

# SLACK-SMITH

## PARTNERS

### PRIVACY POLICY

#### Slack-Smith Partners Privacy Policy

Introduction Slack-Smith Partners Pty Ltd (ACN: 632 268 716) and any other entity owned or controlled by Slack-Smith Partners Pty Ltd (together "Slack-Smith Partners") believes the responsible use of personal information is critical to the business objectives of our clients and the firm. Slack-Smith Partners is committed to protecting your privacy and handling personal information in an open and transparent way. We are also committed to complying with the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APP's). This privacy policy explains how Slack-Smith Partners collects, uses, discloses, handles and secures personal information which includes sensitive information. It also explains how you access and correct personal information. Slack-Smith Partners will update this Privacy Policy as required. If it changed, an updated copy will be posted on our website. Any changes are administered by our privacy officer.

Collection of personal information Slack-Smith Partners collects and holds personal information from clients, employees and contacts. We collect and hold this information when it is necessary for us to provide you with professional services. We do not collect information unless we ask you for it first. Most information will be collected directly from individuals when we deal with them. The personal information collected may be provided in forms filled out by individuals, face to face meetings, email messages or telephone conversations. If you contact us, we may keep a record of that contact. Examples of the types of information we collect can include but is not limited to:

- Your Individual and/or entity identity and contact details
- Gender
- Date of Birth
- Financial and income information
- Government identifiers like tax file numbers (when necessary)
- Asset and share registry information
- Personal health information for insurance and Medicare numbers
- Details of spouse and dependents
- Details of your estate planning
- Other information as required by taxation and other laws Slack-Smith Partners may collect sensitive information about you. Such information will only be collected if it is necessary for the performance of our services. We will only collect this information with your consent.

# SLACK-SMITH

## PARTNERS

### PRIVACY POLICY

You are under no obligation to provide us with your personal information. However, if you choose not to provide us with that information, we may be unable to provide the services requested.

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 can include but is not limited to:

- To provide you with professional services as requested by you
- Maintain contact with our clients, employees and contacts
- Government body and regulator reporting requirements
- Administer and manage services including charging, billing and collecting debts
- Maintaining and developing our business systems and infrastructure
- Recruitment purposes Your personal information may be used to send you information regarding our services, legislative changes that may impact on you or your business and current information regarding our industry or events that we may be holding. You may notify us at any time that you do not wish to receive marketing or promotional material by contacting our Privacy Officer.

Disclosure of personal information Slack-Smith Partners does not routinely disclose your personal information to other organisations, unless you have given your consent, it is necessary to fulfill our services to you (as instructed) or it is permitted by law, regulation or professional standard. As part of the provision of our services and business operations it may be necessary to allow individuals or organisations outside of Slack-Smith Partners to access personal information held by us. This may include, but is not limited to, independent contractors and consultants, offsite security storage providers, information technology providers, event managers, credit managers and debt collecting agencies. We require our service providers to adhere to our privacy guidelines and not to keep, use or disclose personal information we provide to them for any unauthorised purposes. Slack-Smith Partners may also share non personal, non-identifiable and aggregated information for research or business development purposes. We do not sell, rent, trade or otherwise supply to third parties your personal information. Trans Border Data Flows Slack-Smith Partners will only transfer personal information about an individual to a third party who is in a foreign country in specified circumstances. This would include:

# SLACK-SMITH

## PARTNERS

### PRIVACY POLICY

- Where the individual consents to the transfer; or
- Where Slack-Smith Partners has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information in a manner inconsistent with the APP's. We select our service providers carefully and require strict security and confidentiality arrangements. Disclosure of your information may include overseas data locations for cloud technology (for storage and maintenance), these locations are commonly located in the United States, the United Kingdom, Singapore and New Zealand but could also include other countries as required. The use of an overseas recipient does not change our commitment to safeguard your privacy and the information remains subject to existing confidentiality obligations.

**Cloud Storage** In the emerging technological environment that we operate, new technologies may be adopted or new products/services introduced within or outside of Australia. Where personal information / data is stored in Australia, the APP's automatically apply. Where personal information / data is stored outside Australia, Slack-Smith Partners will take reasonable steps (as required by the Australian Privacy Act 1988) to ensure the data will not be held, used or disclosed by the third party storage provider. In any such case we are committed to review the privacy impacts and uphold our strict privacy and security guidelines.

**Consent to use of Cloud Storage** By engaging the services of Slack-Smith Partners (as set out in our terms of engagement) you are providing your consent to allow to us to store your personal information in the cloud both at Australian and Overseas Data Centres.

**Security of personal information** Slack-Smith Partners implement a variety of measures to protect the security of your personal information against misuse, loss, unauthorised access, modification and disclosure of personal information under our control. Security and confidentiality of personal information is ensured in both the physical and electronic environment. We implement a range of security measures to protect the security of your personal information including:

- Clauses in employee agreements requiring confidentiality and training on the importance of the privacy legislation
- Appropriate security access to Slack-Smith Partners premises

# SLACK-SMITH

## PARTNERS

### PRIVACY POLICY

- Passwords management to restrict access to hardware and database information
- Shredding for disposal of written information
- Regular backups of electronic information that is stored both locally and in the cloud
- Firewalls, antivirus, malware protection to prevent security breaches within our systems

This Privacy policy applies to any personal information we collect via our website, portal or social media sites. Our website may log certain statistics about the user but this information does not specifically identify an individual. In some cases "cookies" maybe used on our website. Cookies are small files a website can transfer to your computer to store information about your preferences. If you are concerned about the use of cookies, you can configure your web browser to reject or delete cookies. We have an obligation to report data breaches to the Office of the Australian Information Commissioner (OAIC) in certain circumstances. In the unlikely event that we have to notify the OAIC we will also notify the individuals affected.

#### Retention of Personal Information

Various laws impose different requirements on the retention of information.

Depending on the context we are required to retain your information for periods of between 5 years and permanently. Where your information is no longer used, needed or required to be retained, Slack-Smith Partners will take all reasonable steps to destroy or permanently de-identify personal information.

#### Access, Contact Details and Corrections

You can request at any time to give you access to the personal information we hold about you (except in limited circumstances in which it is permitted for us to withhold this information, for example where granting access would infringe another person's privacy). If you make a request to access personal information we may require that you provide some form of identification such as a driver's licence or passport so that we can verify that you are the person to whom the information relates. All reasonable steps are taken to ensure the personal information we hold is accurate, complete and up to date. If you believe that the information we hold about you is incorrect or out of date, or if you have concerns about how we are handling your personal information, please contact our Privacy Officer and we will try to resolve your concerns. If you wish to have your personal information deleted, please 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).

# SLACK-SMITH

## PARTNERS

### PRIVACY POLICY

If you have any further queries relating to our Privacy Policy, or you have a problem or complaint, please contact our Privacy Officer. If you are not satisfied with our handling of your problem or complaint you may contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or by phone 1300 363 992.

#### Contact Details:

Privacy Officer Slack-Smith Partners

PO Box 35, Tamworth NSW 2340

P: 02 6761 3461

E: [tamworth@slacksmithpartners.com.au](mailto:tamworth@slacksmithpartners.com.au)

**Changes to this Privacy Policy** We reserve the right to review and amend this Privacy Policy from time to time and to notify you by posting an updated version on our website at [www.slacksmithpartners.com.au](http://www.slacksmithpartners.com.au)