

# Accru Privacy Policy

## Introduction

This policy (**Privacy Policy**) sets out how Accru Hobart Pty Ltd, Accru Hobart Wealth Advisers Pty Ltd and their subsidiaries and related entities (referred to collectively as **Accru, we, our, us**) collect, use, disclose and manage your personal information.

This Privacy Policy contains information about how:

- you may access the personal information we hold about you;
- you may seek the correction of your personal information;
- you may ask us to provide an alternative means of identity verification for the purposes of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth);
- you may complain about a breach of the Privacy Act, including the APPs; and
- we will deal with a privacy complaint.

Accru is bound by the *Privacy Act 1988* (**Privacy Act**), including the Australian Privacy Principles (**APPs**), and recognises the importance of ensuring the confidentiality and security of your personal information.

All third parties (including clients, suppliers, sub-contractors, or agents) that have access to or use personal information collected and held by Accru are also required to abide by this Privacy Policy. Accru makes this Privacy Policy available free of charge and can be downloaded from its website:

<https://accruhobart.com.au/privacy-policy/>

Accru may modify this Privacy Policy from time to time, to reflect new laws, technology and/or updates to Accru's privacy practices and operations.

In this Privacy Policy:

- **Disclosure** of information means providing information to persons outside of Accru;
- **Personal information** means information or an opinion relating to an individual, which can be used to identify that individual;
- **Privacy Officer** means the contact person within Accru for questions or complaints regarding Accru's handling of personal information;
- **Sensitive information** is personal information that includes information relating to a person's racial or ethnic origin, political opinions, religion, trade union or other professional or trade association membership, sexual preferences and criminal record, and also includes health information; and
- **Use** of information means use of information within Accru.

## **Personal information we collect and hold**

Accru collects personal information about our clients, individuals associated with our clients and our business contacts, primarily to provide professional services and to effectively manage our business relationships. The types of personal information we collect depends on the service we have been asked to provide and include:

- names, job titles, contact and address details;
- information in identification documents (for example, passport details and driver's licence);
- tax file numbers and other government-issued identification numbers;
- date of birth and gender;
- bank account details, credit account details, shareholdings and details of investments;
- details of superannuation and insurance arrangements;
- educational qualifications, employment history and salary;
- business information, such as ABN and trading name;
- your IP address, information about the devices on which you visit the Accru website, and your activities on the website (for example, browsing data and site interactions);
- if you apply to work with Accru, personal information that may be relevant to your application, including for example employment history and academic records;
- nationality, Visa or work permit status; and
- personal information about your spouse and dependants.

Accru does not adopt identifiers assigned by the Government (such as drivers' licence numbers) for our own file recording purposes, unless one of the exemptions in the Privacy Act applies.

### **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. Other ways that we may collect information from you include through your access and use of our website, emails, online portals and social media sites by use of Google Analytics and Meta Pixel tools.

We may also collect personal information about you from a third party, such as electronic verification service providers, referrers and marketing agencies. We may also collect your personal information from your employer where they are our client, from your personal representative or from a publicly available record. If so, we will take reasonable steps to ensure that you are made aware of this Privacy Policy.

We will not collect sensitive information about you without your consent, unless an exemption in the APPs applies. These exceptions include if the collection is required

or authorised by law, or necessary to take appropriate action in relation to suspected unlawful activity or serious misconduct.

If you do not provide us with the personal information that we request from you, we may not be able to provide you with the benefit of our services, or meet your needs appropriately.

### **Website collection**

We may also collect personal information about you when we receive completed contact or registration forms submitted through our website:

<https://www.accru.com/>.

We may also use third parties to analyse traffic at that website, which may involve the use of cookies. Information collected through such analysis is anonymous. To use our website, you must consent to our use of cookies. You can withdraw or modify your consent to our use of cookies at any time. If you no longer wish to receive cookies, you can use your web browser settings to accept, refuse and delete cookies. To do this, follow the instructions provided by your browser. Please note that if you set your browser to refuse cookies, you may not be able to use all of the features of our website.

Cookies do not contain personal information in themselves, but can be used to identify a person when combined with other information. Cookies are small text files which are transferred to your computer's hard drive through your web browser that enables our website to recognise your browser and capture and remember certain information. This includes facilitating your use of previously viewed pages on our website. We also use cookies to understand how users interact with our website, to compile aggregate data about our website traffic, including where our website visitors are located, and interaction so that we can offer better user experiences.

We will delete all data obtained through cookies on a regular basis, typically within a 30 – 60 day period.

We also use analytics on the site. We do not pass any personally identifiable information through this function, however, the data we collect may be combined with other information which may be identifiable to you.

### **Unsolicited personal information**

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or

entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

### **Personal information about third parties**

You should only provide us with someone else's personal information, if you have that person's authority or consent to provide us with their personal information. In providing us with someone else's personal information, you warrant to us that you have authority and their consent to do so and that they have granted us permission to collect, store and use their personal information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy or any Privacy Collection Statement we give you.

### **Security of personal information**

Accru holds personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold from misuse, interference or loss, and unauthorised access, modification or disclosure.

Any paper files are stored securely at our offices with limited access to authorised employees. In relation to information that is held on our computer database, we apply the following guidelines:

- passwords are required to access the system, and passwords are routinely checked;
- data ownership is clearly defined;
- we change employees' access capabilities when they are assigned to a new position;
- employees have restricted access to certain sections of the system;
- the system automatically logs and reviews all unauthorised access attempts;
- unauthorised employees are barred from updating and editing personal information;
- all computers which contain personal information are secured both physically and electronically using digital certificates;
- data is encrypted during transmission over the network and protected by firewalls; and
- print reporting of data containing personal information is limited.

### **Who do we collect personal information about?**

The personal information Accru may collect and hold includes (but is not limited to) personal information about:

- clients;
- potential clients;
- family members or associates of clients or potential clients;
- service providers or suppliers;
- prospective employees, employees and contractors; and

- other third parties with whom we come into contact.

## **Why we collect personal information**

Accru 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, or keep them informed of our services and industry developments;
- to notify our clients of seminars and other events;
- to promote and market other services we offer that may be of interest to you, including on social media platforms;
- for administrative or recruitment purposes;
- when engaging service providers, other Accru member firms, contractors or suppliers relating to the operation of our business;
- to manage any conflict of interest or independence (including auditor independence) obligations or situations;
- to conduct surveys for seeking your feedback;
- to maintain business records and meet any regulatory obligations;
- to improve the services that we provide to you and enhance user experience of our website;
- for staff training and quality audits;
- as part of an acquisition, disposition, merger or de-merger of a business or entering into an alliance, joint venture or referral arrangement; and
- for any other business-related purposes.

We may use and disclose your personal information for any of these purposes. We may also use and disclose your personal information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

## **Disclosure of personal information**

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

- an agent, contractor or service provider we engage to carry out our functions and activities, such as our financial advisers, electronic verification providers, information technology providers, insurance providers, platform providers and debt collectors ;
- our professional advisers, including for example accountants and lawyers;
- other Accru firms, related Accru entities, or MGI Worldwide member firms;
- a customer, agent, contractor or service provider of one of our clients;

- as part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients;
- organisations involved in a transfer or sale of all or part of our assets or business;
- organisations involved in managing payments, including payment merchants and other financial institutions, such as banks;
- regulatory bodies, government agencies, law enforcement bodies (such as the ATO) and courts;
- financial product issuers; and
- anyone else to whom you authorise us to disclose it or is required by law.

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you, unless it is with your express and fully informed consent. However, we may share non personal, de-identified or aggregated information to them for market research or promotional purposes.

We may on occasion disclose information about you to entities that are not part of Accru for market research purposes only. We will require these entities to agree to strict conditions governing how this information will be used. The information collected will be used solely for research purposes to investigate the needs and opinions of individuals or companies in relation to accounting services.

If we disclose your personal information to service providers that perform business activities for us, they may only use your personal information for the specific purpose for which we supply it. We will ensure that all contractual arrangements with third parties adequately address privacy issues, and we will make third parties aware of this Privacy Policy.

### **Use of personal information overseas**

Accru is a member firm of MGI Worldwide, which is an international network of over 150 independent audit, tax and accounting firms. Depending on the nature of the engagement or purpose of collection, we may disclose your personal information to other MGI member firms or related entities overseas, as well as third service providers, in accordance with the Privacy Act. It is not practical to list all of the countries in which personal information is likely to be disclosed.

If you consent to your personal information being disclosed to an overseas recipient, and the recipient breaches the APPs, we will not be accountable for that breach under the Privacy Act, and you will not be able to seek redress under the Privacy Act. By submitting your personal information to us, you acknowledge and agree with your personal information being disclosed in countries where the level of data protection may not be commensurate with the standards imposed by the Australian Privacy Principles. Nonetheless, we will not send personal information to recipients outside of Australia unless:

- the recipient is subject to an information privacy scheme similar to the Privacy Act;

- we have taken reasonable steps to ensure that the recipient does not breach the Act and the APPs; or
- you have consented to the disclosure.

## **Direct marketing**

Accru may also use your personal information for the purpose of direct marketing without your consent if:

- the personal information does not include sensitive information;
- you would reasonably expect us to use or disclose the information for the purpose of direct marketing;
- we provide a simple way of opting out of direct marketing; and
- you have not requested to opt out of receiving direct marketing from us.

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; and
- For hard copy communications, you can email or call your local Accru office via the contact details listed in the hard copy communication received.

If we collect personal information about you from a third party, we will only use that information for the purposes of direct marketing if you have consented, or it is impracticable to obtain your consent, and we will provide a simple means by which you can easily request not to receive direct marketing communications from us. We will draw your attention to the fact that you may make such a request in our direct marketing communications.

You have the right to request us not to use or disclose your personal information for the purposes of direct marketing, or for the purposes of facilitating direct marketing by other organisations. We must give effect to the request within a reasonable period of time. You may also request that we provide you with the source of their information. If such a request is made, we must notify you of the source of the information free of charge within a reasonable period of time.

## **How do we keep personal information accurate and up-to-date?**

We are committed to ensuring that the personal information we collect, use and disclose is relevant, accurate, complete and up-to-date.

We encourage you to contact us to update any personal information we hold about you. If we correct information that has previously been disclosed to another entity, upon your request, we will also notify the other entity within a reasonable period of the correction. Where we are satisfied information is inaccurate, we will take reasonable steps to correct the information within 30 days, unless you agree otherwise. We do not charge you for correcting the information.

## **Accessing your personal information**

Subject to the exceptions set out in the Privacy Act, you may gain access to the personal information that we hold about you by contacting Accru's Privacy Officer via the details provided below. We will provide access within 30 days of your request. If we refuse to provide the information, we will provide reasons for the refusal.

We will require identity verification and specification of what information is required. An administrative fee for search and photocopying costs may be charged for providing access.

## **Dealing with Accru anonymously**

Accru does not allow clients to deal with Accru on an anonymous basis. If you choose not to provide personal information when requested, we may not be able to provide you with our services or otherwise comply with our legal obligations.

## **Incidents/Complaints handling/Making a complaint**

If you have any questions about this Privacy Policy, or wish to make a complaint about how we have handled your personal information, you can lodge a complaint with our Privacy Officer by:

- writing – PO BOX 28, Rosny Park, TAS 7018
- emailing – [info@accruhobart.com.au](mailto:info@accruhobart.com.au)

If you are not satisfied with our response to your complaint, you can also refer your complaint to the Office of the Australian Information Commissioner by:

- telephoning – 1300 363 992
- writing – Director of Complaints, Office of the Australian Information Commissioner, GPO Box 5218, SYDNEY NSW 2001
- online submission – [https://forms.business.gov.au/smartforms/landing.htm?formCode=APC\\_PC](https://forms.business.gov.au/smartforms/landing.htm?formCode=APC_PC)

## **Contractual arrangements with third parties**

We ensure that all contractual arrangements with third parties adequately address privacy issues, and we make third parties aware of this Privacy Policy.

Third parties will be required to implement policies in relation to the management of your personal information in accordance with the Privacy Act. These policies include:

- regulating the collection, use and disclosure of personal and sensitive information;
- de-identifying personal and sensitive information wherever possible;



- ensuring that personal and sensitive information is kept securely, with access to it only by authorised employees or agents of the third parties; and
- ensuring that the personal and sensitive information is only disclosed to organisations which are approved by us.

### **Changes to this Privacy Policy**

We may update our Privacy Policy from time to time. Any update will be published on the website and will apply from that date.