



Financial Services Guide

Authorised Representative: Stefano Duro

Version 5 | 05 July 2021

Not Independent

Bluewater Financial Advisers (Bluewater) and your adviser may receive commission based on your premium for the duration of time you hold an insurance policy, fees based on the volume of assets under advice and gifts and other non-monetary benefits. For these reasons, we are unable to refer to ourselves as 'independent', 'impartial' or 'unbiased'.



Tax (financial) adviser
25698970



About this guide

This Financial Services Guide (FSG) explains the financial services provided by Pure Private Wealth and your adviser (authorised through Bluewater Financial Advisors Pty Ltd | ABN 99 153 118 533 | AFSL 411846). This document is designed to help you make a fully informed decision about whether you want to use our services.

Please take the time to read this guide carefully. Sound financial advice is based on open communication. Understanding our services and our fees is the cornerstone of this communication. It's also important that you know who authorises your adviser, the nature of their associations and relationships and what to do if you have a complaint. If you have further questions, or if there is anything that isn't clear, please talk to your adviser or contact us.

This guide must be accompanied by an Adviser Profile which outlines your adviser's skills, qualifications and the services they are authorised to provide.

Contents

Pages:

1. Cover
2. Index
3. Introduction
4. About Pure Private Wealth
5. Our Values
6. About Founders
7. Getting Started
8. Before Receiving Advice
9. Provision of Advice
10. Fee's & Conflicts of Interest
11. General Advice
12. Statement of Pure Private Wealth (Privacy Policy)
13. Complaints

This guide contains information about:

- Information about BFA as an AFSL holder
- The documents you may receive
- Other forms of remuneration or benefits that exist
- Information about privacy (i.e. collection, use and handling)
- Our complaints procedure
- Our compensation arrangements
- Details of your Adviser and responsibilities for providing financial services
- What your Adviser is authorised to do
- Details on how you can instruct your Adviser
- All forms of remuneration received by your Adviser

Bluewater Contact Details:

- Bluewater Financial Advisors Pty Ltd | ABN 99 153 118 533 | AFSL 411846
- Level 57 MLC Centre Martin Place, Sydney, NSW 2000
- P: 1300 799 101
- E: info@bluewaterfinancial.com.au

Bluewater Financial Advisors (BFA) holds an Australian Financial Services Licence (AFSL) Number 411846 and authorises Financial Advisers under its AFSL. Our contact details are listed above. BFA is responsible for any advice you receive.

The purpose of this Financial Services Guide (FSG) is to help you make an informed decision about the services we offer and whether they are suited to your needs. This FSG also provides you with important information on how to engage with your Adviser.

This FSG is an important document which we are required to provide to you as a condition of our Australian Financial Services Licence (AFSL).

Bluewater Financial Advisors & Pure Private Wealth

Bluewater Financial Advisors Pty Ltd is a privately owned and operated Australian company that is not owned or associated with any Bank, Insurer or Funds Management business.

Bluewater is a Principle Member of the Association of Independently Owned Financial Professionals (AIOFP), an Affiliate Member of the Association of Financial Advisers (AFA) and The Tax Institute.

BFA is the Licensee that authorises SBRR Group Pty Ltd T/A Pure Private Wealth to provide advice to retail and wholesale clients and is ultimately responsible for the advice provided to you.

SBRR Group Pty Ltd T/A Pure Private Wealth is responsible for any Authorised Representatives operating under that business, to provide the following financial services on behalf of BFA:

1. provide financial product advice, and
2. deal in a financial product by arranging for another person to issue, apply for, acquire, vary or dispose of a financial product

Approved Product List

Your Adviser can provide advice on a wide range of financial products however, they are required to recommend those approved by BFA which can be found on the BFA Approved Product List (APL).

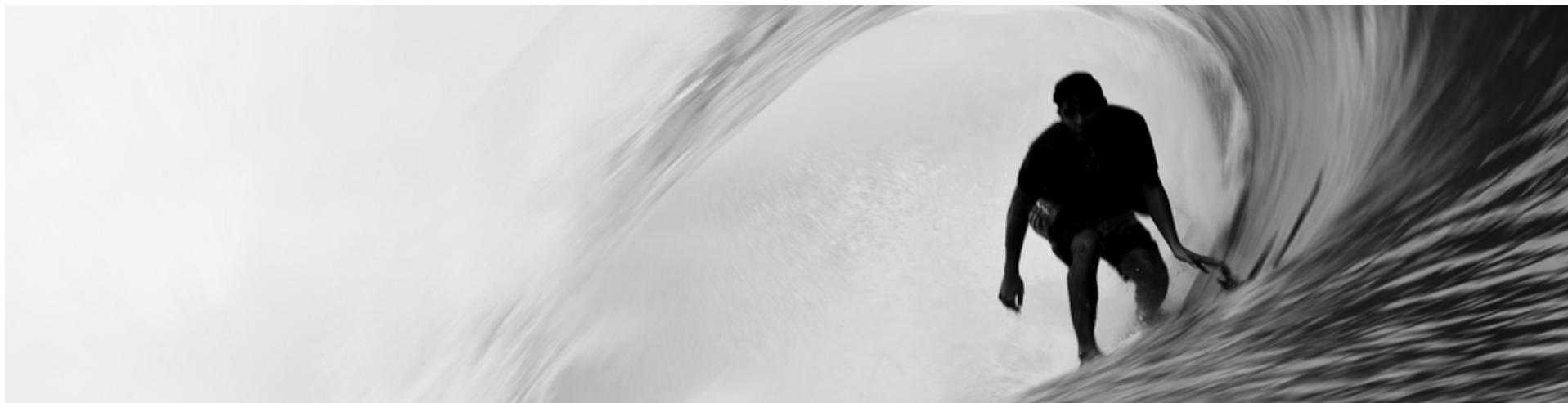
Your Adviser will assess whether the products on the APL (investment, superannuation and insurance) are suitable for you.

The APL is compiled by BFA and seeks to remove conflicts from the advice process (where possible).

You will be provided with a Product Disclosure Statement (PDS) or other disclosure documents (as available from the issuer), if we recommend a financial product.

Business Profile

- SBRR Group Pty Ltd Trading as Pure Private Wealth | Corporate Authorised Representative No. 1256525
- Stefano Duro | Authorised Representative No. 1239793
- PO Box 24 Pottsville Beach NSW 2489
- www.pureprivatewealth.com.au
- 1300 226 607
- admin@pureprivatewealth.com.au





About Us

Pure Private Wealth is a financial advisory practice, specializing in providing tailored advice, coaching, and financial services to people across Australia.

We pride ourselves on providing holistic advice based on a thorough knowledge of our client's goals, objectives, financial situation and ability to sustain financial risk.

We are a privately owned and operated Australian company.

Our Story

Pure launched in 2017 with a big vision – to innovate the way people receive financial advice across Australia.

Today, we are one of Australia's most innovative personal advice practices, encompassing a team of highly motivated individuals who help you achieve your personal life goals.

We deliver interactive goals based financial advice – a highly visual client co-creation experience designed to help you understand your money and goals.

GOALS are the guide of all limitations. We keep our you focused on goal-oriented outcomes and celebrate the milestones along the way.

Our Mission

We're on a mission to empower Millennials, Gen X's and Boomers live more fulfilling lives by aligning **life goals and personal values** to strategic and attainable outcomes.

To continually adapt Pure to think big by innovating our practice to continue delivering goals driven and outcome focused advice to our clients using today's technology.

We have a goal for financial advice to have greater meaning with goals-based-advice by engaging you with your goals and **vision for the future** with a strategic plan to get you where you want to be.

Our Core Values



Think Big

Think big, grow big. We believe change starts in your mind and it takes thinking big to understand how to get there.



Goals Driven

We believe it starts with a dream and g.o.a.l.s are our guide of all limitations on the journey to reaching a desired outcome.



Outcome Focused

It starts with a dream. Your goals maintain our focus at all times and we're right beside you to adjust your sail and celebrate milestones along



Always Innovating

Our promise to always look for and continue to adjust in a world that is always innovating as we work towards achieving your dreams.



PURE FOUNDERS



Stefano Duro

Founder, Managing Director, Principal Adviser

Stefano Duro is a goal-oriented entrepreneur and financial adviser who is also known as the Gary-Vee of Goals Based Advice in Australia. In October 2020, Stefano was recognised at the Independent of Financial Adviser Excellence awards as top 10 finalist for goals-based financial adviser across Australia.

His ambitions to innovate the way people receive financial advice, led Pure Private Wealth to be one of the first companies in Australia to digitalise the way they deliver advice and interact with clients.

Stefano's experience practicing as a goals based advice financial adviser has seen him help people identify, manage and track client's life goals to achieve new heights and live a happy and fulfilling life.

A big goal-setter himself, Stefano practices what he preaches. He has a natural tendency to educate, inspire and empower his client's to work towards their goals.

Danielle Soppa

Founder, CEO, Head of Client Care

Danielle is a freedom seeking entrepreneur, game-changing mentor for women in business, a money & mindset mentor & the co-founder of Pure Private Wealth in 2017.

Originally from Canada, Danielle has studied formal education in Business at Dalhousie University and also completed her Canadian Securities Course (CSC) but acknowledges the power of self-education, mindset, discovery and discipline to be the root of her successes.

Her drive in life is to empower others to live their best life and go after their goals. Danielle speaks about Money & Mindset in podcasts, online events and interviews regularly to share her thoughts and inspire people to discover their inner potential.

WHO IS YOUR ADVISER ?

Your adviser is an employee of Pure Private Wealth, and an Authorised Representative of Bluewater Financial Advisors Pty Ltd.

WHO IS YOUR FINANCIAL COACH ?



Stefano Duro

Authorised Representative: **1256525**.

Stefano Duro qualifications are as follows:

- Diploma in Financial Services (Financial Planning)
- Registered Tax (financial) adviser (No. 25697842)
- Specialist knowledge in Self-Managed Superannuation Funds

Further details about Stefano's experience can be found on the Financial Adviser Register on the ASIC website.

Your adviser is authorised to provide Personal Advice and deal in the following financial products:

- Deposit and payment products (Deposits and payment products, non-basic Deposit Products)
- Government Debentures, Stocks or Bonds
- Life Products (Investment Life Insurance Products, Life Risk Insurance Products)
- Managed Investment Schemes (Managed Investment Schemes, IDPS)
- Retirement Savings Account Products
- Superannuation (incl. Self-Managed Superannuation Funds)
- Securities

You can contact your Adviser directly with any instructions and provide them in writing, by email or by confirming verbal conversations.





Will we provide you with advice suitable to your needs and financial circumstances?

Yes. To provide quality advice, you need to supply us with your individual goals and objectives, your financial situation and your needs. You have the right not to divulge this information; if you do not wish to do so then we are required to warn you about the potential consequences of us not having your full personal information prior to providing advice. In some cases, we will have to decline giving advice entirely. You should read the warnings carefully and ask our Authorised Representative about these consequences if you are unsure.

What should you know about the risks of the financial products or strategies we recommend to you?

Your adviser will explain to you any significant risks related to the financial products and strategies recommended to you. You should also read the product disclosure statement along with any recommendations to make a fully informed decision.

What information do we maintain in your file and can you examine your file?

Pure Private Wealth will maintain a record of your personal profile, which includes details of your goals and objectives, financial situation, needs, copies of recommendations made to you and any products acquired by you.

Internal member databases are maintained, and portfolios are reviewed on a regular basis subject to your membership agreement.

If you wish to examine your file, we ask that you make this request via email to: admin@pureprivatewealth.com.au and allow up to fourteen (14) working days for the information to be forwarded.

You may be charged a fee to cover the cost of preparing any material requested (unless it is included in your Pure Plan Package). If the information sought is extensive, you will be advised of the likely cost in advance and can help to refine your request if required.

Personal advice

Before we can give you advice, which is appropriate and in your best interests, you will need to give us details of your personal objectives, current financial situation, needs and any other relevant information.

You can choose not to provide us with this information, but any advice we give you will be general in nature and may not be appropriate to your objectives, financial situation and needs.

If you are a retail client, you should read the warnings contained in the SoA carefully before making any decisions relating to a financial product.

If we give you personal advice, we will maintain a record of your personal profile, including details of your objectives, financial situation and needs.

We will also maintain records of any recommendation made to you. For information on how to access personal information about you, please refer to the section 'Your Privacy' below.

We will only give personal advice to you if you secure the services of one of our representatives.

When you are provided advice, your adviser is required to comply with the Best Interests Duty and will always act in your best interest.

Other documents you may receive:

Statement of Advice (SoA)

Unless you're a Professional Investor, Sophisticated or Wholesale Client any financial advice we provide to you will be confirmed in writing in either a Statement of Advice (SoA) or a Record of Advice (RoA).

In these cases, unless we warn you otherwise, our advice will consider your personal circumstances, needs and goals. You should read the SoA or RoA carefully, to ensure that you fully understand any recommendations we make.

Do not implement our advice unless you do.

When will you receive a Compliance Documents / Statement of Advice (SoA)?

The information will be recorded in a Client Discovery by your Adviser and you will be asked to be confirmed by you in your Pure a.i Portal and signed in a declaration form so you are sure it accurately reflects what was discussed.

Initially, your advice will be documented in a SoA, which will detail and consider your current financial situation and requirements.

The SoA provided will outline:

- What the advice covers (the scope).
- Details of why you are seeking advice (i.e. your goals and any specific requirements). Your personal circumstances (financial, health and anything else relevant to the advice). The advice itself and any recommendation being made (strategic and/or financial products) plus the advantages, disadvantages and any risks involved.
- Any payments to us (fees, commissions or other benefits) and how that is determined. Any associations we have that may influence the advice provided to you.

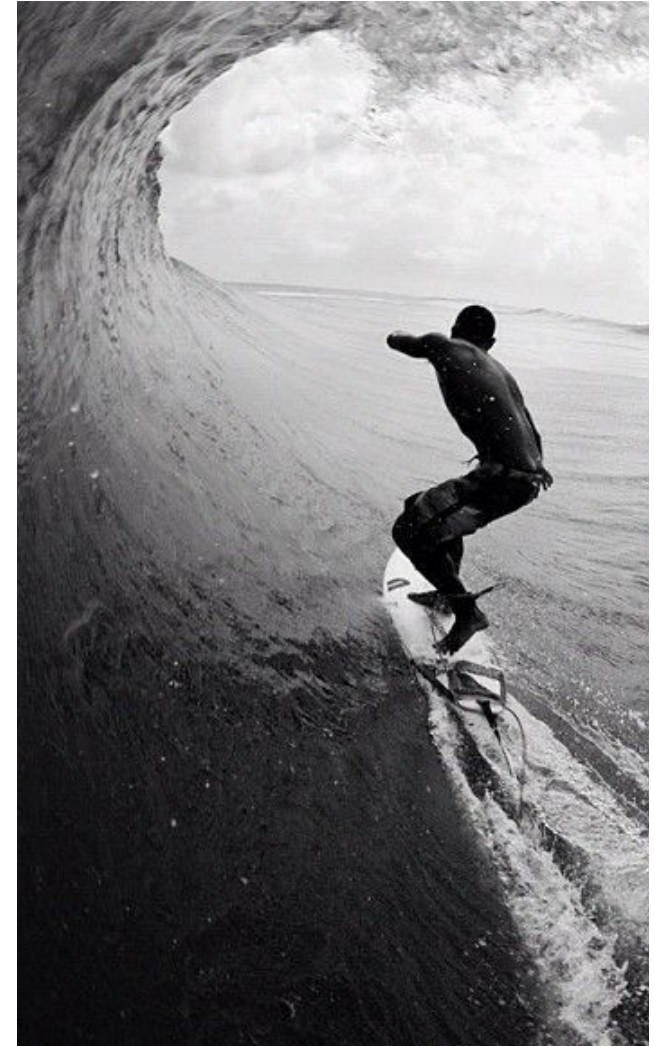
If you receive advice in the future, your Adviser will provide you with a subsequent SoA or a Record of Advice (RoA) (depending on the complexity of the advice). We are required by law to keep copies of any RoA or SoA for a minimum of seven years.

When your adviser makes a recommendation to acquire a financial product, you must also be provided with a **Product Disclosure Statement** from the issuing product provider which gives full details of the recommended product to assist in making an informed decision to acquire that product. You should receive and review the PDS (or other offer document) provided by us before you make an investment decision about our products, or a product we recommend.

You should read the information and warnings contained in the SoA or other advice documents carefully before making any decision relating to a financial product or advice.

Can you tell us how you wish to instruct us to buy or sell your financial products?

Yes. You may specify how you would like to give us instructions, for example by telephone, email, or other means or specify how the instructions are to be given.



PROVISION OF ADVICE FEE'S & CHARGES

How will you pay for the services provided?

Your adviser may charge you a fee for providing Advice and/or Financial Services. The amount and how you choose to pay for the it may vary based on whether it is a fixed fee, commission, or combination of those. 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.

How Does Pure Private Wealth Get Paid:

Pure Private Wealth pays a fixed fee to Bluewater Financial Advisors Pty Ltd, Bluewater Financial Advisors Pty Ltd consequently pass 100% of the gross revenue generated via advice fees and commissions to Pure Private Wealth. Any fees, charges or commissions payable to BFA will be disclosed in advice documents provided to you.



Advice preparation:

The advice preparation fee will depend upon the complexity of the advice being provided; the minimum fee charged is \$2,200 while the maximum fee is \$22,000. Should this fee exceed the maximum, it will be outlined and accepted by you in an agreement prior to advice being delivered.

Adhoc advice:

Where you do not wish to participate in an ongoing service fee arrangement but require ongoing advice on a fee for service basis, an hourly fee of \$550 may apply.

Ongoing fees for advice:

If you elect to pay a fee for the ongoing review and management of your financial planning strategy, the fee is based upon which package you've been recommended, and the complexity of ongoing advice and the services provided.

If you elect to have ongoing investment management, advice and services, you may be charged a flat based fee or an asset based fee calculated at 2.2% of assets under management.

Our ongoing investment fee is an aggregated fee structure and how much you have invested with us will depend on what ongoing service package you are eligible for.

If you elect to have ongoing financial cash flow and coaching management, your fee will depend on which service package is required to meet your needs and agreed by you.

The minimum of our ongoing fee is \$1,200 pa per person and our maximum ongoing fee is \$22,000 p.a per person.

All disclosed fees are inclusive of GST.

Your Adviser will provide you with a Fee Disclosure Statement (FDS) each year if you have an ongoing fee arrangement with us. It will outline the fees you paid, and the services received and the services you were entitled to receive in the preceding 12 months. You should let your Adviser know within 120 days of your anniversary date of your choice to continue the arrangement. If you elect to end the arrangement, we have an obligation to stop all ongoing fees as outlined in your FDS.

Insurance products:

(2020) 60% of the premium in the first year of the policy with a maximum trailing commission of 20%.

If the policy lapses in the first year 100% commission is clawed back, and 60% clawed back in the second year. Your adviser will charge you a fee equivalent to the value of the clawback in the event your policy lapses and they are not paid for their services. Any fees, charges or commissions are payable to BFA and will be disclosed in the advice documents provided to you.

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. If we cannot provide this accurately, we will provide worked-dollar examples.

Brokerage:

Pure may charge a 0.50% brokerage fee.

Referral Fees and Commissions:

We do not receive referral fees. We receive commissions in relation to insurance products only and we disclose these commissions to you in your Statement of Advice.

Conflicts of Interest

Do we have any association or relationship with a Financial Product Provider?

As your Adviser, I do not have any relationships nor receive any conflicted remuneration that may influence the advice provided to you.

Additional Benefits and Incentives:

Pure Private Wealth and our Authorised Representatives may receive additional benefits from product providers we deal with. These will include sponsorship for making available professional development to our Authorised Representatives and may include lunches, invitations to sporting events, theatre tickets, branded promotional items, and occasional gifts such as Christmas hampers on special occasions, etc.

General advice

When we provide you with general advice it is general in nature and does not take into account your objectives, financial situation or needs.

You should consider whether the advice is suitable for you and your personal circumstances.

Before you make any decision about whether to acquire a certain product, you should obtain and read the relevant product disclosure statement.

If we provide 'general advice' to you, it is important to remember that this 'general advice' does not take account of your objectives, financial situation or needs. Therefore, it is recommended that you take all reasonable steps to fully understand the outcomes of specific products and strategies adopted in relation to utilising the services provided by Pure Private Wealth.

Pure Private Wealth can provide you with an execution-only service and/or may provide you with general advice in relation to the authorised financial products.

Pure Private Wealth can help you meet your financial objectives by providing a full range of financial services, including access to company research from our experienced research analysts.

We recommend that you seek personal financial advice, so that your advisor has a full picture of your financial situation and is able to create advice that is appropriate for your individual situation.

You can give instructions to us in any of the following ways:

- by the telephone (note your telephone calls to us may be recorded);
- in writing (including email, note you must confirm with us that such instructions have in fact been received by us as electronic communications may fail or not be received in a timely manner); and
- electronically via direct entry into trading systems that we provide access to you.





Privacy Policy

Pure Private Wealth is committed to ensuring the confidentiality and security of the information provided by you to us. We support and embrace the National Privacy Principles set out in the Privacy Amendment (Private Sector) Act 2000 and the protection afforded by this act for the security of private information held on ordinary Australians.

You may be requested to provide us with information about your personal circumstances and anything else relevant to enable us to provide appropriate advice to you. AUSTRAC requirements mean that your Adviser will need to confirm your identity by sighting and verifying documents such as your Passport and Driver License.

We will also collect information from you to meet our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act. We will generally collect this information directly from you however in some cases we will seek your authority to collect if from other parties such as your accountant or your superannuation fund. If you do not provide us with all the information that we request, we may not be able to provide our services to you.

All personal information we gather from you, as well as any advice provided to you is maintained in a file. We only keep your Tax File Number and sensitive personal information if we have your written permission. If you would like to examine your personal information, please let your Adviser know.

We will hold and use your personal information so that we can continue to provide our services to you. We will only disclose your personal information to external parties where: The law requires us to do so, you consent for us to do so, consider whether there are other parties where there may not be consent. If you have any complaints about how we handle your private information, please contact a member of Pure Private Wealth by phone on 1300 226 607 or email admin@pureprivatewealth.com.au.

We take your privacy seriously and will address your concerns through our complaints handling process. A full copy of our Privacy Policy is available on our website: www.pureprivatewealth.com.au

If you believe you do not receive a satisfactory resolution to your concern, you may contact the Office of the Federal Privacy Commissioner. The web site of the office of the Federal Privacy Commissioner: www.privacy.gov.au.

Complaints:

Who can you contact if you have a complaint about the provision of the financial services to you?

We endeavor to provide you with the best advice and services – always. If you are not satisfied with our services, we encourage you to contact us at our office or put in writing via email to admin@pureprivatewealth.com.au and tell us about your complaint.

How we handle complaints

We are committed to providing you with quality advice. If you are unhappy with our services, we would like you to tell us about it and let us know how you think we can fix it.

If you have a complaint about the service provided to you, you should:

Contact your adviser

Contact Bluewater Financial Advisors at the office on 1300 779 101

Alternatively, if you prefer to submit a written complaint, please do so to:

The Complaints Officer

GPO Box 4523

Sydney NSW 2000

E: info@bluewaterfinancial.com.au

We will acknowledge receipt of a complaint within 24 hours (or one business day), however, where this is not possible, acknowledgement will be made as soon as practicable.

Your complaint will be assessed, and you will be advised of the outcome, either by telephone or in writing.

If any issue has not been resolved to your satisfaction, you can lodge a complaint with the Australian Financial Complaints Authority, or AFCA. AFCA provides an independent financial services complaint resolution that is free to consumers.

You may lodge a complaint with AFCA if:

Your complaint relates to a Bluewater service; and You are not satisfied with our response after 30 days.

Bluewater is a member of AFCA, you can contact AFCA via the following, quoting membership number 28547.

Australian Financial Complaints Authority

GPO Box 3, Melbourne VIC 3001

Tel: 1800 931 678 (free call)

Email: info@afca.org.au

Website: www.afca.org.au

Complying Compensation Arrangements

As Pure Private Wealth is an Authorised Representative of Bluewater Financial Advisors, we are provided with Professional Indemnity Insurance. BFA has Professional Indemnity Insurance in line with legislative requirements. This includes coverage for claims in relation to the conduct of current and former Advisers (no longer authorised by BFA). If you would like more information, please contact us.

