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PRIVACY POLICY

Version 2 - July 2026

Executive summary

For Slack-Smith Partners (ACN 632 268 716) to provide tax, accounting, legal and advisory services, we collect and hold personal and financial information about our clients, their related parties, our employees and our contacts. Protecting that information is fundamental to our professional obligations and to the trust our clients place in us.

In this brief, we explain how we manage your information:

- **What we collect:** Identity, contact, financial and taxation information needed to deliver our services, including identification information required under the Anti-Money Laundering & Counter-Terrorism (AML/CTF) laws.
- **Why we collect it:** To accurately provide the professional services you engage us for, to meet our legal and regulatory obligations and to administer our business.
- **Who can access it:** Our Australian staff and with your consent given in our engagement documents our extended service delivery team in India and the carefully selected technology providers who support our systems.
- **How we use technology:** We use secure cloud software and AI-assisted tools to assist in preparing work for our staff. Every output is reviewed by our staff before being finalised; no significant decision are made by a machine learning alone.
- **How we protect it:** Layered technical and organisational controls. This includes access restrictions, multi-factor authentication (MFA), encryption, staff confidentiality obligations and vendor due diligence overseen by our Privacy Officer.
- **Your rights:** you can access and correct your information, opt out of marketing, and raise concerns with us or with the Office of the Australian Information Commissioner (OAIC).

How this policy is organised

Section	What it covers
1. Our regulatory and professional framework	The laws, professional codes and regulators that govern how we handle your information.
2. Collection and use of personal information	What we collect, how, and the purposes we use it for.
3. Use of artificial intelligence and automated tools	How AI assists our staff, and the human review that applies to all work.
4. Disclosure of personal information	Who we may share information with, and on what conditions.

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5. Our extended team in India	The role of our offshore team, and the supervision and safeguards that apply.
6. Cloud storage and overseas data locations	Where data is stored and how we verify our providers.
7. Your consent	How and when we obtain your permission for these arrangements.
8. Security, breaches and retention	How we protect information, respond to incidents, and how long we keep records.
9. Access, corrections and complaints	Your rights and how to contact our Privacy Officer or the OAIC.

1. Our regulatory and professional framework

Slack-Smith Partners is not only bound by privacy law. As a firm of Chartered Accountants Australia & New Zealand (CA ANZ) and a registered tax agent, our handling of your information is governed by an overlapping framework of legislation, professional codes and regulator guidance. The key obligations are:

Framework	Regulator / body	What it requires of us
Privacy Act (1988) and the Australian Privacy Principles (APPs)	Office of the Australian Information Commissioner (OAIC)	Open and transparent management of personal information, including this policy (APP 1), limits on collection, use and disclosure, cross-border disclosure safeguards (APP 8), security (APP 11) and the Notifiable Data Breaches scheme.
Tax Agent Services Act 2009 — Code of Professional Conduct, and the Tax Agent Services (Code of Professional Conduct) Determination 2024	Tax Practitioners Board (TPB)	Confidentiality of client information, no disclosure to any third party without your permission or a legal duty (Code item 6); competent service and adequate supervision and control of anyone working on your affairs, including offshore team members and technology tools (Code item 7).
APES 110 Code of Ethics for Professional Accountants (including Independence Standards)	Accounting Professional & Ethical Standards Board (APESB) & the Chartered Accountants Australia and New Zealand (CA ANZ)	The fundamental principle of confidentiality, respecting the confidentiality of information acquired through professional relationships, within the firm and with third parties.

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APES GN 30 Outsourced Services and APES 305 Terms of Engagement	APESB / CA ANZ	Due diligence over outsourced service providers, and documenting and communicating to clients the provider, the geographic location where outsourced work is performed, and the nature and extent of the outsourced services.
Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (as extended to accounting services from 1 July 2026)	AUSTRAC	Customer identification and verification, ongoing due diligence, and reporting obligations which require us to collect and retain additional identification information from clients.

2. Collection of personal information

Slack-Smith Partners collects and holds personal information from clients, employees and contacts where it is necessary for us to provide professional services or to meet our legal obligations. We do not collect information unless we ask or have your consent first. Most information is collected through forms, meetings, email, telephone, our client portal or secure document exchange. With your authority, we may also collect information from third parties such as the Australian Taxation Office (ATO), your bank, financial adviser or previous accountant. Examples of the types of information we collect include:

- Your individual and/or entity identity and contact details
- Gender and date of birth
- Financial and income information
- Government identifiers such as tax file numbers (where necessary)
- Identification documents and verification information required under anti-money laundering and counter-terrorism financing (AML/CTF) laws, which apply to accounting firms from 1 July 2026
- Asset and share registry information
- Personal health information for insurance purposes and Medicare numbers
- Details of your spouse and dependants
- Details of your estate planning
- Other information as required by taxation and other laws

We may collect sensitive information about you. Such information will only be collected where it is necessary for the performance of our services and with your consent, or where the collection is required or authorised by law.

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You are under no obligation needing to provide us with your personal information. However, if you choose not to provide it, we may be unable to provide the services requested, and in some cases the law (including AML/CTF law) may prevent us from acting for you.

Use of personal information

Slack-Smith Partners collects personal information to provide you with a specific service. The main reasons we hold and use your information include:

- Providing you with professional services as requested by you
- Maintaining contact with our clients, employees and contacts
- Meeting government body and regulator reporting requirements, including obligations to the ATO, ASIC and AUSTRAC
- Administering and managing our services, including charging, billing and collecting debts
- Maintaining and developing our business systems and infrastructure, including the secure technology tools described in this policy
- Recruitment purposes

Your personal information may also be used to send you information regarding our services, legislative changes that may impact you or your business, and industry information or events. You may opt out of marketing or promotional material at any time by contacting our Privacy Officer.

3. Use of Artificial Intelligence (AI)

Slack-Smith Partners uses secure, professional-grade software, including tools that incorporate artificial intelligence (AI), to assist our staff in delivering services efficiently and accurately. These tools may assist with tasks such as preparing workpapers, reviewing accounting data or drafting documents for professional review, and identifying items that require the attention of our staff.

Following the Tax Practitioners Board's guidance, AI does not reduce or transfer a tax practitioner's professional responsibilities. We agree, and we operate on the same principle where AI-assisted tools are used in our work:

- Every output is reviewed by qualified staff member before it is finalised sent for signing or lodged. AI tools assist our people; they do not replace professional judgement within our work, and we remain fully accountable for the accuracy and quality of the services we provide.
- No decision that could significantly affect your rights or interests is made solely by an automated system.

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- We use AI tools under commercial arrangements that meet our security and confidentiality requirements, and we conduct due diligence on those providers. Your personal information is not used to train publicly available AI models.
- Access to client information within these tools is restricted to authorised personnel and protected by the security controls described in this policy.
- We assess the privacy impacts of new technology before adopting it, and we review our tools and this policy as regulator guidance evolves which includes the TPB's guidance on AI and the Code of Professional Conduct, and the OAIC's guidance on the new automated decision-making transparency requirements in the Privacy Act that commence on 10 December 2026.

If you have questions about our use of these tools in connection with your information, please contact our Privacy Officer.

4. Disclosure of personal information

Slack-Smith Partners does not disclose your personal information to any third party unless you have given your permission, it is necessary to fulfil our services to you (as instructed and consented to in our engagement & onboarding documents), we are required or permitted to do so by law, regulation or professional standards. This reflects both the Privacy Act and item 6 of the Code of Professional Conduct under the Tax Agent Services Act, which binds us as a registered tax agent.

With your consent, the third parties who may access personal information held by us include:

- Our extended service delivery team in India (see the following section)
- Independent contractors and consultants engaged by the firm
- Information technology and software providers, including cloud and AI service providers described in this policy
- Offsite security storage providers
- Event managers, credit managers and debt collecting agencies

We require our service providers to adhere to strict privacy and confidentiality requirements and not to keep, use or disclose personal information we provide to them for any unauthorised purpose. We may also share non-personal, non-identifiable and aggregated information for research or business development purposes. We do not sell, rent or trade your personal information.

We may disclose personal information without your consent where we have a legal duty to do so, for example, in response to a statutory notice from the ATO or the TPB, or to meet our reporting obligations to AUSTRAC.

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5. Slack-Smith Partners Team in India

Slack-Smith Partners' team includes professional staff located in India. Unlike a lot of outsourcing arrangements, our India team is not a third-party provider serving multiple clients they are part of Slack-Smith Partners, employed within our firm, working exclusively on our engagements, and integrated into our workflows, systems and quality standards.

Our India-based team members assist our Australian staff with accounting and administrative support work, such as data processing, bookkeeping support and the preparation of draft workpapers, under the direction and supervision of our Australian office.

Because our India team members are located overseas, we treat the arrangement with the same rigour the law and our professional standards require of any offshore arrangement:

- Your consent first. We will not make your information available to our India-based team unless you have consented, which we obtain through our engagement letter or other signed acknowledgement before work begins. Our engagement documents describe what information is involved, who will have access to it, and where the work is performed.
- One firm, one standard. All work performed in India is allocated, directed and reviewed by qualified staff in our Australian office. Responsibility for the professional service you receive always remains with Slack-Smith Partners in Australia, consistent with our supervision and control obligations under Code item 7 of the Code of Professional Conduct.
- The same confidentiality obligations. Our India-based team members are bound by the same written confidentiality obligations as our Australian staff and receive the same training on privacy and confidentiality requirements.
- Controlled access. Team members access our systems through secured, access-controlled accounts protected by multi-factor authentication. Client information remains within Slack-Smith Partners' systems at all times; it is not downloaded to, or stored on, local devices in India, and it is never shared with any other organisation.
- Ongoing oversight. We review the team's security arrangements, training and performance on an ongoing basis, in line with the standards in APES GN 30 and the TPB's guidance on offshore staffing.

6. Cloud storage and overseas data locations

We use reputable cloud software providers to run our practice including accounting, document management and practice management platforms. Where personal information is stored in Australia, the APPs apply automatically. Some of our providers store or process data at overseas data centres, most commonly located in the United States, the United Kingdom, Singapore and New Zealand.

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Before disclosing personal information to an overseas recipient, APP 8 requires us to take reasonable steps to ensure the recipient does not breach the APPs in relation to that information. In practice, our reasonable steps are:

- Selecting established providers and reviewing their security certifications and assurance reports (such as SOC 2 reports or ISO 27001 certification) and their privacy terms before adoption.
- Contractual terms with providers restricting the use and disclosure of our data to the provision of the service.
- Technical controls on our side, the use of multi-factor authentication, role-based access and encryption of data in transit. Ensuring that overseas storage does not weaken access security.
- Periodic review of each provider's data hosting locations, terms and security posture, coordinated by our Privacy Officer.

The use of an overseas provider does not change our accountability for your information. Our confidentiality obligations under APES 110 and the Code of Professional Conduct continue to apply regardless of where data is physically stored.

7. Your consent

This Privacy Policy explains our information handling practices, but it is not how we obtain your consent. Consistent with item 6 of the TPB's Code of Professional Conduct and APES 305 Terms of Engagement, your informed consent to the disclosures described in this policy including to our India team and our cloud and AI service providers is obtained through our engagement letter or another signed acknowledgement before we begin acting for you. Those documents describe the nature of the disclosures, the entities involved and the locations where work is performed and data is stored.

If the arrangements described in your engagement documents change in a material way, we will tell you and where required, seek your consent again. You may withdraw or limit your consent at any time by contacting us, although this may affect the services, we are able to provide.

8. Security of Personal Information

Slack-Smith Partners implements layered measures to protect your personal information against misuse, interference, loss, unauthorised access or data breaches/modification, in both the physical and electronic environment. Our measures include:

- Confidentiality clauses in employee and contractor agreements in Australia and India as well as training on privacy obligations
- Appropriate security access to Slack-Smith Partners premises

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- Password management and role-based access controls restricting access to systems and databases to authorised personnel
- Multi-factor authentication on our core business systems
- Encryption of data in transit between our systems and our cloud providers
- Shredding for the disposal of written information
- Regular backups of electronic information, stored both locally and in the cloud
- Firewalls, antivirus and malware protection
- Due diligence and security requirements imposed on our technology, AI and outsourced service providers

This Privacy Policy applies to any personal information we collect via our website, client portal or social media sites. Our website may log certain statistics about users, but this information does not specifically identify an individual. In some cases, cookies may be used on our website; you can configure your browser to reject or delete cookies.

Retention of personal information

Various laws impose different retention requirements, including taxation law, the Corporations Act and, from 1 July 2026, AML/CTF record-keeping obligations. Depending on the context, we are required to retain your information for periods of between five years and permanently. Where your information is no longer used, needed or required to be retained, we will take all reasonable steps to destroy or permanently de-identify it.

9. Access, corrections and contact details

You can request access at any time to the personal information we hold about you (except in limited circumstances where we are permitted to withhold it, for example where granting access would infringe another person's privacy). If you make a request, we may ask you to provide identification, such as a driver's licence or passport, so we can verify you are the person to whom the information relates to.

We take all reasonable steps to ensure the personal information we hold is accurate, complete and up to date. If you believe information, we hold about you is incorrect or out of date, or you have concerns about how we are handling your personal information, please contact our Privacy Officer. If you wish to have your personal information deleted, let us know and we will take reasonable steps to delete it, unless we need to keep it for legal, auditing or internal risk management reasons.

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Complaints

If you have queries about this Privacy Policy, or a problem or complaint, please contact our Privacy Officer. We take complaints seriously and will respond promptly. If you are not satisfied with our handling of your complaint, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au or on 1300 363 992.

Contact details:

PO Box 35, Tamworth NSW 2340

P: 02 6761 3461

E: tamworth@slacksmithpartners.com.au

Changes to this Privacy Policy

We review this Privacy Policy regularly and amend it as our practices, technology and regulatory obligations evolve including the Privacy Act reforms, TPB guidance on AI, and the AML/CTF regime. The current version is published on our website at www.slacksmithpartners.com.au.

Material changes affecting how we handle your information will also be communicated through our engagement processes.