

BALANCE TAX ACCOUNTANTS

PRIVACY POLICY

(released 21 DEC 2017)

We are bound by the Australian Privacy Principles of the *Privacy Act 1988 (Cth)*.

We are committed to protecting your personal information in accordance with these Privacy Principles and will only use or disclose personal information and any business related information we hold about you in accordance with this Privacy Policy or as otherwise notified to you. Balance Tax Accountants believes that respect for your privacy forms part of the ongoing trust Balance Tax Accountants wishes to develop with you.

“Personal information” is information about an individual who is either identified in the information or whose identity can be ascertained from the information.

This Privacy Policy applies to personal information and any business-related information that we collect from you. It also applies to personal information and business related information that we collect about you from third parties, including information from the Australian Tax Office and ASIC.

We can provide you with this Privacy Policy in an alternative form if you wish – such as a printed version.

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Who does this Privacy Policy apply to?

This Privacy Policy applies to Balance Tax Accountants (ABN 47 109 474 754).

It applies to all of our business operations and the products and services we provide, and to the recruitment and engagement of our officers, employees, contractors and sub-contractors.

By providing us with personal information and business related information, you consent to it being used by us (being any and all of Balance Tax Accountants) for the purposes set out or permitted in this Policy or as otherwise authorised.

What information do we collect and from where?

We collect your information so that we can perform various functions and activities – especially the provision of the products and services that you request from us.

We also collect your information where the law requires us to do so.

If you do not provide us with the information we request, we may not be able to:

- Provide you with the products and services that you request from us or that may be available to you as a customer;
- Manage and administer our relationship with you;
- Let you know about other products or services or benefits associated with being one of our customers that may be of interest to you; and
- Verify your identity and protect against fraud.

Collecting information from you

We collect most information directly from you when you apply for one or more of our products and services or use those products and services. We may collect and hold information from you such as your:

- Name, personal and business contact details including addresses, phone numbers, and email addresses and gender;
- Tax file number (in Australia) and GST number;
- Date of birth;
- Financial details relating to you personally and any business you own or are involved in;
- Transaction and correspondence history with us;
- Bank account and credit card details; and
- Details required by third parties if you have engaged us to arrange a product on your behalf (for example, a company registration arranged by us) including name, address, date of birth, gender, marital status, occupation, account details, contact details and financial information.

Collecting publicly available information

We may also collect information about you that is publicly available, including information from:

- Phone directories and trade directories;
- Websites; and

- Public registers such the company register, business names register and the personal property securities register in Australia.

Collecting information from third parties

We may also collect information about you from third parties. For example, we may collect information from:

- The ATO;
- The Australian Business Register;
- ASIC; and
- Marketing companies, event organisers, mail houses and other services providers if we use them to assist us in providing our products and services.

Collecting sensitive information

Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

We will not collect, use or disclosure sensitive information about you unless we are legally required to do so.

Unsolicited Information

Sometimes we may receive unsolicited information about you. If so, we will check whether or not that the information is reasonably necessary for our functions or activities and we could have collected it from you if we had solicited the information. If it is, we'll handle this information the same way we do with other information we seek from you. If not, and it is lawful and reasonable to do so, we'll ensure we do the right thing and destroy or de-identify it.

Collecting Information Prospectively

We may also collect information from you or from third parties prospectively, having identified you as a person that may wish to use our products or services in the future.

Collecting information from Prospective Employees

When you are dealing with us as a prospective employee, Balance Tax Accountants generally collects and uses information about you in order to process and evaluate your application for employment, including identification information and your employment history.

Unsuccessful application forms may be kept on file up to six months to allow those candidates future opportunities.

Consents and notifications

Your consent is important

We may need your consent to use or disclose your information in certain circumstances including where we want to use your information for a purpose that is not related to the purpose for which we collected it in the first place.

Notifying you of information received

When we receive information from you directly, we'll take reasonable steps to notify you of:

- Why we collected your information including providing you with our contact details,
- How we collected your information (if not from you);
- Who we may disclose it to;
- How we may use it;
- Whether the collection is required or authorised by law such as our obligation to verify your identity as part of anti-money laundering obligations;
- How you can access it, seek correction of it or make a complaint and how we will deal any complaint; and
- The main consequences if your information is not collected.

Sometimes we collect your information from third parties and you may not be aware that we have done so. If we collect information that can be used to identify you, we will take reasonable steps to notify you of that collection.

Using your information

How will we use your information?

We may collect, use and disclose information we collect about you for a number of purposes, including:

- To allow us to provide you with our products and services;
- To allow us to manage our relationship with you, including communicating with you about benefits, events or products and services that you may be receiving or may be entitled to receive;
- To allow us to manage our arrangements with third parties that may be involved in the provision of products or services to you and also to allow these same third parties to manage their arrangements with you;
- To allow us to help a third party provide to you or manage a product or service when we are involved in facilitating the provision of that product or service (for example, a company registration facilitated by Balance Tax Accountants);
- To assist in the management of arrangements with third parties where we have outsourced functions to them that are relevant to the provision of our products or services to you;
- To assist in our general management and administration including for example; rendering of accounts, risk management, strategic development, systems development, credit management, debt collection, staff training and research;
- To deal with any enquiries, complaints or concerns that you may raise with or against us and to manage any legal action that may arise between you and us;
- To prevent or investigate any actual or suspected fraud, illegal act or misconduct;
- To comply with any relevant laws, regulations, codes of practice or payment system requirements; and
- Any other purpose that permitted by law or that you consent to.

You also permit Balance Tax Accountants to disclose your information if by your disclosure (including by your agent, servant or delegate) to a mass media organisation or other

person, your information has ceased to be confidential.

What do we do with government-related identifiers?

In certain circumstances we may be required to collect government-related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law. For example, we collect Tax File Numbers to complete Australian Tax Returns.

Disclosing your information

Consistent with the uses of your information described above, we may disclose information about you to:

- Our related companies, and our employees, officers, assignees, contractors, service providers, mail-houses and external advisers;
- Your agents, advisers, referees, executor, administrator, trustee, the beneficiary of any trust of which you are a trustee, your guardian or attorney;
- Your current and prospective co-borrowers, guarantors, co-guarantors, covenantors and co-covenantors;
- Law enforcement bodies, regulatory bodies and government bodies;
- Payment system operators;
- Any other party that you consent to.

Marketing and your privacy

As part of our services to you, Balance Tax Accountants may use or share your information so that products, services or benefits that we think you may be interested in learning about can be identified and direct marketed to you.

We, or other third parties that we have a relationship with, may contact you from time-to-time about new or existing products or services that we or they offer.

We consider that direct marketing to you by us and other third parties with which we have a relationship forms an integral part of delivering services to you and is directly related to the primary purpose for which we originally collected your information. Without such a service, the communication between you, us and other third parties which we have a relationship with would be substantially reduced and you would be unlikely to receive the benefits and returns you expect from being one of our customers.

You can let us know at any time if you no longer wish to receive marketing materials from us (see "Contact Us"). Also you can let any third party know at any time if you no longer want to receive marketing materials from them.

Our direct marketing publications all include details on how you can opt-out of receiving such communication in the future.

Taking care of your information

How do we take care of your information?

We store information in different ways, including in paper and electronic form. The security

of your information is important to us and we take reasonable steps to protect it from misuse, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- Physical security of business premises;
- Confidentiality requirements of our employees;
- Security measures for access to our systems;
- Only giving access to information to a person who reasonably requires access to it in order to perform their duties;
- Control of access to our buildings; and
- Electronic security systems, such as firewalls and data encryption on our websites.

We may store information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses of it.

What happens when we no longer need your information?

We'll only keep your information for as long as we require it for the purposes that it was collected for. We're also required to keep some of your information for certain periods of time under law. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

We will retain information and use it to ensure that we identify persons who have, in the past, failed to meet their repayment obligations to Balance Tax Accountants, either directly or through their association with a business.

Accessing your information

How do you access your information?

Upon request we will give you access to your information in a reasonable period of time unless there are certain legal reasons for why we can't.

We will give you access to your information in the form you want it where it's reasonable and practical to do so. We may charge you for our reasonable expenses relating to giving you access, but we'll always notify you of any expenses prior to complying with your request for access.

In certain circumstances we are not able to give you access to your information. For example this may include when:

- We reasonably believe that giving access would pose a serious threat to the life, health or safety of any individual, or to public health or public safety; or
- The access would have an unreasonable impact upon the privacy of other individuals; or
- The request for access is frivolous or vexatious; or
- The access would be unlawful or would prejudice any legal investigations.

If we can't provide your information in the way you've requested, we will tell you why in writing and attempt to find an alternative way in which to satisfy your request. If you are not happy with the way we have dealt with your request you can complain. See "Resolving Your Privacy Issues".

Correcting your information

How do you correct your information?

We take reasonable steps to make sure that the information we collect, use or disclose is accurate, complete and up-to-date. We also take reasonable steps to ensure that information we holds is relevant having regard to the purpose for which it was collected.

Contact us if you think there is something wrong with the information we hold about you and we'll try to correct it if it's inaccurate, out of date, incomplete, irrelevant or misleading.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

If you have concerns about the way we have handled a request to correct information you can complain. See "Resolving your Privacy Issues" for more information.

Time frame for correcting information

If we agree to correct your information, we'll do so within 30 days from when you asked us, or a longer period that has been agreed by you.

If we can't make corrections within a 30 day time frame or the agreed time frame, we will:

- Let you know about the delay, the reasons for it and when we expect to resolve the matter;
- Ask you to agree in writing to give us more time; and
- Let you know you can complain to the Office of the Australian Information Commissioner.

Resolving your privacy issues

How do you make a complaint?

If you believe that there has been a breach of privacy or you do not agree with a decision we have made about your access to or correction of personal information, you can make a complaint to us through our Privacy Officer on the details below under the heading "Contact Us" and we will endeavour to resolve it by following our internal complaint resolution process.

If your complaint relates to how we handled an access or correction request then you may take your complaint directly to the Office of the Australian Information Commissioner. You are not required to let us try to fix it first, although we would welcome you giving us the opportunity to try and do so.

If your complaint is about other things in relation to your personal information, we will let you know how we will deal with it within 7 days.

If we can't fix things within 30 days or any longer agreed timeframe, we'll let you know why and how long we think it will take. We will also ask you for an extension of time to fix the matter.

If you have any concerns, you may complain to the Office of the Australian Information

Commissioner.

Need more help?

For further information about privacy issues in Australia and protecting your privacy, you may visit the Office of the Australian Information Commissioner website at <http://www.oaic.gov.au/privacy>.

If you still feel your privacy issue hasn't been resolved to your satisfaction, then you can raise your concern with the Office of the Australian Information Commissioner.

The Office of the Australian Information Commissioner

Phone: 1300 363 992
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au
Mail: GPO Box 5218
Sydney NSW 2001

Contact us

We care about your privacy and we always welcome your feedback. Please contact us if you have any questions or comments about the way we handle your information.

Phone: 0430 446 507
Email: hello@balancetax.com.au
Mail: The Privacy Officer
Balance Tax Accountants
PO Box 576
Balcatta WA 6021
Australia

Dealing with us anonymously

If you have general enquiry type questions, you can choose to do this anonymously or by using a pseudonym. We may also offer anonymity in respect of surveys and questionnaires. However generally, we won't be able to deal with you anonymously or where you are using a pseudonym if:

- it is impracticable for us to do so; or
- we are required or authorised by law or a court/tribunal order to deal with you personally.

It is impractical for us to offer anonymity or pseudonymity to individuals in relation to our main business activities.

Changes to this Privacy Policy

This Privacy Policy may change at any time. We will let you know of any changes to this Privacy Policy by posting a notification on our website. We encourage you to review our Privacy Policy on our website from time-to-time for any changes. Any changes to our Privacy Policy will be effective on the date they are published on our website.