



Aqua Wealth  
2/169 Pascoe Vale Rd  
MooneePonds VIC 3039  
(03) 9373 0400  
[www.aquawealth.com.au](http://www.aquawealth.com.au)

# Financial Services Guide

1 February 2021 | Part 2 | Version 3

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## Authorised Representative Profile Frank D'Alessandro

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, Frank D'Alessandro, 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.



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Your adviser is Frank D'Alessandro ("Frank"), an Authorised Representative of Paragem.

Frank's ASIC Authorised Representative number is 263 156.

Frank has extensive experience in the financial planning industry.

He has been a Financial Adviser since 2002, offering advice to individual clients as well as small and large business clients.

Prior to Paragem, Frank was a Financial Adviser with various financial organisations, including Securitor, Financial Planning & Life and Wealth Protection Advice Group.

Frank has an association with Aqua Wealth Pty Ltd (ABN 13 790 630 575) as a Director. Fees and commissions are paid to Aqua Wealth Pty Ltd by Paragem for distribution to Frank.

Frank D'Alessandro's employer is Aqua Wealth Pty Ltd, which is a Corporate Authorised Representative (CAR no.410879) of Paragem.

Frank holds a Diploma of Financial Services (Financial Planning), Diploma of Financial Services (Mortgage Broking), Advanced Diploma of Financial Services (Financial Planning), a Graduate Diploma in Management, Aged Care Specialist Accreditation and a Self-Managed Superannuation Fund Accreditation.

Frank 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
- Margin Lending

Frank D'Alessandro is not authorised to recommend any strategy that involves an agricultural scheme investment, direct property, derivatives and unregistered managed investment schemes.



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## 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 Aqua Wealth Pty Ltd 100% of the fees and/or commissions detailed in this schedule. Paragem will charge Aqua Wealth Pty Ltd for licensee services and is not linked to client revenue. Frank D'Alessandro is a director of Aqua Wealth Pty Ltd and is remunerated by salary and distributions from Aqua Wealth Pty Ltd.

## 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.

Advice fees are inclusive of GST (unless otherwise stated) and may be payable at the following stages:

	<b>Recommendation Fees:</b> For having a personalised financial plan (SoA) prepared, a plan preparation fee (up to \$16,500) is payable. The actual fee will depend on the complexity of your situation and the time it takes to prepare personal financial advice for you.
	<b>Implementation Fees:</b> I may charge a placement fee and/or implementation fee to implement the recommendations in your financial plan, ranging from \$1,980 to \$16,500.  A. \$275 per hour; or B. the maximum of entry fees or contribution fees specified in the Product Disclosure Statement (PDS) for the recommended product;
	<b>Ongoing Advice Service Fees:</b> If you choose to have me review your financial plan to ensure that your financial strategies and financial products remain appropriate to you, you may be charged an ongoing service fee. This fee can range from \$2,640 to \$19,800 based on complexity

**Note:** Full details of all fees and commissions for financial services will be provided to you in a Statement of Advice (SoA), or Record of Advice (RoA) and Product Disclosure Statements (PDS) at the time of receiving any recommendation.



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## 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 will be disclosed to you in Part 2 (this document) of the Financial Services Guide which outlines specific information relating to your financial adviser and the Statement of Advice if you wish to receive advice.

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

We do not receive any form of referral payments. I may inform you that Aqua Wealth Financial Services Pty Ltd is able to provide particular credit activities. If you use the services of Aqua Wealth Financial Services Pty Ltd, I will not receive any upfront or ongoing commission from this referral.



## 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, Standards Australia 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.



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## **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.