
PRIVACY POLICY

INTRODUCTION

ProAdvice is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (*Privacy Act*). This Privacy Policy sets out how ProAdvice handles personal information. This Privacy Policy does not apply to personal information collected by ProAdvice that is exempted under the Privacy Act, for example employee records.

This Privacy Policy applies to ProAdvice Pty Ltd and any of its related entities (referred to as 'ProAdvice', 'we', 'our', 'us') and covers all operations and functions.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by ProAdvice must comply with this Privacy Policy. ProAdvice makes this Policy available free of charge and can be downloaded from www.proadvice.com.au.

ProAdvice may modify this Privacy Policy from time to time to reflect new laws and technology, and changes to our operations and the business environment.

PURPOSE FOR COLLECTION, HOLDING, USING AND DISCLOSING PERSONAL INFORMATION

ProAdvice collects, holds and uses personal information for a number of purposes including:

- To provide professional services
- To respond to requests or queries
- To maintain contact with our clients and other contacts
- To keep our clients and other contacts informed of our services and industry developments
- To notify of seminars and other events
- For administrative purposes
- For recruitment purposes
- For purposes relating to the employment of our personnel, providing internal services or benefits to our partners and staff and for matters relating to partnerships
- To manage any conflict of interest or independence (including auditor independence) obligations or situations
- To conduct surveys or for seeking your feedback
- To meet any regulatory obligations
- As part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business or entering into an alliance, joint venture or referral arrangement
- For any other business related purposes.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

The types of third parties to whom we may disclose your personal information include:

- Expert or other third parties contracted as part of an engagement;
- Our service providers;
- Our professional advisers;
- Cloud service providers including, but not limited to Xero, MYOB, BGL, SuiteFiles and Microsoft;
- As part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client;

- As part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business or to enter into an alliance, joint venture or referral arrangement; or
- Government or regulatory bodies or agencies, as part of an engagement or otherwise, (for example, the Australian Taxation Office).

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you. However, we may share non personal, de-identified or aggregated information to them for research or promotional purposes.

PERSONAL INFORMATION WE MAY SEEK TO COLLECT

The types of personal information we may collect include:

- Names, job titles, contact and address details;
- Information in identification documents (for example, passport, driver's licence);
- Tax file numbers and other government issued identification numbers;
- Date of birth and gender;
- Bank account details, shareholdings and details of investments;
- Details of superannuation and insurance arrangements;
- Estate planning details;
- Financial information (assets, liabilities, income and expenses);
- Educational qualifications, employment history and salary;
- Visa or work permit status;
- Personal information about your spouse and dependants; and
- Any other information that is relevant to the services that we provide.

It may be necessary in some circumstances for ProAdvice to collect sensitive information about you in order to provide specific services or for recruiting purposes. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal record and health information.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with ProAdvice as usually we need to use your personal information to provide specific services to you or which relation to or involve you.

HOW WE COLLECT & MANAGE PERSONAL INFORMATION

How we collect personal information

Generally we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, or when you subscribe to our publications or events). Sometimes it may be necessary for us to collect your personal information from a third party. For example, we may collect your personal information from your employer where they are our client, from your personal representative, or a publicly available record.

We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process on our websites.

Where you provide us with personal information about someone else

If you provide us with someone else's personal information, you should only do so if you have their authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

Holding personal information

ProAdvice holds personal information in hard copy and electronic formats, both in house and with cloud based service providers. We take security measures to protect the personal information we hold including physical (for example, lockable cabinets) and technology (for example, restriction of access, firewalls, the use of encryptions, passwords and digital certificates) security measures. We also have document retention policies and processes.

Disclosure of personal information overseas

ProAdvice may from time to time use cloud storage and back-up services, through third party service providers, which involves the storage of your data on servers in other Australian locations.

We will not send personal information to these types of service providers unless:

- We have taken reasonable steps to ensure that the recipient does not breach the Privacy Act or the Australian Privacy Principles;
- The recipient is subject to an information privacy scheme similar to the Privacy Act; or
- The individual has consented to the disclosure.

DIRECT MARKETING

ProAdvice may also use your personal information for the purpose of marketing its services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- For electronic communications, you can click on the unsubscribe function in the communication; or
- For hard copy communications, you can email info@proadvice.com.au with the subject 'unsubscribe'; or
- Through our contact details below.

PRIVACY ON OUR WEBSITE

We collect personal information from our website (www.proadvice.com.au) when we receive emails and online forms. We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Cookies allow us to track usage patterns so that we can measure the level of interest in various areas of our site. Information collected through such analysis is anonymous.

LINKS TO THIRD PARTY WEBSITES

ProAdvice's website may contain links to third parties' websites. Those other websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of their privacy policy. ProAdvice does not endorse, approve or recommend the services or products provided on third party websites.

GAINING ACCESS TO PERSONAL INFORMATION WE HOLD

You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing to the Practice Manager. Please see the 'How to contact us' section for details. ProAdvice may charge reasonable costs for providing you access to your personal information.

KEEPING PERSONAL INFORMATION CURRENT

If you believe that any personal information ProAdvice has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact your local ProAdvice office and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act.

COMPLAINTS

If you wish to make a complaint to ProAdvice about our handling of your personal information, firstly, please contact your adviser to discuss your complaint. We strive to improve the services we offer and rely on feedback from you to help us in this regard.

Secondly, if you are not satisfied with the response you receive you can contact the Privacy Officer as set out in the 'How to contact us' section. You will be asked to set out the details of your complaint in writing. ProAdvice will endeavour to reply to you within 30 days of receipt of the written complaint.

Thirdly, if the complaint cannot be resolved to your satisfaction you can refer your complaint to the Office of the Australian Information Commissioner:

- By telephoning – 1300 363 992
- By writing to – Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- By email – enquiries@oaic.gov.au

HOW TO CONTACT US

If you have a query in relation to the Privacy Policy or you would like to notify ProAdvice that you no longer wish to receive marketing material from us, access or correct your personal information or to make a complain about ProAdvice's handling of your personal information, please contact ProAdvice as follows:

- By telephoning – 03 5244 8888
- By writing to – **Practice Manager**, ProAdvice, PO Box 770, GEELONG VIC 3220
- By email - info@proadvice.com.au

REVIEW

ProAdvice may amend and vary this policy from time to time.

This policy is to be reviewed every three years.

Next review date - December 2021

Date Ratified - 06/05/2019

RESPONSIBILITY

Practice Manager

If there is anything inconsistent with legislation, then legislation takes precedent.