

# Privacy Policy

Toulios Wealth Management Pty Ltd · ACN 667 133 977 · ABN 68 667 133 977  
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## 1. Who we are

Toulios Advisory Group is the trading name of Toulios Wealth Management Pty Ltd, a senior Australian management consulting firm. This Privacy Policy explains how we collect, use, store and disclose personal information when you interact with us, our website ([toulosadvisory.com](https://toulosadvisory.com)), our AI Strategist agent, and any service we provide.

## 2. The Australian Privacy Principles

We handle personal information in accordance with the Australian Privacy Principles (APPs) set out in Schedule 1 of the Privacy Act 1988 (Cth). This Policy is the plain-English summary; the binding standards are those of the APPs themselves.

## 3. Information we collect

We collect only the information we need to do the work you have engaged us to do, or to respond to your enquiry. Typical categories: name, business name, role, email address, phone number, business stage, engagement goals, the content of messages and voice calls you choose to send us, and anonymised analytics such as which pages you read.

## 4. The AI Strategist agent

When you initiate a call with our AI Strategist agent, the conversation is recorded, transcribed and analysed by our third-party voice AI provider (Fireflies.ai). The transcript is reviewed by a senior consultant at Toulios who then prepares your plan. Transcripts are retained for 24 months and then permanently deleted. You can request earlier deletion at any time by emailing [privacy@toulosadvisory.com](mailto:privacy@toulosadvisory.com).

## 5. How we use your information

We use your information to: respond to enquiries, deliver our services, send you scoped follow-ups about the engagement, comply with our tax and audit obligations, improve our website and service quality, and (only with your separate, granular consent) provide anonymised analytics.

## 6. Sub-processors

We rely on a small number of independently audited third-party processors: Fireflies.ai (voice AI), SendGrid/Twilio (transactional email), MongoDB Atlas (encrypted storage, Sydney region), and Emergent Cloud (application hosting, PostHog analytics). Each is contractually bound to our privacy standards. Their respective privacy policies are linked from our Trust & Privacy page.

## 7. Security

Data is encrypted in transit (TLS 1.3) and at rest (AES-256). Database access is restricted by IP allowlist and role-based credentials. We do not store payment card information; payments (where applicable) are processed by accredited payment providers under PCI-DSS.

## 8. Retention

Booking, contact and engagement records are retained for seven years to satisfy tax, audit and professional obligations. AI Strategist call transcripts are retained for 24 months. Anonymised analytics events have no personal identifiers and are retained indefinitely for trend analysis.

## 9. Your rights

You may request access to, correction of, export of, or deletion of any personal information we hold about you. Email [privacy@toulosadvisory.com](mailto:privacy@toulosadvisory.com). We action requests within 30 days under the APPs, typically within five business days. If you are unsatisfied with our response, you may contact the Office of the Australian Information Commissioner at [oaic.gov.au](http://oaic.gov.au).

## 10. Cookies

We use a small set of cookies. Essential cookies keep the site functioning. Anonymised analytics cookies, and functional cookies that remember your preferences, are only set with your separate consent (configurable via the cookie banner on first visit and reachable at any time via the Trust & Privacy page).

## 11. International transfers

Some of our sub-processors are based outside Australia (United States). Where personal information leaves Australia, we ensure the recipient is bound by contractual obligations consistent with the APPs.

## 12. Changes to this Policy

We may update this Policy from time to time. The version and effective date appear at the top. Material changes will be notified via a banner on the website for at least 30 days.

## 13. Contact

Privacy enquiries: [privacy@toulosadvisory.com](mailto:privacy@toulosadvisory.com). General enquiries: [hello@toulosadvisory.com](mailto:hello@toulosadvisory.com). Postal: Toulos Wealth Management Pty Ltd, Sydney, Australia.