

PRIVACY POLICY

YOUR RIGHTS IN RELATION TO PRIVACY

Enrich Accountants and Advisers respects your privacy and is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act) and the subsequent 2012 and 2016 amendments (Mandatory Data Breach Notification), The General Data Protection Regulation (GDPR) and the APES 110 Code of Ethics for Professional Accountants.

This policy outlines the obligations Enrich Accountants and Advisers has in managing the personal information we hold about our clients, potential clients, contractors, and others. This includes information such as your name, email address, identification number, or any other type of information that can reasonably identify an individual, either directly or indirectly. This policy is not intended to, nor can it, replace the provisions Acts themselves.

The Privacy Policy does not apply to acts or practices that are directly related to employee records of current or former employees.

If you would like further information on this privacy policy, you may contact us via the contact details set below

KINDS OF PERSONAL INFORMATION WE COLLECT

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, Enrich Accountants and Advisers may collect your personal information.

Generally, the kinds of personal information Enrich Accountants and Advisers are:

- contact and identification information such as your name, address, telephone number, email address and date of birth
- financial information about your assets, occupation and income, investments, account balances, account activities, and payment history
- details of superannuation and insurance arrangements
- educational qualifications, employment history and salary
- information contained in CVs or employment applications in relation to potential roles with Enrich Accountants and Advisers
- sensitive information (e.g. information about your health, medical history or specific condition, criminal record, professional memberships etc), which will only be collected with your consent, and if the information is reasonably necessary for Enrich Accountants and Advisers to provide its services to you; and
- other information relevant in the circumstances.

Under the following law, we are required or authorised to collect personal information:

- certain identification information about an individual by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)
- an individual's Tax File Number, if they choose to provide it, by the Income Tax Assessment Act 1936 (Cth) and
- certain information in relation to the individual's application if they have applied for an insurance as required by the Insurance Contracts Act 1984 (Cth).

HOW WE COLLECT YOUR PERSONAL INFORMATION

Enrich Accountants and Advisers collects most of the personal information directly from the individual. This can be done electronically.

Enrich Accountants and Advisers also collects personal information about an individual from other areas of its business including sharing information amongst its subsidiaries and related parties or from third party organisations. This may happen without the individual's direct involvement. For instance, we will collect personal information about an individual from:

- publicly available sources of information
- the individual's external representatives (including legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney)
- the individual's employer
- commercial information service providers, such as companies that provide fraud prevention reports and
- insurers, re-insurers and health care providers.

USE AND DISCLOSURE

Enrich Accountants and Advisers generally uses personal and sensitive information to provide specified professional services, and to raise awareness about recent business-related developments that may be of relevance or interest. We may also share personal information to our external service providers, to communicate information about our wide range of business services or latest business solutions.

Generally, Enrich Accountants and Advisers obtains your consent in writing or implied, prior to disclosing your personal information to a third party. However, in some circumstances we may use and disclose your personal and sensitive information where it is required or permitted by Law or in emergency situations.

Enrich Accountants and Advisers may be required to provide your personal and sensitive information to:

- Australian Taxation Office
- Australian Securities and Investments Commission
- Financial planning institutions; and
- Overseas recipients

Enrich Accountants and Advisers are likely to disclose information to entities located outside Australia in particular, USA, India and Philippines, in the provision of our services, including receipt of bank statements. We endeavour to ensure that such third parties comply with the APP's, our privacy policy and confidentiality obligations under Australian jurisdiction. You accept that the privacy laws of off-shore entities may differ from and be less stringent than the requirements of the privacy laws of the jurisdiction of Australia. In those cases, we are not responsible for imposing the laws of the overseas jurisdiction, and you may not be able to seek redress under those laws.

By giving Enrich Accountants and Advisers your personal information, you consent to such transfer and disclosure. In addition, we believe that the recipients of such information are subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are identical or substantially similar to the applicable Australian privacy laws.

Enrich Accountants and Advisers will take all reasonable steps to notify you of the information collected, used and disclosed at all times.

DATA QUALITY AND SECURITY

To the extent required by the Privacy Act, Enrich Accountants and Advisers will take reasonable steps to:

- Make sure that the personal information that we collect, use and disclose is accurate, complete and up-to-date
- Protect the personal information that we hold from misuse and loss and from unauthorised access, modification or disclosure and
- Destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Privacy Act.

Some of the security measures we have in place are:

- Restricted access to our premises and physical records
- Password protection and firewalls to protect electronic information
- Clause's in employee agreements requiring confidentiality.

PRIVACY ON OUR WEBSITES

Enrich Accountants and Advisers' website uses Google Analytics or other third-party software to analyse aggregate user behaviour. Google Analytics and such other software uses first party cookies, which are text files placed on your computer for the purpose of anonymously identifying your session. These cookies are not used to grant Enrich Accountants and Advisers access to your personally identifiable information. Non-identifiable information (such as the pages you visit) may be tracked. By directing your browser to delete your cookies, this data will be erased. For more information about Google Analytics, please follow the links provided on our website.

The information is collected using first party cookies, meaning that only Enrich Accountants and Advisers is able to access your information. Your information may be aggregated with information from other users for the purpose of improving our website and offerings. We will not associate any data gathered from our website with any personally identifiable information, unless you explicitly submit that information (e.g. your email address) via our online information form.

Any links to third party websites on Enrich Accountants and Advisers' website are not covered by our privacy policy.

SOCIAL MEDIA PLATFORMS

You may wish to participate in the various social media platforms hosted by us and which we make available to you. These platforms are designed to facilitate and share content. We cannot be held responsible if you publicly share personal information on these sites that is subsequently used, misused or otherwise appropriated by another party/entity.

DIRECT MARKETING

Enrich Accountants and Advisers may use and disclose your personal information to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting Enrich Accountants and via the contact details set below or through any opt-out mechanism contained in a marketing communication to you.

ACCESS AND CORRECTION

You may request access to the personal and sensitive information we retain about you and request corrections or deletions at any time. However, this right of access is subject to some exceptions permitted by law.

To make a request, please put your request in writing or call our privacy officer using the contact details below.

Enrich Accountants and Advisers reserves the right to charge a fee for searching for and providing access to your personal information. In the event we refuse you access to your personal information; we will provide you with an explanation for that refusal.

We will always endeavour to ensure that the personal information that we hold about you is up to date and accurate. The accuracy of the personal information is dependent to a large degree on the information you provide, and you should advise us if there are any errors or changes to your personal information.

CHANGES TO THIS PRIVACY POLICY

This Privacy Policy is not a static document. We may make changes to this Privacy Policy from time to time for any reason. We will publish any updated Privacy Policy on our website.

PRIVACY COMPLAINTS

If you wish to complain about an interference with your privacy, then you must follow the following process:

- The complaint must be firstly made to us in writing, using the contact details set below. We will have a reasonable time to respond to the complaint.
- In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

HOW TO CONTACT US

For further information or enquiries regarding your personal information, or if you would like to opt-out of receiving any promotional or marketing communications, please contact:

Enrich Accountants and Advisers
Waterman Business Centre
Suite 108, Level 2, 66 Victor Crescent
Narre Warren VIC 3805
Tel: 1300 752 148
E-Mail: hello@enrichaccountants.com.au