

Privacy Policy

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1 Your rights in relation to privacy

UHY Haines Norton PRT understands the importance of protecting the privacy of an individual's personal information. This policy sets out how UHY Haines Norton PRT aims to protect the privacy of your personal information, your rights in relation to your personal information managed by UHY Haines Norton PRT and the way UHY Haines Norton PRT collects, holds, uses and discloses your personal information.

UHY Haines Norton PRT is an association of independent accounting and consulting firms with nine offices around Australia and New Zealand. In this policy, UHY Haines Norton PRT means each Australian UHY Haines Norton PRT entity and associated entity and each Australian UHY Haines Norton PRT office, including without limitation UHY Haines Norton PRT.

In handling your personal information, UHY Haines Norton PRT will comply with the *Privacy Act 1988* (Cth) (Privacy Act) and with the 13 Australian Privacy Principles in the Privacy Act. This policy may be updated from time to time.

2 What kinds of personal information does UHY Haines Norton PRT collect?

Personal information is information or an opinion about an identified, or reasonably identifiable, individual. During the provision of its services, UHY Haines Norton PRT may collect your personal information.

Generally, the kinds of personal information UHY Haines Norton PRT collects 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 UHY Haines Norton PRT;
- 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 UHY Haines Norton PRT to provide its services to you; and
- other information relevant in the circumstances.

3 How does UHY Haines Norton PRT collect personal information?

Generally, UHY Haines Norton PRT collects your personal information directly from you, through the completion of online forms, or exchange in person or by way of telephone, facsimile, email, post or through the use of the UHY Haines Norton PRT website.

There may be occasions when UHY Haines Norton PRT collects your personal information from other sources such as:

- from your employer or former employer, where necessary for UHY Haines Norton PRT to provide its services to you;
- from a bank, fund manager, insurance provider, or superannuation or other product issuer;
- from government or regulatory bodies;
- from an information services provider;
- from a publicly maintained record or other publicly available sources of information including social media and similar websites; and
- if for recruitment purposes, an external recruitment or background screening services provider.

Generally, UHY Haines Norton PRT will only collect your personal information from sources other than you if it is unreasonable or impracticable to collect your personal information from you or if you consent or it is otherwise required by law.

4 Why does UHY Haines Norton PRT need your personal information?

UHY Haines Norton PRT collects, holds, uses and discloses your personal information for a number of purposes including, but not limited to, the following:

- to provide professional services, including services in audit and assurance, accounting and taxation, business improvement, migrant advice, business valuations, corporate advisory, due diligence, litigation support, superannuation, estate and succession planning, and specialist tax consulting;
- accounting, billing and other internal administrative purposes;
- to respond to requests or queries;
- to maintain contact with clients;
- to notify clients of seminars and other events and to seek feedback;

- identifying and informing you of services that may be of interest to you;
- assessing your application for employment with UHY Haines Norton PRT or otherwise for the purpose of engaging you as a contractor or consultant;
- to manage any conflict of interest or independence issues;
- to conduct surveys;
- to meet any regulatory obligations;
- as part of a corporate transaction; and/or
- for any other business-related purposes.

UHY Haines Norton PRT may also use your personal information for purposes related to the above purposes and for which you would reasonably expect UHY Haines Norton PRT to do so in the circumstances, or where you have consented or the use is otherwise in accordance with law.

Where personal information is used or disclosed, UHY Haines Norton PRT takes steps reasonable in the circumstances to ensure it is relevant to the purpose for which it is to be used or disclosed. You are under no obligation to provide your personal information to UHY Haines Norton PRT. However, without certain information from you, UHY Haines Norton PRT may not be able to provide its services to you.

5 To whom does UHY Haines Norton PRT disclose your personal information?

UHY Haines Norton PRT discloses your personal information for the purpose for which Haines Norton PRT collects it. That is, generally, UHY Haines Norton PRT will only disclose your personal information for a purpose set out at paragraph 4. This may include disclosing your personal information to:

- third parties engaged to perform administrative or other business management functions;
- business partners and associates;
- people or entities considering acquiring an interest in UHY Haines Norton PRT's enterprise or assets;
- UHY Haines Norton PRT's professional advisors, contractors, consultants and related bodies corporate;
- banks, fund managers, insurance providers, and superannuation and other product providers;

- other parties in the context of a corporation transaction;
- government or regulatory bodies; and
- any other entity, with your consent, or to whom disclosure is required or authorised by law.

UHY Haines Norton PRT's disclosures of your personal information to third parties are on a confidential basis or otherwise in accordance with law. UHY Haines Norton PRT may also disclose your personal information with your consent or if disclosure is required or authorised by law.

6 Overseas disclosure

Where it is necessary to make any overseas disclosures, UHY Haines Norton PRT will take steps reasonable in the circumstances to ensure the overseas recipient complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme unless you consent to the overseas disclosure or it is otherwise required or permitted by law.

7 Direct marketing

UHY Haines Norton PRT may use and disclose your personal information in order 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 UHY Haines Norton PRT via the contact details set out in paragraph 10 or through any opt-out mechanism contained in a marketing communication to you.

8 Security of your personal information

UHY Haines Norton PRT takes steps reasonable in the circumstances to ensure that the personal information it holds is protected from misuse, interference and loss and from unauthorised access, modification or disclosure. UHY Haines Norton PRT holds personal information in both hard copy and electronic forms in secure databases on secure premises, accessible only by authorised staff. Staff are bound by security policies and confidentiality agreements, which are regularly revised and re-issued.

UHY Haines Norton PRT will destroy or de-identify personal information in circumstances where it is no longer required, unless UHY Haines Norton PRT is otherwise required or authorised by law to retain the information.

9 Can you access and correct the personal information that UHY HAINES NORTON PRT holds about you?

UHY Haines Norton PRT takes steps reasonable in the circumstances to ensure personal information it holds is accurate, up-to-date, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that is collected and held by UHY

Haines Norton PRT. If at any time you would like to access or correct the personal information that UHY Haines Norton PRT holds about you, or you would like more information on UHY Haines Norton PRT's approach to privacy, please contact one of UHY Haines Norton PRT's Privacy Compliance Officers on the details set out in paragraph 10 below. UHY Haines Norton PRT will grant access to the extent required or authorised by the Privacy Act or other law and take steps reasonable in the circumstances to correct personal information where necessary and appropriate.

To obtain access to your personal information:

- you will have to provide proof of identity to ensure that personal information is provided only to the correct individuals and that the privacy of others is protected;
- UHY Haines Norton PRT requests that you be reasonably specific about the information you require; and
- UHY Haines Norton PRT may charge you a reasonable administration fee, which reflects the cost to UHY Haines Norton PRT, for providing access in accordance with your request.

If UHY Haines Norton PRT refuses your request to access or correct your personal information, UHY Haines Norton PRT will provide you with written reasons for the refusal and details of complaint mechanisms. UHY Haines Norton PRT will also take steps reasonable in the circumstance to provide you with access in a manner that meets your needs and the needs of UHY Haines Norton PRT.

UHY Haines Norton PRT will endeavour to respond to your request to access or correct your personal information within 30 days from your request.

10 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 one of UHY Haines Norton PRT's Privacy Compliance Officers as follows:

Michelle Bowman

mbowman@uhyhnprt.com.au

11 Privacy complaints

Please direct all privacy complaints to one of UHY Haines Norton PRT's Privacy Compliance Officers. At all times, privacy complaints:

- will be treated seriously;
- will be dealt with promptly;

- will be dealt with in a confidential manner; and
- will not affect your existing obligations or affect the commercial arrangements between you and UHY Haines Norton PRT.

The UHY Haines Norton PRT Privacy Compliance Officer will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. In the event that you are dissatisfied with the outcome of your complaint, you may refer the complaint to the Office of the Australian Information Commissioner.

UHY Haines Norton PRT Suite 3 46-48 Albert Street BUSSELTON WA 6280

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