#### 1. Introduction

This document is the **VISION BEYOND ADVISORY** Privacy Policy ("**Policy**"), which applies under the Australian Privacy Principles.

The Policy sets out how Vision Beyond Advisory collects and processes Information about you, when you engage with us. For example, if you instruct us to provide accounting or taxation services to you or any entity you control; or if you visit our website. By continuing to engage with us, you consent to your Information being collected, processed and/or shared in accordance with this Policy.

### 2. <u>Information we collect</u>

We collect two types of information: Personally Identifiable Information – this is any information that, by itself, identifies you or would easily enable someone to contact and/or identify you, such as your name, Tax File Number, email address or phone number; and Non-Personally Identifiable Information – this refers to all other information about you that you may provide to us or that we may collect from you.

In this Policy, both kinds are known as "Information".

You may actively give us Information about yourself when you instruct us to act to provide accounting or taxation services to you. This may include preparation of financial statements and tax returns for you or any related entity or related family member. In this Policy, these types of engagements with us are known as "Engagements".

The Information that you provide may include, but not be limited to, your name, gender, date of birth, residential address, occupation, email address, telephone number, delivery address, billing address and payment information, Tax File Number, companies that you are a director or shareholder of, and trusts that you are a trustee or beneficiary of.

We collect Information automatically through the use of various online technologies, including through cookies.

We acquire Information from other trusted sources (including, for example, business partners, credit agencies, and the Australian Taxation Office). Where permitted by law, we may combine this Information we receive from other sources, and with Information you give to us or that we collect about you.

You can contact us to receive a copy of the Personally Identifiable Information we collect from you and correct, amend, or delete Personally Identifiable Information that is inaccurate.

It is your responsibility to ensure that you submit true, accurate and complete Information to us and keep it up to date. You may also update your Personally Identifiable Information by contacting us through the contact details provided below.

## How we use, share and disclose your Information

We may use your Information for the purposes of enabling you to use our Engagements, enabling us to fulfil our contractual obligations to you (such as to provide accounting services to you).

We may also use the Information we collect to administer our Engagements for internal purposes, including troubleshooting purposes; optimise or improve our services, operations, and Engagements; as part of our effort to keep our Engagements safe and secure; to measure or understand the

effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; to communicate with you about the services we provide to you, and send you information about features on our Engagements or changes to our policies; to provide you with advertising based on your activity on our Engagements and on third-party sites and Engagements; to make suggestions and recommendations to you and other users of our Engagements about services that may interest you or them; and to detect, investigate and prevent activities that may violate our policies or be illegal.

#### 3. User choice, including how to opt in or opt out from direct marketing

As noted above, we, and selected third parties with whom we share your Information, may use your Information for direct marketing purposes, including to provide updates, newsletters, events or other communications that we think may interest you. Where required by law, your prior consent will be obtained before we send direct marketing. In any event, we will offer you the option to unsubscribe from electronic marketing materials. If you do not wish us to share your Personally Identifiable Information with third parties for their marketing purposes, please contact us by way of the contact details provided below.

#### 4. Data Security and Retention

We apply appropriate security measures aimed at protecting your Personally Identifiable Information that is under our control from unauthorised access, collection, use, disclosure, copying, modification or disposal. [Confirm] We will notify you in compliance with applicable law regarding any data breach. Where you have a password that enables you to access our Engagements, you are responsible for keeping this password secure and confidential. Please be advised that we may retain some personal information after you cease to be a client, for example if necessary to meet our legal obligations or for tax and accounting purposes.

## 5. <u>Use of Engagements by minors</u>

The features, programs, promotions and other aspects of our Engagements requiring the submission of Personally Identifiable Information are not intended for young children. We do not knowingly collect Personally Identifiable Information from children under the age of 16. If you are a parent or guardian of a child under the age of 16 and believe he or she has disclosed Personally Identifiable Information to us please contact us by way of the contact details below. A parent or guardian of a child under the age of 16 may review and request deletion of such child's Personally Identifiable Information as well as prohibit the use of that Information.

## 6. Online Tracking – Cookies and other technologies

We may use third party tools to make the advertising we show you on our Engagements and/or our partner websites more relevant and interesting to you. For this purpose, we use cookies, flash cookies, web beacons or similar technologies to collect Information about your browsing behaviour, and deliver interest-based ads to you. A cookie is a text file containing small amounts of information that a website can send to your browser, which may then be stored on your computer as a tag that distinguishes your computer but does not name you. You can set your browser to notify you before you receive a cookie, giving you the chance to decide whether to accept it. You can also set your browser to turn off cookies; however, if you do this, some of the features of our Engagements may not work properly. You can also reject certain cookies served through Engagements by opting out on the website of the third party placing the cookie, which you can identify through your browser.

### 7. <u>Changes to the Policy</u>

This Policy was last updated in June 2019. A notice will be posted on our Engagements for 30 days whenever this Policy is changed in a material way. By continuing to use our Engagements you confirm your acceptance of the relevant changes.

## 8. <u>Complaints about privacy</u>

If you believe that we have breached the Australian Privacy Principles or this Policy, or you have any concerns about how your Information will be used, please contact us by way of the contact details provided below. We will respond to your complaint within 30 days. If our response does not satisfy you, you may apply to the Office of the Australian Information Commissioner.

### 9. Overseas disclosure

We do not anticipate that any Information is likely to be disclosed to overseas recipients in countries within which we do not operate.

### **Questions about this Policy**

If you have a question or concern about this Policy or our handling of your Information, you can contact us by way of the contact details provided below.

# **Vision Beyond Advisory**

Telephone (08) 8284 3208 Adelaide, South Australia