

# Financial Services Guide and Adviser Profile

Version DEA1.00



## **Cloudy Holdings Pty Ltd**

ABN: 36 662 383 940

Australian Financial Services Licensee No: 543481

Head Office: Allinsure Building, Ground Floor, 18/2  
Yallourn Street, Fyshwick, ACT 2609 AUSTRALIA

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## **Sean Morton**

Authorised Representative No. 1251404

ABN: 57 614 676 201

Trading As See Clear Wealth Pty Ltd  
of Cloudy Holdings Pty Ltd

Office: Unit 18, 2 Yallourn Street, Fyshwick ACT 2609

Mobile: 0412 972 144

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Website: www.seeclearwealth.com.au

## PART 1 – FINANCIAL SERVICES GUIDE

This Financial Services Guide (FSG) is issued by **Cloudy Holdings Pty Ltd** ABN 36662383940 AFSL 543481, referred to as **Cloudy Holdings Pty Ltd**, “we”, “us”, and “our”.

**Cloudy Holdings Pty Ltd** is a diversified financial services group that provides wealth management and stock broking licensee services. **Cloudy Holdings Pty Ltd** is not related to any Bank or Institution.

Please refer to the website [www.seeclearwealth.com.au](http://www.seeclearwealth.com.au) for details of on the company.

There are two parts to this FSG. Please make sure that you read both parts before making any decision based on our advice. This document is Part one and Part two is the Adviser’s Profile, which includes information about your financial adviser (“adviser”), who is one of our Authorised Representatives. Any reference to an adviser will include the deals of the adviser’s company if they are part of a corporate entity. If the adviser’s profile is not attached please ask the adviser for this profile or contact **Cloudy Holdings Pty Ltd** Head Office whose contact details are in the next section. Your adviser is authorised by us to distribute this FSG.

### WHAT IS A FINANCIAL SERVICES GUIDE (FSG)?

The Financial Services Guide (FSG) is an important document that is designed to help you decide whether to use the financial services offered. The main purpose of the Financial Services Guide (FSG) is to give you an overview of the financial services that are being offered and it provides you with the following information:

- About us;
- What kinds of financial services we are authorised to provide to you;
- The process we follow to provide financial services;
- How we, our Authorised Representatives (and any other relevant persons) are remunerated;
- Are there any of our associations or relationships that might influence the financial services we offer?
- How we collect, use and disclose the information you provide to us
- Our complaints handling procedures and external dispute resolution procedures including how you can access them.

The terms Representative, Authorised Representative, Corporate Authorised Representative, and Advice Provider means that a person, or entity, is authorised to represent a business that holds an Australian Financial Services (AFS) licence. **Cloudy Holdings Pty Ltd** is the holder of an AFS Licence and is therefore responsible for the financial services provided, including the distribution of this Financial Services Guide (FSG).

As there are many different titles in the marketplace describing such authorised representatives and advice providers throughout this document, we are describing them as Adviser(s) or Your Adviser(s).

## WHAT KINDS OF FINANCIAL SERVICES WE ARE AUTHORISED TO PROVIDE TO YOU AND WHAT KINDS OF FINANCIAL PRODUCTS DO THESE SERVICES RELATE TO?

Cloudy Holdings Pty Ltd is authorised to provide product advice on and to deal in the following strategies and classes of products:

### Strategies

Financial planning strategies including:

- Tax planning (in consultation with your tax adviser)
- Estate planning
- Business succession planning including life risk insurance
- Life Insurance and risk management
- Pre and post retirement planning
- Retirement income
- Social security advice
- Investments
- Self-managed superannuation funds (SMSF)
- Wealth accumulation
- Wealth creation
- Gearing
- Standard Margin lending
- Superannuation and rollover advice
- Asset allocation and management advice
- Ongoing advice and review services

### Product Classes

- Deposit and payment products limited to; basic deposit products and deposit products other than basic deposit products.
- Debentures, stocks or bonds issued or proposed to be issued by a government.
- Life Products including: Investment Life Insurance Products, and Life Risk Insurance Products.
- Interests in managed investment schemes including: Investor directed portfolio services.
- Retirement savings accounts ("RSA") products (within the meaning of the Retirement Savings Account Act 1997).
- Securities.
- Standard Margin Lending Facility.
- Superannuation.

**Your Adviser may only be authorised to provide advice in some of the above areas. Please refer to the Adviser Profile (Part 2 of this FSG) which sets out those areas your Adviser is authorised to provide you with advice and recommendations.**

Please note that only products approved by **Cloudy Holdings Pty Ltd** may be recommended by the adviser.

If you hold a specific product which is under a class of product covered by the Cloudy Holdings Pty Ltd licensee, your adviser may review and advise you on this product even though it is not on our APL. However, your Adviser will not be able to deal in, write or arrange further business on this product if it is not on our:

- APL;
- is a product on which they are not authorised to provide personal advice. The Adviser Profile (Part two of this FSG) outlines the classes of financial products on which they can provide advice.

Your adviser may also conduct separate business activities such as accounting, mortgage advice and other services not provided under our licence. We are only responsible for the financial products and services described in this FSG and on our APL. From 1 July 2014, new regulation requires your financial adviser to declare whether they are a registered (tax) adviser and the tax (financial) advice service they are authorised to provide.

### NOT INDEPENDENT

**Cloudy Holdings Pty Ltd** receives commission payment on Life Insurance Products. This allows us to advise and place your insurance without charging you, the client, directly but rather receiving remuneration from product issuers. By doing this we are not allowed to use the words Independent, Impartial or Unbiased when describing our business. For more information on this please ask your adviser.

## THE PROCESS WE FOLLOW TO PROVIDE FINANCIAL SERVICES

Your adviser acts as our Authorised Representative when providing personal advice to you and therefore we are responsible for any advice given. Your adviser is under an obligation to act in your best interests in relation to any personal advice provided to you (known as the 'best interest duty').

Your adviser is authorised by us to give your personal advice, but in order for them to do so, you need to provide them with information about your needs, goals and objectives. If you choose not to provide your adviser with this information, any advice they provide may not be appropriate to your needs.

## PROVIDING YOUR ADVISER WITH INSTRUCTIONS ON HOW TO BUY OR SELL FINANCIAL PRODUCTS.

You may specify how you would like to give your adviser instructions, for example, in writing, by telephone, fax or other means. However, in some instances your adviser will require your instructions to be in writing. For your own protection, you should not:

- sign any blank forms or documents
- appoint any financial adviser to act as your attorney or authorised signatory
- nominate any financial adviser to receive your statements without you also receiving a copy, or
- give your adviser unclear or misleading instructions or false information.

Other documents that you may receive in addition to the FSG and Adviser Profile, your financial adviser may provide you with the following documents:

- A Statement of Advice (SoA) or Record of Advice (RoA).  
Before your adviser provides you with any personal financial product advice (personal advice), they will collect information about you, your objectives, financial situation and needs. The SoA will set out the advice and the basis upon which it is given. You may then decide whether or not to act on it. It will also set out information about our remuneration and your adviser's remuneration and disclose any associations or relationships which might reasonably be expected to influence them when providing the advice. Any subsequent personal advice that is provided to you may, if it is in relation that has already been provided to you, be documented in an ROA, provided there has not been a significant change in your personal circumstances or the basis upon which the initial advice was provided. Copies of all advice documents will be retained on your client file and you may request a copy by contacting your adviser.
- A Product Disclosure Statement (PDS).  
If a particular financial product (other than securities) is recommended by your adviser you must also be provided with a PDS issued by the product issuer. The PDS contains information about the benefits, risks and other features of the product, which will enable you to make an informed decision about whether to purchase the product.

## HOW WE, OUR ADVISERS (AND OTHER RELEVANT PERSONS) ARE REMUNERATED

Both we, and your adviser receive remuneration from:

- service and advice fees paid by you;
- Remuneration and other payments paid by product providers;
- other benefits.

All Fees and Remunerations must be paid to us, the Financial Services Licensee. We will then forward on to your adviser their share of the fee or remuneration.

No Fee or Remuneration is allowed to be paid to your Adviser directly or by way of direct debt to your adviser's account.

### Service and advice fees paid by you

Your adviser will discuss and explain our fee structure with you before we provide you with any financial advisory services. The types of fees you can be charged are listed below. Also, you may be charged a combination, or part of, any of these fees:

- Fee for advice - your adviser may charge fees for the preparation and implementation of the advice. These fees will be based on your individual circumstances, the complexity of your situation and the time it takes to prepare personal financial advice for you.
- Ongoing advice fee - your adviser may charge a fee to provide ongoing portfolio reviews and/or for the provision of ongoing services. This fee will be either a set amount or based on the amount of funds under our advice, and/or the time involved in reviewing your portfolio, e.g. an hourly rate. Your adviser will discuss these fees with you prior to giving you the advice.
- **General Advice / Execution Only instructions**  
Where “General Advice” or an “Execution Only” instruction is provided, you may request particulars of remuneration payable to us and to your adviser, directly from your adviser. Please refer to the Adviser Profile attached for information about any portion of these fees that we may retain and please ask your adviser, or us, if you require further information about any of the fees and charges that you pay.

### **Payment methods**

Our fees are either invoiced to you directly, or deducted from your investments, or a combination of these methods. Where it is debited from your investments, it is normally referred to as the Adviser Service Fee. In most instances, you will be able to select the method of payment that suits you best. Your Adviser will discuss and agree the method of payment with you before providing you with services. The specific fees and services that you will pay for will be set out in your SoA or other advice documents, your annual fee disclosure statement or client service agreement.

Your current options:

- You may choose to be charged a financial planning advice fee that is based on the time spent preparing your SoA (or other advice document) and is dependent on the complexity of the advice; or
- You may enter into a service agreement with your adviser that covers items such as ongoing advice, newsletters, annual reviews and portfolio valuation reports. You and your adviser should discuss the services to be included and the fee that you will pay. Alternatively, it will be set out in the service agreement provided by your adviser either before, or at the time, you are presented with your SoA.

### **Remunerations and other payments paid by product providers**

If you implement a financial product through us, we may receive payments in the form of initial remuneration and/or ongoing remuneration from the financial product providers. These remunerations are included in the fees and premiums you pay for the product. This is not an additional cost to you.

### **Investment products held pre 1 July 2013**

We may receive initial (upfront) remuneration from the product provider for additional amounts invested in products you held prior to 1 July 2013. Generally, the remuneration will be a percentage of the amount you invest (may be up to 5.5 per cent including GST) and may vary from product to product.

We may also receive ongoing (trail) remuneration from the product provider on a periodic basis for the duration of your investment. Details of such remuneration (which may be up to 1.1 per cent including GST) will be set out in your SoA.

### **Referral arrangements**

Your adviser may have referral arrangements or associations with other financial services providers, such as accountants. These are detailed in the Adviser Profile and may be referred to in any advice document provided to you.

## HOW WE COLLECT, USE AND DISCLOSE INFORMATION

Your adviser will retain the following personal information on your client file:

1. A record of what you tell your adviser about your objectives, financial situation and needs to enable your adviser to give your personal advice.
2. A copy of all personal advice provided to you. This includes the Statement of Advice or Record of Advice (SoA or RoA) provided to you when you initially received personal advice, as well as any subsequent advice. and
3. Other records relating to the provision of financial services and advice given to you. Ask your adviser if you would like to examine your client file. You can request a copy of any advice document either by phone or in writing. Please allow at least seven working days to process your request.

If your adviser leaves our licence and starts providing financial services under another licensee, your information may be transferred to the new licensee. You will be advised of any such transfer prior to it taking place and you will be given the opportunity to remain with one of our **Cloudy Holdings Pty Ltd** advisers if you prefer to do so.

### Your privacy

We are committed to maintaining the privacy and security of your personal information. Your personal information will be collected for the primary purpose of providing you with the services described in this FSG. If you do not provide the personal information requested, we may be unable to provide you with the financial services you have requested.

### Anti-Money Laundering and Counter Terrorism

As a financial service provider, we have an obligation under the Anti-Money Laundering and Counter Terrorism Finance Act 2006 (Cth) to verify your identity and the source of any funds. This means that we will ask you to present identification documents to meet the ID requirements which are determined by the relevant regulator AUSTRAC. We will also retain copies of this information. In connection with providing our services to you, we may disclose information about you to your Authorised Representatives and to other professionals, such as insurance providers, superannuation trustees, product issuers, auditors and our service providers.

We are unlikely to disclose your personal information to overseas recipients. However, any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient of your personal information complies with the Australian privacy law. Should your adviser utilise an overseas service provider, these arrangements will be detailed in their Adviser Profile.

### Your Privacy

Your personal information will be handled in accordance with our Privacy Policy which outlines how we collect, use, store and disclose your personal information. For more information, including how to access or correct your personal information, or how to complain about a breach of the Australian Privacy Principles, please read our Privacy Policy which can be accessed on our website ([www.seeclearwealth.com.au](http://www.seeclearwealth.com.au)) or by contacting us on 0412 972 144 & 0430 363 111 or by writing to:

Privacy Officer

**CLOUDY HOLDINGS PTY LTD**

Unit 18, 2 Yallourn Street, Fyshwick ACT 2609

or by asking your adviser for a copy.

## OUR COMPLAINTS HANDLING PROCESS

If you have a complaint about the financial services provided to you, you should take the following action:

1. Speak to your financial adviser about your concerns, or
2. Call the compliance manager on 0412 972 144.

If after speaking to us or your financial adviser, and your complaint is not resolved within five business days, please write to:

Compliance and Professional Standards Manager

**CLOUDY HOLDINGS PTY LTD**

Unit 18, 2 Yallourn Street, Fyshwick ACT 2609

Or Email [sean@seeclearwealth.com.au](mailto:sean@seeclearwealth.com.au)

We will try and resolve your complaint quickly and fairly. If your complaint cannot be resolved by us to your satisfaction or within 30 days, you may refer your complaint, free of charge, to Australian Financial Complaints Authority (AFCA) of Cloudy Holdings Pty Ltd is a member.

AFCA can be contacted on:

1800 931 678 or via mail:

Australian Financial Complaints Authority

PO Box 3 Melbourne Victoria VIC 3001

Website: [www.afca.org.au](http://www.afca.org.au)

Alternatively, other matters can be referred to the industry regulator, the Australian Securities and Investments Commission (ASIC) on 1300 300 630 or via the website [www.asic.gov.au](http://www.asic.gov.au).

### Professional Indemnity (PI) Insurance Cover

Our professional indemnity insurance covers us and our authorised representatives for the services provided under our Australian Financial Service Licence. This includes claims relating to the conduct of staff and representatives who no longer work for us, but did so at the time of relevant conduct. Our policy meets the requirements of the Corporations Act 2001 (Cth).

## PART 2 - ADVISER PROFILE

### INTRODUCTION

This Adviser Profile is Part 2 of our Financial Services Guide (FSG) and provides you with further information about your Authorised Representative of Cloudy Holdings Pty Ltd. The Adviser Profile must be read in conjunction with Part 1 of the FSG and if Part 1 is not attached please ask the adviser for this profile or contact Cloudy Holdings' Head Office on 18/ 2 Yallourn Street, Fyshwick ACT 2609.

### WHO IS MY ADVISER?

Your adviser is Sean Morton (ASIC Authorised Representative No. 1251404 Trading as See Clear Wealth Pty Ltd. Sean is an Authorised Representative of Cloudy Holdings Pty Ltd.

Sean's contact details are:

Office Address:	Unit 18, 2 Yallourn Street, Fyshwick ACT 2609
Postal Address:	Unit 18, 2 Yallourn Street, Fyshwick ACT 2609
Mobile:	0412 972 144
Email:	sean@seeclearwealth.com.au
Company Website:	<a href="http://www.seeclearwealth.com.au">www.seeclearwealth.com.au</a>
Facebook:	<a href="https://www.facebook.com/SeeClearWealth/">https://www.facebook.com/SeeClearWealth/</a>

#### **Experience:**

Sean is one of two Directors in See Clear Wealth Pty Ltd and has had over 11 years' experience in the finance industry as a paraplanner and now business owner.

#### **Qualifications:**

Sean's qualifications include a Bachelor of Business Finance (International Business) and the Diploma of Financial Planning.

#### **Memberships:**

AFA AFCA FBAA

#### **Referral Relationships:**

N/A

### WHAT KINDS OF FINANCIAL SERVICES ARE YOU AUTHORISED TO PROVIDE ME AND WHAT KINDS OF FINANCIAL PRODUCT/S DO THOSE SERVICES RELATE TO?

Sean is authorised by Cloudy Holdings Pty Ltd to provide product advice on and to deal in the following strategies and classes of products:

#### **Strategies**

Financial planning strategies including:

- Tax planning (in consultation with your tax adviser)
- Estate planning
- Business succession planning including life risk insurance
- Life Insurance and risk management
- Pre and post retirement planning
- Retirement income
- Social security advice
- Investments

#### **Product Classes**

- Deposit and payment products limited to; basic deposit products and deposit products other than basic deposit products.
- Debentures, stocks or bonds issued or proposed to be issued by a government.
- Life Products including: Investment Life Insurance Products, and Life Risk Insurance Products.
- Interests in managed investment schemes including: Investor directed portfolio services.



- Self-managed superannuation funds (SMSF)
- Wealth accumulation
- Wealth creation
- Gearing
- Standard Margin lending
- Superannuation and rollover advice
- Asset allocation and management advice
- Ongoing advice and review services
- Retirement savings accounts (“RSA”) products (within the meaning of the Retirement Savings Account Act 1997).
- Securities.
- Standard Margin Lending Facility.
- Superannuation.

Only products approved by Cloudy Holdings Pty Ltd may be recommended by the adviser.

## HOW ARE ANY REMUNERATIONS, FEES OR OTHER BENEFITS CALCULATED FOR PROVIDING THE FINANCIAL SERVICES?

The cost of providing a financial product or service to you will depend on the nature and complexity of the advice, financial product and/or service provided. The payment options for the provision of financial services will be discussed with you by your adviser and are as follows:

- Fee for service
- Implementation fees
- Transaction fees
- Brokerage/Remuneration
- Ongoing service fees
- Or a combination of the above depending on what best suits the client.

Please note that the type of payment option can also depend on the type of product and/or advice implemented, and your adviser will discuss this with you.

The following is the Fee and Brokerage Schedule of Sean:

Initial Consultation	This initial meeting is at no cost to you. Our main aim is to gather information about you and to determine your primary goals and objectives in seeking advice. At the end of this meeting, we will outline the next steps and detail any fees applicable.
Advice preparation Statement of Advice fee Paraplanning fee	The SOA preparation fee will depend on the complexity of your individual circumstances and the type of advice you require. The fee may range from \$0 - \$11,000.
Implementation of Initial Advice Fee (Fee for advice)	This Fee will range from \$0 - \$11,000 depending on the level of complexity of your situation and the advice provided. This fee may be paid by invoice or where authorised by you, deducted from your superannuation or investment account.
Ongoing fee for advice (Retainer) (Fee for advice)	The ongoing advice fee can range from \$0 – \$11,000 per annum. This fee may be paid by invoice or where authorised by you, deducted from your superannuation or investment account.
Ad hoc advice	Where you do not wish to participate in an ongoing advice fee arrangement but require ongoing advice on an ad hoc basis, an hourly fee of between \$0 and \$440 may apply.
Insurance – Initial (Commission on Life Insurance Products)	The relevant insurer will pay initial commission based on a number of factors, including the annual premium, loadings which apply to the premium (such as medical or payment frequency loadings), and any policy or other fees. These factors will vary between insurers. The following ranges will apply (all figures are exclusive of GST and other taxes/statutory charges): If you have a policy that has been in force prior to 1st January 2020 and you have an alteration or increase to that policy, commission of between 0% and 130% may be payable on any increase in premium.

	<p>The maximum commission payable on any policy issued after 1st January 2020 is 60% + GST of the first-year premium. Commission is paid to us by the product provider and is not an additional cost to you.</p>
<p>Insurance – Ongoing (Commission on Life Insurance Products)</p>	<p>Annual commission will be paid when you renew your policy each year. The rate of ongoing commission is between 0% and 33% of the annual policy cost for as long as you hold the product. Commission is paid to us by the product provider and is not an additional cost to you. Commission may also be paid on the basis of increases in sum insured under your policy. This commission will be calculated on the same basis as initial commission (see above) and will vary depending on the insurer.</p>

All fees, remuneration and brokerage payments received for the financial services provided are paid to Cloudy Holdings Pty Ltd retains a percentage of these payments and forwards the balance to Sean Morton.

## ACKNOWLEDGEMENT OF RECEIPT

Signing this page confirms receipt of both Part 1 and Part 2 of the Financial Services Guide issued by Cloudy Holdings Pty Ltd and Sean Morton of See Clear Wealth Pty Ltd.

PLEASE RETAIN BOTH PARTS 1 AND 2 FOR YOUR REFERENCE AND FOR ANY FUTURE DEALINGS



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### Sean Morton

Authorised Representative No. 1251404

ABN: 57 614 676 201

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## VERSION DETAILS

Financial Services Guide:	DEA1.00	14.09.2020
Adviser Profile:	FSG Version 1	10.01.2023

## DECLARATION

I / We acknowledge receipt of both Parts 1 and 2 of this Financial Services Guide

Name:	<input type="text"/>	Name:	<input type="text"/>
Date:	<input type="text"/>	Date:	<input type="text"/>
Signature:	<input type="text"/>	Signature:	<input type="text"/>