



# Financial Services Guide

**Version 1.2**

**Date: 15 April 2021**

# Important Information about our Licensee

## Financial Services Guide

IMFG Pty Ltd, ABN 18 646 084 666, is an Australian Financial Services Licensee (no. 527657) that provides advice and services to help successful people make smarter financial decisions.

We are authorised representatives of IMFG Pty Limited (“IMFG”) of Level 8, 171 Clarence Street, Sydney NSW 2000. IMFG can be reached on 02 9002 0570 or at [info@imfg.com.au](mailto:info@imfg.com.au).

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:

- the services and types of products we’re able to offer you
- how we and our associates are paid and any other benefits we may receive
- any potential conflicts of interest we may have
- how we protect your privacy and handle your personal information
- how we resolve disputes, and what you should do if you have one.

Please read through the whole FSG, as it’s full of useful information – and is also worth holding on to for future reference. The Privacy Notification on page 12 is worthwhile reading as it gives you further clarity on how we handle your personal information. And of course, if you ever have any questions, please contact us.

## Other documents you may receive

In addition to this FSG, if we provide you with financial advice we will also present you with a written record of our recommendations – either a Statement of Advice (SOA) or a Record of Advice (ROA) depending on the circumstances.

This will record:

- the strategies and products 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.

You can request a copy of this by contacting us any time up to seven years from the date of the advice provided.

To help you make an informed decision about a financial product you generally will be given a Product Disclosure Statement (PDS) which outlines the product features and costs in detail.

## Giving us instructions

If you want 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.

Generally, you will need to give us instructions in writing (eg email or letter) or another method agreed with us.

## Our associations and relationships

IMFG Pty Limited has no association with, and is not owned by, any product issuer but, because we receive commission from life insurance companies, neither we nor IMFG can refer to ourselves as ‘independent’, ‘impartial’ or ‘unbiased’ or describe our services in that way.

As advice professionals we are committed to acting in your best interests and complying with, if not exceeding, the relevant laws and industry practices.

We generally recommend products that are listed on IMFG’s approved product list but, If these products are not appropriate for your circumstances, we may recommend a product outside of this list. You can view a copy of our approved product list, upon request.

# About us

## Who we are

IMFG was formed to help successful people improve their quality of life and peace of mind by making smarter financial decisions. IMFG has authorised the following people as their representatives.

The Financial Services we offer are provided by Identity McIntyre Pty Ltd ACN 162 104 716 ATF the Identity McIntyre Financial Group Unit Trust ABN 72 833 922 958 trading as IMFG. Identity McIntyre Pty Ltd is a Corporate Authorised Representative (No. 461171) of IMFG Pty Limited.

IMFG has authorised the following people to provide financial advice and services under their AFSL and IMFG is ultimately responsible for their conduct and the content of this FSG:

Angus Dockrill  
Authorised Representative No. 404746

Scott Douglas  
Authorised Representative No. 407491

Dan Blatch  
Authorised Representative No. 434362

Lisette Walsh  
Authorised Representative No. 290055

Matthew Bull  
Authorised Representative No. 430771

Sangram Rana  
Authorised Representative No. 1251526

Vince Dore  
Authorised Representative No 273268

John Foley  
Authorised Representative No 242178

Star Financial Services ACN 100 257 921 ATF Star Capital Management Trust ABN 28 056 426 932 trading as Star Financial Services is a Corporate Authorised Representative (No. 242365) of IMFG Pty Limited

IMFG Pty Limited has authorised us to provide you with this Financial Services Guide.

## **What we do**

We are authorised by IMFG Pty Limited to provide financial advice in relation to:

- Wealth Accumulation
- Income & Asset Protection
- Tax Strategies
- Superannuation
- Retirement & Redundancy Planning
- Estate Planning
- Government Benefits
- Debt Management

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

- Basic Deposit Products
- Non-basic Deposit Products
- Non-cash Payment Facilities
- 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

We are not authorised to provide taxation advice or any other financial services or financial products.

Where we cannot provide you with a financial service or financial product that you require, we will advise you of this and refer you to an alternative source of advice.

## **Contact us**

For more information on anything you have read in this FSG, to obtain a copy of IMFG's Privacy Policy or to obtain additional information about either us or IMFG, please contact us at:

POSTAL ADDRESS:  
GPO Box 4315  
Sydney NSW 2001

OFFICE ADDRESS:  
Suite 803, Level 8  
171 Clarence Street  
Sydney NSW 2000

02 9002 0570  
info@imfg.com.au

# Your confidence in our advice

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 received, or other aspects of our service, please follow the steps outlined below.

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

**Phone:** 02 9002 0570

**Email:** [info@imfg.com.au](mailto:info@imfg.com.au)

**In writing to:**

Advice Dispute Resolution Team  
IMFG Pty Limited  
Level 8, 171 Clarence Street  
Sydney NSW 2000

3. If your complaint isn't resolved within 30 days or to your satisfaction, then you may refer 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 (free call)

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

AFCA provides fair and independent financial services complaint resolution that's free to consumers. Time limits may apply to lodge a complaint with AFCA, so 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.

IMFG hold professional indemnity insurance that satisfies the requirements of Section 912B of the Corporations Act. This insurance also covers the conduct of our current and former representatives.

# Payments and benefits we receive

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:

- by direct invoice from us;
- in some circumstances, where possible, as a fee for advice that will be deducted from your investments as a one-off payment or in instalments;
- where applicable, via commission we may receive from a financial product provider when you commence an insurance contract and ongoing commission annually during the life of the insurance contract; 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.

Please refer to the “How we charge for our services” section of this FSG for further information.

## 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

Our representatives may attend conferences and professional development seminars that have a genuine education or training purpose. We may pay for the costs of their 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 our representatives 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 IMFG Pty Limited may charge you for the cost of providing this information to you.

## Sponsorship

IMFG does **not** receive cash payments from product providers to sponsor and attend training presentations, conferences and/or professional development days

## Referrals

**Referrals from a third party**

We do not have any referral arrangement in place to receive referrals from third parties in return for payment or other benefit.

**Referrals to a third party**

We do not have any referral arrangement in place to provide referrals to third parties in return for payment or other benefit. If this changes, we will make you aware of this prior to providing advice, or further advice, to you.

Please note that IMFG Pty Limited is not responsible for the advice and services provided by these providers.

# 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.

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<b>Initial consultation</b>	\$440 (unless waived by us)
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<b>Advice preparation</b>	<p>If you elect to pay us a fee for advice the following fees will apply. The fees will depend on the size of the investment portfolio and the complexity of the advice:</p> <p>The minimum fee charged is \$3,300 while the maximum fee is \$13,200</p> <p>For example, complex advice that contain multiple goals, strategies and/or tax structures including but not limited to; self-managed superannuation Funds, family trusts and companies, are likely to be charged closer to the maximum. Less complex advice that addresses limited goals, strategies and tax structures are likely to be charged closer to the minimum.</p>
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<b>Implementation</b>	<p>In order to implement the agreed portfolio, we charge an 'implementation fee' of up to \$2,200 depending on the size and complexity of the portfolio. The fees will depend on the size of the investment portfolio and the complexity of the advice:</p> <p>Portfolios less than \$500,000: Implementation fee of between \$1,100 and \$2,200 Portfolios in excess of \$500,000: Implementation fee of between \$2,200</p> <p>Please note: If you are a Private Client of IMFG we waive our implementation fee.</p>
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<b>Ongoing fee for advice</b>	<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.</p> <p>We charge an annual retainer for our ongoing advisory service, a service we call our <b>Private Client Service</b>. The minimum fee for our Private Client Service is \$6,600 pa while the maximum is \$66,000 pa or 1.5% of the value of the investment (whichever is higher), unless mutually agreed. The fee is deducted from your bank account, investment portfolio or credit card. The retainer is based on the complexity of your situation and the level of ongoing advice and service provided.</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>For example, for ongoing advice on an investment valued at \$440,000 the maximum ongoing fee would be \$6,600 pa. For ongoing advice on an investment portfolio totalling \$5m held across personal names, a family trust and self-managed superannuation fund the maximum ongoing fee would be \$26,400. For ongoing advice on an investment portfolio totalling \$30m held across personal names, a family trust and self-managed superannuation fund the maximum ongoing fee would be \$66,000.</p> <p>We reserve the right to charge a higher amount, with mutual agreement.</p>
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**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 \$6,600 pa while the maximum is \$66,000 pa or 1.5% pa 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 a 12-month Fixed Term Advice and Services Agreement, an investment valued at \$440,000 the maximum ongoing fee would be \$6,600 pa. For a 12-month Fixed Term Advice and Services Agreement on an investment portfolio totalling \$5m held across personal names, a family trust and self-managed superannuation fund, the maximum ongoing fee would be \$26,400 pa. For a 12-month Fixed Term Advice and Services Agreement on an investment portfolio totalling \$30m held across personal names, a family trust and self-managed superannuation fund the maximum ongoing fee would be \$66,000 pa.

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**Ad hoc advice**

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 \$550 will apply.

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**Execution only service**

Where we provide a financial service to facilitate buying or selling of a specific financial product as instructed by you, a one-off fee based on the complexity and scope of the instructions will apply. Typically, \$2,200 is charged for simple execution services and complex instructions may incur a maximum of \$9,900 .

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**Insurance products**

Where we arrange a life insurance product for you, the relevant insurer will pay an initial commission to us. The commission is calculated as a percentage of the premium paid (and may include health, occupational, frequency and modal loadings and policy fees, but excludes stamp duty).

Annual commission will also be paid when you renew your policy each year.

The rates of initial and ongoing commission will depend on the date the policy is issued and are set out in the table below:

<b>Date policy is issued</b>	<b>Initial Commission (% of annual policy cost including GST)</b>	<b>Ongoing Commission (% of annual policy cost including GST)</b>
Before 1 January 2018 or before 1 April 2018 (where the application was received before 1/1/18)	up to 130%	up to 33%
From 1 January 2018	up to 88%	up to 33%
From 1 January 2019	up to 77%	up to 33%
From 1 January 2020	up to 66%	up to 33%

We may receive commission at pre 1 January 2018 rates if:

- you increase your cover, add new cover or otherwise amend a policy purchased by you before 1 January 2018; and
- that policy amendment results in commission receivable by us, and
- that policy amendment is eligible for pre-1 January 2018 commission rates.

**Example** (all figures include GST):

You purchase the policy for \$1000 on 1 December 2019. We may receive an initial commission of up to \$770 (\$1000 x 77%) in the first year and ongoing commissions of \$330 per annum (\$1000 x 33%) for as long as you continue to hold the policy.

If you increase your cover on 1 July 2020 for a cost of \$500, we may receive an initial commission of up to \$330 (\$500 x 66%). The ongoing commissions on the additional cover may be up to \$165 (\$500 x 33%). This is in addition to the ongoing commissions of \$330 per annum when the policy was purchased. Total ongoing commissions payable to us may be up to \$495 (\$1500 x 33%).

Please note that the initial and ongoing commissions on life insurance products are paid to us by the product provider and are not an additional cost to you.

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# 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 covers us and tells 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 IMFG Pty Limited, please also refer to IMFG Pty Limited Privacy Policy available at <https://www.imfg.com.au/AboutUs/PrivacyPolicy-360/>.

## 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 can't 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 advisers 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 don't provide your information to us, we may not be able to:

- provide you with the product or service you want;
- 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.

## 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 advisers, paraplanners and organisations who work with us, including other members of the IMFG Group, 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;
- 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.

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 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 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 these complaints, by reading our Privacy Policy (or by contacting us) 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)