

PRIVACY POLICY

1. INTRODUCTION

Felix Partners Pty Ltd (ABN 80 790 995 365) ("Felix Partners", "we", "us", or "our") is committed to protecting the privacy and security of your personal information. We are bound by the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

This Privacy Policy explains how we collect, use, disclose, and securely store your personal information, including when you interact with our website, engage our services, or work with an independent professional practitioner operating on our platform.

2. OUR HUB-AND-SPOKE PLATFORM MODEL

Felix Partners operates a professional services platform (the "Hub") providing technology, branding, and administrative infrastructure to independent professional practitioners (the "Spokes").

When you engage a Spoke for services (such as tax, accounting, or advisory), you are engaging that practitioner directly. However, your data is securely hosted within the Felix Partners shared technology environment. We enforce strict data segregation, ensuring that practitioners can only access the files and information of their specific clients.

3. INFORMATION WE COLLECT

We only collect personal information that is reasonably necessary for our business activities. The types of information we may collect include:

- **Contact Information:** Name, residential and postal addresses, email address, and telephone numbers.
- **Financial and Corporate Information:** Bank account details, financial statements, payroll data, company structures, and asset holdings.
- **Government Identifiers:** Tax File Numbers (TFNs), Australian Business Numbers (ABNs), and Director ID numbers. (Note: TFNs are handled in strict compliance with the Privacy (Tax File Number) Rule 2015).
- **Identity Verification Data:** Dates of birth, driver's licences, and passport details required for Anti-Money Laundering (AML) and counter-terrorism financing compliance.
- **Website Data:** IP addresses, browser types, and cookie data collected when you visit our website.

4. HOW WE COLLECT YOUR INFORMATION

We typically collect personal information in the following ways:

- **Directly from you:** When you fill out contact forms on our website, sign an engagement letter, or provide documents to us or one of our Spokes.
- **From our Platform Practitioners (Spokes):** When an independent practitioner on our platform securely uploads your data to our document and practice management systems.

- **From Third Parties:** Such as the Australian Taxation Office (ATO), ASIC, your bank, or cloud accounting software (e.g., Xero), where you have provided authorisation.

5. HOW WE USE AND DISCLOSE YOUR INFORMATION

We use and disclose your personal information for the primary purpose of delivering professional services and managing our platform, including:

- Facilitating the provision of accounting, tax, legal, and advisory services to you.
- Lodging statutory forms and returns with government bodies (e.g., ATO, ASIC).
- Managing invoicing, billing, and platform administration.
- Verifying your identity and complying with legal and regulatory obligations.

Disclosure to Third Parties:

We will never sell your personal information. We may disclose your information to:

- The specific independent practitioner (Spoke) you have engaged.
- Regulatory bodies and government agencies as required by law.
- Secure third-party cloud service providers (e.g., practice management, document storage, and accounting software providers) who support our platform infrastructure.

6. DATA SECURITY AND STORAGE

We take our data security obligations extremely seriously. We take reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Our security measures include:

- **Mandatory Multi-Factor Authentication (MFA):** Enforced across all user accounts on our platform.
- **Strict Data Segregation:** System-level restrictions ensuring independent practitioners can only view their own clients' data.
- **Encryption and Secure Cloud Hosting:** Utilising reputable, ATO-aligned cloud software providers.
- **Staff and Practitioner Training:** Enforcing strict confidentiality and acceptable use policies across our network.

7. OVERSEAS DISCLOSURE

We use leading cloud-based software to deliver our services. As a result, some of your personal information may be stored on secure servers located outside of Australia (for example, in the United States or the European Union). We ensure that any overseas third-party providers are subject to strict privacy and data security standards comparable to the Australian Privacy Principles.

8. ACCESSING AND CORRECTING YOUR INFORMATION

You have the right to request access to the personal information we hold about you and to ask for it to be corrected if you believe it is inaccurate, incomplete, or out of date.

To request access or correction, please contact your primary Felix Partners practitioner (Spoke) or reach out to our central privacy officer using the details below. We will respond to your request within a reasonable timeframe.

9. PRIVACY COMPLAINTS

If you have a concern or complaint about how we have handled your personal information, please contact us in writing. We will investigate your complaint and provide a written response outlining our findings and proposed resolution.

If you are not satisfied with our response, you may escalate your complaint to the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

10. CONTACT US

If you have any questions about this Privacy Policy or our data practices, please contact us at:

Felix Partners Pty Ltd

Address: Level 27, 101 Collins Street, Melbourne VIC 3000

Email: talktous@felixpartners.com.au

Phone: 03 9653 7300

This Privacy Policy was last updated in August 2026. We may update this policy from time to time by publishing a new version on our website.