Ltd  
Level 5, North Building, 333 Collins Street, Melbourne VIC 3000

3. If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer the matter to an External Dispute Resolution Scheme as follows:

If your complaint isn't resolved **within 30 days** or to your satisfaction, then you may refer the matter to **the Australian Financial Complaints Authority (AFCA)**:

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

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

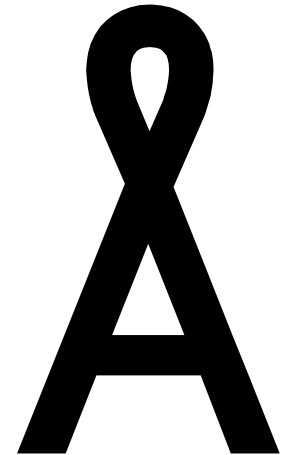
**Telephone:** 1800 931 678

**In writing to** Australian Financial Complaints Authority  
GPO Box 3, Melbourne VIC 3001

AFCA provides fair and independent financial services complaint resolution that is free to consumers. Time limits may apply to lodge a complaint with AFCA, therefore, you should act promptly. You can check the AFCA website to find out if a time limit applies or when the time limit relevant to your circumstances expires.

Affinity Private Financial Services Pty Ltd holds professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our advisors who were authorised by Affinity Private Financial Services Pty Ltd at the time of providing the advice but are no longer authorised representatives of Affinity Private Financial Services Pty Ltd at the time of your complaint.

# Payments and benefits we receive



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You can pay for the services you receive on a fee for advice basis. This allows you to know that you are paying for our advice irrespective of any product you use, clarifies the services you are entitled to, and ensures all recommendations are driven by your needs.

We will agree with you the amount you pay based upon:

- a flat dollar fee;
- an hourly rate;
- the amount you invest; or
- a combination of the above.

You can pay in the following ways:

- as a fee for advice that will be deducted from your investments as a one-off payment or instalments;
- by direct invoice from us for initial and ongoing advice; or
- a combination of the above.

If you are not already on a fee for advice package, you can move to this payment at any time.

## Other payments we may receive

We will provide you with details of all fees, commissions or other benefits we may receive when we provide advice to you and, where possible, will give actual dollar amounts. If we cannot provide this accurately, we will provide worked-dollar examples.

Even if you don't receive personal financial advice from us, you can still request the details of any fees, commissions or other benefits we receive in relation to any other financial service we provide you.

## Benefits we may receive

Sometimes in the process of providing advice, we may receive benefits from product providers.

## Conferences

We may attend conferences and professional development seminars that have a genuine education or training purpose. Affinity Private Financial Services Pty Ltd, or our employer, may pay for the costs of our travel and accommodation, and events and functions held in conjunction with the conference or seminar.

## Non-monetary benefits

We keep a register detailing certain non-monetary benefits that we receive e.g. benefits valued between \$100 and \$300, and those that relate to genuine education or training and technology software or support.

You can view an extract of the register by contacting us. Please be aware that Affinity Private Financial Services Pty Ltd may charge you for the cost of providing this information to you.

# How we charge for our services

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We are a passionately fee for advice practice and we strongly believe in eliminating potential conflicts of interest wherever possible.

To best serve your interests, we will accept no remuneration from any source other than the fees for our service, as set out below. As we believe in transparency, all fees below are quoted inclusive of GST.

#### **Initial Engagement**

Our initial interactions focus on understanding who you are and securing what is most important to you. We will initially discuss by telephone your main drivers for seeking financial advice, and how we are best able to assist.

We then arrange a face to face workshop which focuses on your personal values and how these links through to your life goals, and the financial resources required to achieve them. In order for you to achieve maximum benefit from the workshop, we invite you to send through your financial information for our review before we meet.

Your investment in the workshop will be between \$550 - \$2,200, which will be offset against future advice costs.

#### **Advice preparation**

The cost of your advice will reflect the complexity of your needs and the quality and availability of information about your current position. As a guide, our advice fees are generally between \$5,500 and \$16,500.

This fee is payable in advance once you engage us to proceed to prepare recommendations for you. Alternatively, if agreed, the first 50% of this fee is upfront, with the balance payable when your recommendations are presented.

#### **Ongoing fee for service**

To obtain maximum benefit from your advice, we form a lasting partnership with you, ensuring that you remain on track to achieve your goals. The flat dollar fee for our on-going service will be determined by the complexity of your needs and the intensity of our relationship.

The ongoing service fee is collected monthly directly from investment portfolio or via credit card or direct debit. Generally, our fees range from \$1,000 to \$8,000 per month.

#### **Fixed Term Advice and Services Agreements**

You can elect to enter into a 12-month Fixed Term Advice and Services Agreement as part of your financial planning strategy so you can receive advice services such as a meeting to review your plan. Details of the services will be set out in your 12-month Fixed-Term Advice and Services Agreement.

The fee can range from a minimum of \$5,500 while the maximum is 1.5% of the value of your portfolio each year. The fee applied will be commensurate to the level of service needed and the complexity of the advice provided and will be outlined and agreed with you in the Agreement.

For example, for investments valued at \$1,000,000 the maximum annual fee would be \$15,000 pa.

Borrowed funds – if we recommend you acquire investments using borrowed funds then your annual fee will be a minimum of \$5,500 and a maximum of \$70,000 pa.

#### **Ad hoc advice**

Where you do not wish to participate in an ongoing service fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of between \$330 and \$550 may apply.

#### **Execution only service**

Where you do not wish to participate in an ongoing service fee arrangement but require our services to facilitate buying or selling of a product as instructed by you, an hourly fee of between \$330 and \$550 may apply.

#### **Stamping Fees**

Where we receive stamping fees from issuer companies for raising capital or debt on behalf of that company, we will offset this payment against the cost of our advice to you.

#### **Margin loans**

We do not receive commissions either directly or indirectly from any margin lending products.

#### **Insurance Products**

Our preference is not to receive commissions either directly or indirectly from any life insurance product provider unless it is in your best interest for us to do so. We will give you the option on whether we accept the commissions, or you pay a fee for service for this area of advice, separately to our strategic advice fees. All details will be provided within our Statement of Advice.

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**Notes**

All commissions and fees are inclusive of GST.

Fees could be greater than those disclosed above in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

## Contact us

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**For more information on anything you have read in this document or if there is anything else we can help you with, please do not hesitate to contact us on:**

**Phone:** 1300 769 304

**Email:** [enquiries@affinityprivate.com.au](mailto:enquiries@affinityprivate.com.au)

**In writing to:** Affinity Private Advisors Pty Ltd

North Building, Level 5, 333 Collins Street, Melbourne VIC 3000