

# PRIVACY POLICY

GrowFWO PTY LTD

## 1. INTRODUCTION

- 1.1 In the course of our business in Australia (GROWFWO Pty Ltd and Financially Well Organised Pty Ltd), there are circumstances where we collect personal information. This privacy policy has been developed to ensure that such data is handled appropriately.
- 1.2 The Privacy Act 1988 (Cth) (Privacy Act) incorporates the Australian Privacy Principles (APPs). The APPs set out the way in which personal information must be treated. While we are not obliged to comply with the APPs, we are committed to handling your personal information in an appropriate way, as demonstrated in this policy.
- 1.3 The privacy policy also incorporates our policy on managing credit information (see particularly section 8 onwards).

### Who does this privacy policy apply to?

- 1.4 This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

### What information does the privacy policy apply to?

- 1.5 This policy applies to personal information. In broad terms, 'personal information' is information or opinions relating to a particular individual who can be identified.
- 1.6 Information is not personal information where the information cannot be linked to an identifiable individual.

## 2. HOW DO WE MANAGE THE PERSONAL INFORMATION WE COLLECT?

- 2.1 We manage the personal information we collect in numerous ways, such as by:
  - a. implementing procedures for identifying and managing privacy risks;
  - b. implementing security systems for protecting personal information from misuse, interference and loss from unauthorised access, modification or disclosure;
  - c. regularly providing staff with information bulletins and training on privacy issues;
  - d. appropriately supervising staff who regularly handle personal information;
  - e. implementing procedures for identifying and reporting privacy breaches and for receiving and responding to complaints;
  - f. appointing a privacy officer within the business to monitor privacy compliance; and
  - g. allowing individuals, the option of not identifying themselves, or using a pseudonym, when dealing with us in particular circumstances.



- 2.2 Subject to our professional obligations, we will take reasonable steps to destroy or permanently de-identify personal information if that information is no longer needed for the purposes for which we are authorised to use it.
- 2.3 In limited circumstances, it may be possible for you to use a pseudonym or remain anonymous when dealing with us. If you wish to use a pseudonym or remain anonymous you should notify us when making first enquiries or providing initial instructions. We will use our best endeavours to deal with your request, subject to our professional obligations and ability to perform the accounting service to you without using your name. In most cases, our professional obligations will require you to deal with us using your real name.
- 2.4 We are also subject to professional obligations that may affect how we deal with personal information.

### 3. WHAT KINDS OF INFORMATION DO WE COLLECT AND HOLD?

#### Personal Information

- 3.1 We may collect and hold personal information about you, which may include:
  - a. sensitive information (see below);
  - b. contact information;
  - c. financial information;
  - d. date and place of birth;
  - e. gender;
  - f. employment arrangements and history;
  - g. educational qualifications;
  - h. tax returns and tax file numbers;
  - i. insurance information;
  - j. credit information;
  - k. banking details; and
  - l. any other personal information required to perform the financial or accounting service for you.

#### Sensitive Information

- 3.2 'Sensitive information' is a subset of personal information and includes personal information that may have serious ramifications for the individual concerned if used inappropriately.
- 3.3 We may collect sensitive information if it is relevant in providing accounting or financial services (such as completing tax returns). The sensitive information we collect and hold about you may include any of the following:
  - a. health information;
  - b. membership or professional or trade associations;
  - c. membership of trade unions; and
  - d. sexual preferences or practices.
- 3.4 We will not collect sensitive information without the individual's consent to whom the information relates unless permitted under the Privacy Act.



## 4. HOW AND WHEN DO WE COLLECT PERSONAL INFORMATION?

- 4.1 Our usual approach to collecting personal information is to collect it directly from you.
- 4.2 We may also collect personal information in other ways, which may include:
  - a. from government bodies (such as the Australian Taxation Office and the Australian Securities and Investment Commission);
  - b. other entities of the FWO Group;
  - c. from paid search providers;
  - d. through referrals from individuals or other entities;
  - e. through marketing and business development events; and
  - f. from list purchases.

## 5. HOW DO WE HOLD PERSONAL INFORMATION?

- 5.1 Our usual approach to holding personal information includes:
  - a. physically:
    - i. at our premises (securely); and
    - ii. off-site; by third party physical storage providers (securely);
  - b. electronically:
    - i. in a private cloud located in Australia; and
    - ii. by a third-party data storage provider.
- 5.2 We secure the personal information we hold in numerous ways, including:
  - a. using security systems to access areas that contain personal information;
  - b. using secure servers to store personal information;
  - c. using unique usernames, passwords and other protections on systems that can access personal information; and
  - d. holding certain sensitive documents securely.

## 6. WHY DO WE COLLECT, HOLD, USE OR DISCLOSE PERSONAL INFORMATION?

- 6.1 We take reasonable steps to use and disclose personal information for the primary purpose for which we collect it. The primary purpose for which information is collected varies, depending on the particular service being provided, but is generally to provide accounting or financial services to you or your business.
- 6.2 In the case of potential employees, the primary purpose the information is collected is to assess the individual's suitability for employment.
- 6.3 Personal information may also be used or disclosed by us for secondary purposes that are within your reasonable expectations and that are related to the primary purpose of collection.
- 6.4 For example, we may collect and use your personal information:
  - a. to provide you with updates and alerts that are relevant to you or your business; and
  - b. to invite you to events.



- 6.5 We may disclose personal information to:
- a. government bodies (such as the Australian Taxation Office and the Australian Securities and Investment Commission);
  - b. our external auditors;
  - c. other service providers or referral partners in order to provide the accounting or financial service to you, or to assist our functions or activities (such as debt collection agencies or law firms);
  - d. an external service provider in India;
  - e. other entities in the FWO Group; and
  - f. out third-party technology providers such as our data storage provider and email filter providers.
- 6.6 Otherwise, we will only disclose personal information to third parties if permitted by the Privacy Act.
- 6.7 If in the unlikely event that a data breach occurs involving any personal information held by us, we will take the required steps to:
- a. assess the nature of the breach;
  - b. mitigate the risk of damage arising from the breach; and if required
  - c. notify the individuals to whom the information relates, who are at risk from the breach and the Australian Privacy Commissioner;
- as required under the Privacy Act.

## 7. WILL WE DISCLOSE PERSONAL INFORMATION OUTSIDE AUSTRALIA?

- 7.1 We do not disclose personal information outside of Australia apart from the disclosure of limited information to a service provider in India.
- 7.2 Your personal information will not be disclosed to the overseas recipient unless we are satisfied that the receiving party provides commitments to privacy and confidentiality that are at least equal to the Australian Privacy Principles or the recipient is subject to privacy protection laws that offer at least the same level of protection as required under the Privacy Act in Australia.

## 8. HOW DO WE MANAGE YOUR CREDIT INFORMATION?

### What kinds of credit information may we collect?

- 8.1 In the course of providing accounting or financial services to you, we may collect and hold the following kinds of credit information:
- a. your identification information;
  - b. information about any credit that has been provided to you;
  - c. your repayment history;
  - d. information about your overdue payments;
  - e. if terms and conditions of your credit arrangements are varied;
  - f. if any court proceedings are initiated against you in relation to your credit activities;
  - g. information about any bankruptcy or debt agreements involving you;
  - h. any publicly available information about your credit worthiness; and
  - i. any information about you where you may have fraudulently or otherwise committed a serious credit infringement.



- 8.2 We may also collect personal information that may affect your credit worthiness from other credit providers (e.g. banks) that collect that information from credit reporting bodies. The kinds of personal information we collect may include any of those kinds of personal information outlined in section 3.1 of this policy.

#### **How and when do we collect credit information?**

- 8.3 In most cases, we will only collect credit information about you if you disclose it to us and it is relevant in providing you with the accounting or financial service.
- 8.4 other sources we may collect credit information from include:
- a. government bodies (such as the Australian Taxation Office, Australian Securities and Investment Commission and the Australian Bureau of Statistics);
  - b. banks and other credit providers; and
  - c. your suppliers and creditors.
- 8.5 We do not collect and hold credit information from credit reporting bodies unless it is incidentally collected in providing the accounting or financial service to you.

#### **How do we store and hold the credit information?**

- 8.6 We store and hold credit information in the same manner as outlined in section 5 of this policy.

#### **Why do we collect the credit information?**

- 8.7 Our usual purpose of collecting, holding, using and disclosing credit information about you is to enable us to provide you with the accounting or financial service.
- 8.8 We may also collect the credit information:
- a. to process payments; and
  - b. for other purposes incidental to our services as professional accountants.

#### **Overseas disclosure of the credit information**

- 8.9 We will not disclose your credit information to entities without an Australian link unless you expressly request us to.

#### **How can I access my credit information, correct errors or make a complaint?**

- 8.10 You can access and correct your credit information, or complain about a breach of your privacy in the same manner as set out in section 9 of this policy.

## **9. HOW DO YOU MAKE COMPLAINTS AND ACCESS AND CORRECT YOUR PERSONAL INFORMATION OR CREDIT INFORMATION?**

- 9.1 It is important that the information we hold about you is up-to-date. You should contact us if your personal information changes.

#### **Access to information and correcting personal information**

- 9.2 You may request access to the personal information held by us or ask us for your personal information to be corrected by using the contact details in this section.



- 9.3 We will grant you access to your personal information as soon as possible, subject to the request circumstances.
- 9.4 In keeping with our commitment to protect the privacy of personal information, we may not disclose personal information to you without proof of identity.
- 9.5 We may deny access to personal information if:
- a. the request is unreasonable;
  - b. providing access would have an unreasonable impact on the privacy of another person;
  - c. providing access would pose a serious and imminent threat to the life or health of any person
  - d. providing access would compromise our professional obligations; or
  - e. there are other legal grounds to deny the request.
- 9.6 We may charge a fee for reasonable costs incurred in responding to an access request. The fee (if any) will be disclosed prior to it being levied.
- 9.7 If the personal information we hold is not accurate, complete and up-to-date, we will take reasonable steps to correct it so that it is accurate, complete and up-to-date, where it is appropriate to do so.

### Complaints

- 9.8 If you wish to complain about an interference with your privacy, then you must follow the following process:
- a. the complaint must be firstly made to us in writing, using the contact details in this section. We will have a reasonable time to respond to the complaint.
  - b. In the unlikely event the privacy issue cannot be resolved, you may take your complaint to the Office of the Australian Information Commissioner.

### Who to contact

- 9.9 A person may make a complaint or request to access or correct personal information about them held by us. Such a request must be made in writing to the following address:

**Privacy Officer:** Christina Manderson  
**Postal Address:** GPO Box 81, Brisbane QLD 4001  
**Telephone Number:** 07 3833 3999  
**Email Address:** info@fwoca.com.au

## 10. CHANGES TO THE POLICY

- 10.1 We may update, modify or remove this policy at any time without prior notice. Any changes to the privacy policy will be published on our website.
- 10.2 This policy is effective April 2018. If you have any comments on the policy, please contact the privacy officer with the contact details in section 9 of this policy.

