



## FINANCIAL SERVICES GUIDE

This Financial Services Guide was prepared and issued with the authority of **Bluewater Financial Advisors**  
Australian Financial Services License No. 411846



Bluewater Financial Advisors Pty Ltd | ABN 99 153 118 533 | AFSL 411846  
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E: info@bluewaterfinancial.com.au

**Authorised Representative: 336988**  
**Version 4 | 01 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'.

Bluewater Financial Advisers (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).

It 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)

The Adviser/s incorporated in this Financial Services Guide are Authorised Representatives of  
Bluewater Financial Advisors Pty Ltd | ABN 99 153 118 533 | AFSL 411846

- 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

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

## **Bluewater Financial Advisors and David Kutcher Financial Planning**

### **About Bluewater:**

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 David Kutcher Financial Planning to provide advice to retail and wholesale clients and is ultimately responsible for the advice provided to you.

David Kutcher Financial Planning Pty Ltd 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.

## **Our obligations to You**

Our initial obligation at the start of the relationship is to fully inform you of your rights, entitlements and detail the services we provide. This FSG is intended to inform you of certain matters relating to your relationship with us prior to you being provided with any Authorised Financial Service. This FSG covers who we are, as Authorised Representatives of Bluewater Financial Advisors Pty Ltd, how we are remunerated and the method by which we engage our professional advice process. It is intended that this document should assist you in determining whether to use any of the services described. It is our duty to provide you with this document at the first available opportunity.

## BUSINESS PROFILE

- David Kutcher Financial Planning Pty Ltd | Corporate Authorised Representative No. 336988
- Michael Berman | Authorised Representative No. 346055
- PO Box 145, Penshurst NSW 2222
- www.dkfp.com.au

📞 02 9570 4400

✉ enquiries@dkfp.com.au

## GETTING STARTED

### SERVICES, WHAT SERVICES DO WE PROVIDE?

As an Authorised Representative of Bluewater Financial Advisors, Michael Berman is licensed to provide a comprehensive range of services which include:

- Financial and Lifestyle Planning
- Financial Coaching
- Cash Management Trusts
- Cash Flow Management
- Wealth Accumulation and Investing
- Managed Investment Advice
- Annual Plan and Portfolio Reviews
- Superannuation & SMSF
- Personal Insurance Advice
- Group Insurance
- Direct Equity Advice
- Retirement Planning Advice

### WHO IS YOUR FINANCIAL COACH?

Michael Berman will provide these services to you (Authorised Representative: 346055).

#### Michael Berman's qualifications are as follows:

- Advanced Diploma in Financial Services (Financial Planning)
- Certificate IV in Mortgage Broking
- B Comm
- B Acc
- CPA (Financial Planning Specialist)
- Registered Tax Agent (No. 78882002)
- Specialist knowledge in Self-Managed Superannuation Funds

*Further details about Michael Berman'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.

## BEFORE RECEIVING ADVICE

### **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. 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.

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

Michael Berman 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: [enquiries@dkfp.com.au](mailto:enquiries@dkfp.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. 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.

## PROVISION OF ADVICE

### **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.

### **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 Information Questionnaire by your Adviser and you will be asked to sign that document, 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.

## **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 Michael Berman Get Paid:**

Michael Berman 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 Michael Berman. 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 \$1,100 while the maximum fee is \$11,000.

## **Ongoing fee for advice:**

If you elect to pay a fee for the ongoing review of your financial planning strategy, the fee is based upon which package you are recommended, and the complexity of ongoing advice and the services provided. The minimum ongoing fee is a minimum of \$550p.a. Maximum fee may be up to 1.1% of your assets capped at

\$11,000.00

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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 60 days of receiving the FDS if you want to continue that arrangement. If you elect to end the arrangement, we have an obligation to stop all ongoing fees and commission.

#### **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 \$440 may apply.

#### **Insurance products:**

- 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.

#### **Referral Fees and Commissions**

We do not accept referral fees or commissions from external parties. We disclose the referral arrangements to you whenever we refer you to an external party.

## **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**

Michael does not accept nor receive any additional benefits from product providers.

## **STATEMENT OF DAVID KUTCHER FINANCIAL PLANNING PRIVACY POLICY**

Bluewater or David Kutcher Financial Planning 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 it 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 David Kutcher Financial Planning by phone on 02 9570 4400 or email [enquiries@dkfp.com.au](mailto:enquiries@dkfp.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.dkfp.com.au](http://www.dkfp.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 is [www.privacy.gov.au](http://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 [info@bluewaterfinancial.com.au](mailto:info@bluewaterfinancial.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](mailto:info@bluewaterfinancial.com.au)

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](mailto:info@afca.org.au)

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

**Complying Compensation Arrangements**

- 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.