



# Financial Services Guide

**21 May 2021**

Version 1

**Part 2**

**This document is part of a Financial Services and Credit Guide (“Guide”) and should be read in conjunction with Part 1 (A Guide to Our Relationship with You and Others) version 19, dated 1 February 2021.**

This section is designed to provide you with enough information to decide whether to obtain financial advice (or any other financial service) from us. It’s an important document that will introduce your adviser, Helen Janetzki, and provide you with the information you need to consider before you engage us to provide you with advice or services.

This document complements Part 1 that provided information about our Licensee and the types of documents – Statements of Advice, Records of Advice and Product Disclosure Statements – that you will receive if we provide you with personal advice. Part 1 also explained how you can provide information to us, our compensation arrangements and who to contact if you want to provide feedback or complain about our advice or services.

We’ve tried to be as clear and direct as possible but if you have any questions, we’re happy to answer them.



## Authorised Representative Profile

Your adviser is Helen Janetzki, an Authorised Representative of Paragem.  
Helen Janetzki's ASIC Authorised Representative number is 242550.

Helen Janetzki has spent over 10 years in financial services and has a Business Degree in Banking and Finance and a Diploma of Financial Planning. Helen Janetzki is a Certified Financial Planner (CFP ®) of the Financial Planning Association of Australia and a Fellow of the Financial Institute of Australasia.

The Financial Services we offer are provided by Proxima Financial Group Pty Ltd, ABN 69 108 042 708 trading as Proxima Financial Planning Corporate Authorised Representative No. 269744.

Helen Janetzki's employer is Proxima Financial Planning, which is a Corporate Authorised Representative (CAR no. 269744) of Paragem.

Proxima Financial Planning is located at Level 2, 135 Fullarton Road, Rose Park SA 5067

Helen Janetzki is authorised by Paragem to advise and deal in the following financial products:

- Deposit products (cash and Term Deposits)
- Debentures, stock and bonds issued by a government
- Life Insurance risk products
- Life Insurance investment products
- Managed Investment Schemes (Unit Trusts)
- Securities (shares)
- Superannuation
- Retirement Savings Accounts
- Self Managed Superannuation Funds
- Standard Margin Lending Facility

Helen Janetzki is not authorised to recommend any strategy that involves an agricultural scheme investment, direct property, derivatives and unregistered managed investment schemes.



## Remuneration

Financial advice has value, but it also involves fees and charges. We are committed to transparency because we believe it's important that you're able to make an informed decision about our advice and its benefits. You may pay a fee for a service, and we may also receive commissions from product issuers, if you engage us to provide advice, implement our recommendations or act on your instructions. Rest assured that the relevant costs or fees will be discussed with you by your adviser before any services are provided.

Paragem will pay Proxima Financial Planning 100% of the fees and/or commissions detailed in this schedule. Paragem will charge Proxima Financial Planning for licensee services, which is not linked to client revenue.

Helen Janetzki is a director of Proxima Financial Planning and is remunerated by distributions from this company.

## Advice Fees

We are predominantly a Fee for Service organisation. There are set fees for each service that I provide to you, and these fees will be agreed upon and confirmed to you prior to any service being provided. Current fees and charges are detailed below and are GST inclusive:

### How we charge for our services

Fees are calculated based on the level of service needed and the complexity of the advice given, to provide value to you. All fees and commissions are inclusive of GST and the fees could be greater than those disclosed below in complex cases. In these instances, we will inform you of the exact fee payable promptly in writing.

<b>Initial consultation</b>	Complimentary (first hour)
<b>Strategy Presentation</b>	Our fee is \$440 per hour and the overall cost to you is commensurate with the level of complexity and nature of the advice we provide.
<b>Advice preparation</b>	Our fee is \$440 per hour and the overall cost to you is commensurate with the level of complexity and nature of the advice we provide.
<b>Implementation</b>	Our fee is \$440 per hour and the overall cost to you is commensurate with the level of complexity and nature of the advice we provide.

<p><b>Ongoing fee for advice</b></p>	<p>If you elect to pay a fee for the ongoing review of your financial planning strategy, the ongoing fee is based on the complexity of ongoing advice and the services provided. The minimum fee is \$2,750 per annum while the maximum is \$11,000 per annum.</p> <p>Borrowed funds – if we recommend you acquire investments using borrowed funds then your ongoing fee will be a minimum of \$2,750 and a maximum of \$11,000 pa.</p> <p>The ongoing advice fee will be based on the level of service needed and the complexity of the advice. Complex advice requirements include the use of trusts and ownership structures, overseas assets or incomes, executive options or multiple investment entities. The frequency of the review will also impact on the fee charged.</p>
<p><b>Fixed Term Advice and Services Agreements</b></p>	<p>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.</p> <p>The fee can range from a minimum of \$2,750 while the maximum is 0.8% of the value of your portfolio each year or \$11,000. 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.</p> <p>The Fixed Term Advice fee may be collected monthly through the product issuer or paid directly by you via credit card, direct debit, BPay or cheque.</p>
<p><b>Ad hoc advice</b></p>	<p>Where you do not wish to participate in a 12 month Fixed Term Advice and Services Agreement but require ongoing advice on an ad hoc basis, an hourly fee of \$440 may apply.</p>
<p><b>Execution only service</b></p>	<p>Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off minimum of \$440 fee may apply</p>

## Commissions

### Insurance Products

Commissions can be received for life insurance products with the exception of life insurance implemented after 1 July 2014 for a member in a default superannuation or a group life policy in a superannuation fund.

There will be a 100% clawback of commission where the life insurance policy is cancelled, not continued or the policy cost is reduced in the first year and 60% clawback of commission in the second year.

If you choose to pay fee for service, we can rebate to you part or all of the commission we would otherwise receive for insurance arrangements.

In the interests of transparency, please understand that I will receive an upfront commission from the product issuer if you decide to buy a life risk insurance product I recommend to you. Commissions, whether up-front or ongoing, are paid to us by the Insurer.

I will receive an upfront commission of between 0% and 66% of the first year's annual premium, and then an annual ongoing commission of between 0% and 22% of the annual premium.

For example, for an insurance product with an annual premium of \$2,000, where the issuer pays me an upfront commission of 66%, I will receive \$1,320. The issuer will pay me 22% of the annual premium as ongoing commission for as long as you hold the product. Assuming an annual premium of \$2,000, this equates to \$440 per year.

## Potential Conflicts of Interest

### Ownership

Paragem is a wholly owned subsidiary of Easton Investments Limited, an ASX listed company that provides services to financial advisers and accountants in the areas of licensing, training, education and client engagement. Easton Investments Limited has a material shareholder, Hub24 Limited, which offers a leading investment administration and reporting platform to the Australian marketplace.



Paragem was previously owned by Hub24 as such if you use the HUB24 platform, some of Paragem's employees and representatives (our advisers) may benefit financially by virtue of being shareholders in the company. This is disclosed below, where applicable.

We are obliged to always act in a client's best interests and will only recommend the use of the HUB24 platform if it is appropriate to do. We also continue to use other platforms to implement our investment advice and you are free to request your adviser use an alternative platform if you would prefer.

## Referral Payments

### Referrals from a third party

We have arrangements in place to pay a referral fee, commission, or other benefit to certain third parties when they refer new clients to us. Our current arrangements for referrals from a third party are set out in the table below and specific details of any benefit we provide in relation to our advice to you will be included in the advice documentation we provide to you.

**Table - Details of arrangements for referrals from a third party:**

Name of referral partner	Payment we provide for the referral	Example
<b>Indigo Financial Pty Ltd</b>	20% of upfront and ongoing fees	If you are referred by Indigo Financial Pty Ltd and you utilise our services they would receive 20% of any fees you pay to Proxima Financial Planning. For example if you paid \$4,000 for initial advice Indigo Financial Pty Ltd would receive \$800 for referring you to Proxima Financial Planning.

### Referrals to a third party

We have referral arrangements in place with third party providers. If we refer you to one of these providers we may receive a payment, fee, commission or other benefit from those providers.

Details of these arrangements are set out in the table below and specific details of any referral payments we may receive will be provided in our advice documents to you. Alternatively, you can request further details about our referral arrangements prior to us providing you with financial advice.

**Table - Details of referral arrangements in place:**

<b>Name of referral partner</b>	<b>Services</b>	<b>Payment we will receive for referral</b>	<b>Example</b>
<b>View Legal Pty Ltd</b>	Legal Services	Nil payment is received from View Legal Pty Ltd for referral. Proxima Financial Planning may charge a facilitation fee and request remuneration of the relevant legal invoice.	Facilitation fee charged @ \$440 per hour x 2 hours - \$880 (refer FSG v14).  Legal fee for entry level, single, Will and Attorney documents (charged by View Legal Pty Ltd) - \$350  Total invoiced - \$1,230 inc GST

Please note that Proxima Financial Planning is not responsible for the advice and services provided by these providers.



## Privacy Statement

The privacy of your personal information is important to us.

Paragem and we will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. The ways we do this include:

- To protect your interests, we will take reasonable steps to protect the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. limiting physical access to our premises;
- limiting access to the information we collect about you (for instance, only those of our personnel who need your information to carry out our business activities are allowed access and committee members only have access to the contact details of members of their own committee and not other committees);
- requiring any third party providers to have acceptable security measures to keep personal information secure; and
- putting in place physical, electronic, and procedural safeguards in line with industry standards.

If we no longer require your personal information and are not legally required to retain it, we will take reasonable steps to destroy or permanently de-identify the personal information.

### **1. Your representative will ask you many questions. Why is so much information required?**

We collect your personal information to enable us to provide you with the products and services that are appropriate to your needs. We are required by law, including the Corporations Act and Taxation laws to collect personal information before we provide you with advice and services. You are not obliged to provide the information we request but, if you do not, we may not be able to provide you with advice or services.

From time to time other laws, regulations or directions may also require, or authorise, us to collect personal information.

We prefer to obtain information from you directly and will generally gather the information we require by asking you questions about you and possibly your family. We will record this information. We endeavour to retain accurate, complete and up to date personal information about you, so we will ask you to review the information from time to time.

If the information you provide to us is incomplete or inaccurate this will impact on our analysis of your requirements and may result in advice that is not appropriate to your needs and circumstances. If this does occur, you will need to make your own assessment concerning the appropriateness of our advice.

At times, we may collect personal information from someone other than yourself and you may not be aware that we collect or have collected this information.

## **2. Access and correction**

You may (subject to permitted exceptions) access, update or correct your information by contacting us. If we are unable to provide you with access to your information, we will provide you with the reasons for our position. We will endeavour to ensure that the personal information we retain about you is up to date and accurate. Please appreciate that the accuracy of the information we retain is dependent to a large degree on the information you provide, so please advise us if there are any errors or omissions.

## **3. Providing personal information**

We may provide personal information to:

- organisations (who are bound by strict confidentiality) to whom we outsource certain functions, such as our auditors (in these circumstances, information will only be used for our purposes);
- other professionals, such as solicitors, accountants, stockbrokers and mortgage brokers, as well as other advisers specialising in aged care, Centrelink, insurance or investment when a referral is required;
- entities based overseas (see below for details); or
- third parties when required to do so by law, e.g. legislation or Court Order.

## **4. Overseas disclosure**

Sometimes we need to provide personal information to or get personal information about you from persons located overseas. For example, we may outsource a function involved in the financial planning business to someone based overseas. Nevertheless, we will always disclose and collect your personal information in accordance with Privacy Principles.

## **5. Identifiers**

Although in certain circumstances we are required to collect government identifiers such as tax file numbers, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

## **6. Dealing with us anonymously or using a pseudonym**

The nature of the provision of financial services does not lend itself to treating customers with anonymity. All transactions require personal information about the individual for whom the transaction is being completed.

In some instances, we may be able to provide information or a service anonymously or to you under a pseudonym, for example, enquiries about products from a potential client.

You can deal with us anonymously only where it is lawful and practicable to do so.

## **7. Marketing practices**

Every now and then we might let you know about news, products and services that you might be interested in, via mail, email, SMS, telephone or online. We will do so unless you tell us that you are not interested in receiving this information. You can contact us at any time to update your marketing preferences.

## **8. Sensitive information**

We will not collect sensitive information about you, for example where information is provided by you for insurance or risk purposes, without your consent. Exceptions to this include where the information is required by law or for the establishment, exercise or defence of a legal claim.

## **9. Privacy complaints**

If you believe your privacy has been breached or you have a privacy complaint you should write to the Privacy Officer at Paragem, by email at [info@paragem.com.au](mailto:info@paragem.com.au) or at GPO Box 4463, Sydney NSW 2001.

If Paragem does not satisfactorily address your complaint you can escalate it to the Office of the Australian Information Commissioner: [www.oaic.gov.au](http://www.oaic.gov.au).



## **10. Our Privacy Policy**

If you require more information, please ask for a copy of our Privacy Policy or refer to current version of this Privacy Policy on Paragem's website ([www.paragem.com.au](http://www.paragem.com.au)). This Privacy Policy will be reviewed from time to time to take account of new laws, technology, changes to our operations, practices and the changing business environment.