

- April 2022 -



Privacy Policy

A comprehensive policy covering how we store, use and manage your private information.

We understand and appreciate privacy concerns, particularly in relation to the use and disclosure of your Personal Information. We are committed to providing a high level of privacy in relation to all Personal Information that we collect. As accountants, we have certain obligations to clients to maintain the confidentiality of information disclosed to us. This Privacy Policy is intended to complement those obligations and not to limit them in any way.

PRIVACY POLICY

This Privacy Policy (Policy) sets out the policy of Ashfords Accounting and Advisory Pty Ltd and its related entities (referred to throughout this policy as “Ashfords”, “we”, “us”, and “our”) with respect to the way we collect, use, and disclose information about you, including through our website, www.ashfords.com.au. We adopt and are bound by the Australian Privacy Principles contained within the Privacy Act 1988 (Cth).

SCOPE OF THIS POLICY

This Privacy Policy covers Personal Information that we collect, use, and/or disclose in relation to any of the following:

- our clients or prospective clients
- users of our website
- other parties that we come into contact with in the course of acting for our clients
- our employees and applicants for employment
- our suppliers or prospective suppliers
- any agent acting on our behalf
- independent contractors or any person who applies to become an independent contractor engaged by Ashfords.

This Policy does not apply to other companies or organisations or websites to which our website is linked.

PERSONAL & SENSITIVE INFORMATION

For the purposes of this Privacy Policy, ‘Personal Information’ is information or an opinion about you (which reasonably identifies you), whether or not the information or opinion is true or recorded in a material form.

For the purposes of this Policy, ‘Sensitive Information’ is personal information about a person’s race or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliation, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information, or biometric information or templates.

We aim to collect Personal Information only if it is reasonably necessary for us to provide services or products, perform an obligation, or provide requested information. The type of Personal Information that we collect may differ depending on whether you are (or would like to become) a user of our websites or social media sites, customer, supplier, agent, employee, or independent contractor of Ashfords.

Generally, the Personal Information that we collect will include your name, address, telephone/mobile number, facsimile number, email address and credit card details. If relevant, we may ask for your date of birth. We may also require details of your company’s ABN and/or ACN, financial information (including information relating to your solvency or creditworthiness) or details of your employer and occupation.

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If you access our website or social media profiles, we may collect additional Personal Information in the form of your IP address and domain name.

In some circumstances you may deal with us anonymously or using a pseudonym, however, in most circumstances, if you do not provide us with the Personal Information that we require, or if you provide it in a way that does not identify you, we are unlikely to be able to provide the services, products, information or assistance that you have requested.

HOW WE COLLECT YOUR PERSONAL INFORMATION

We collect your personal information in a number of ways, including the following:

- when you provide us with Personal Information, including by telephone, email, business cards, application forms, customer satisfaction surveys, contracts, or any other document or information provided by you to us by any means
- when you enquire about our services (including via email or other online enquiry)
- when you access our website or our social media profile
- from third parties and from credit reporting agencies
- from our clients
- from publicly available sources of information
- through analysis of social media conducted by us or by third parties on our behalf
- via any other collection of or incidental to, or directly or indirectly related to the services and products we may provide to you
- from our own records.

When you visit our website, we may make a record of your visit. The following information (which does not identify you) may be logged for statistical purposes and for the purposes of marketing and advertising to you:

- your internet protocol (IP) address
- the date and time of your visit
- the pages that you have accessed and the documents downloaded
- the type of browser you were using

Tracking technologies such as cookies may be used on our website to:

- recognise a user's browser each time that user visits our site
- track which pages the user visits whilst on our site
- send advertisements to your IP address that are relevant to the pages you have visited.

Cookies are pieces of information that a website transfers to a computer's hard drive for record keeping purposes. Most web browsers are set to accept tracking technologies such as cookies. These tracking technologies do not personally identify the user. If you do not wish to receive any cookies you may set your browser to refuse them, however, your use of our website may be affected.

PRIVACY POLICY

HOW WE USE YOUR PERSONAL INFORMATION

Generally, we use your personal information for the following purposes:

- to supply our services (including financial and lending advice) and products to you
- to provide you with effective customer service
- to promote and market Ashfords' business, services and products
- to process payments
- hours of employment, salary or wages of an employee
- for security, credit or fraud prevention purposes
- to process any application you have made (including an application for employment)
- to invite you to participate in surveys and provide us with feedback
- to manage and monitor the performance of our business and employees, suppliers, agents and contractors
- to enforce any terms of engagement including payment terms
- for any other purpose identified in an applicable privacy notice, click-through agreement or other agreement with you
- to perform our role as an employer in accordance with applicable laws.

We may collect, hold, use, and disclose your Personal Information for any reason which is related to any of the above purposes (Secondary Purpose), provided that you have agreed, or that you would reasonably expect, that we may use your Personal Information for that Secondary Purpose.

In the case of Sensitive Information, the Secondary Purpose must be directly related to the primary purpose for which we collected such information.

By accepting this Privacy Policy, you agree that the following are (without limitation) Secondary Purposes for which we may collect, hold, use and disclose your Personal Information to:

- better understand your needs and interests
- improve our services and products
- improve our marketing and promotion efforts
- enforce any legal right that is available to us
- perform any legal obligation that we are required to undertake
- publish testimonials on our website if a testimonial has been provided by you
- prevent, detect, investigate or remedy any improper conduct
- obtain legal advice
- prepare for and/or participate in any legal proceeding (or potential legal proceeding).

DIRECT MARKETING

Your Personal Information may be added to our database. From time to time, your details may be used by us to promote our services, including to advise you about upcoming seminars and other events, and to keep you informed about relevant issues.

On each communication, we will advise how you may unsubscribe or opt out of receiving such communications. You may, at any time, request not to receive direct marketing communications from us and we will comply with that request. There is no fee for such deletion from the mailing list.

PRIVACY POLICY

DISCLOSING PERSONAL INFORMATION TO THIRD PARTIES

In the conduct and operation of our business, it is necessary for Ashfords to use the services of numerous third parties. By accepting this Privacy Policy, you consent to our disclosure of your Personal Information to third parties for the following purposes:

- for any purpose of or incidental to providing our services and products to you
- to allow any third party to perform functions that we outsource to them, including in respect of database management, computer systems or internet sites
- to allow any third-party vendor to act on our behalf. E.g. vendors to conduct surveys or to assist with promotional or marketing efforts
- to allow third party sites and service providers to perform their functions, including payment processing, business analysis and marketing platforms
- to credit reporting agencies or other relevant government authorities in the event of any default in payment
- for any purpose of or incidental to the sale of any part of our business, including disclosure of Personal Information to prospective purchasers and their legal and accounting representatives
- to advertise our services and products. E.g. via media when photographs or videos are used in advertising material or campaigns
- to any third party (including superannuation funds) as is required to enable us to carry out our function as an employer
- for any other purpose or reason that is required by law.

Ashfords will not disclose your Personal Information to any third party without your prior consent (either express or implied), where such consent is required by law.

CROSS-BORDER DISCLOSURE

Some products, programs, software, online tools or social media used by Ashfords (and its third-party providers) are based overseas.

The use and disclosure of your Personal Information by any such overseas organisations will be in accordance with their own terms and conditions and privacy policies.

Currently we use the below overseas-based products and providers (subject to change):

Product/ Website	Country	Privacy Policy
AGN International	UK	agn.org/privacy-policy/

If you consent to disclosure of your Personal Information as described above, Ashfords is not required to take steps to ensure that these organisations comply the Australia Privacy Principles in relation to any Personal Information that is disclosed.

Having been informed of the possibility that cross-border disclosure may occur, when accepting this Privacy Policy, you also consent to such disclosure being made to the above-listed parties.

For the avoidance of any doubt, your consent to this disclosure will be provided when you undertake any activity that indicates your consent, as specified in 'Acceptance of this Privacy Policy,' on page 8.

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HOW ASHFORDS PROTECTS YOUR PERSONAL INFORMATION

We are committed to ensuring the security of your Personal Information and we will take all reasonable steps to protect this Information from misuse, interference, loss, unauthorised access, modification or disclosure, including:

- having robust physical security of our premises and databases/records
- taking measures to restrict access to personnel who need Personal Information in order for Ashfords to provide its products and services
- technological measures, such as passwords, data back-up, anti-virus and anti-malware software and firewalls
- 24x7 cyber-security monitoring and surveillance or networks and server infrastructure via an industry leading Security Operations centre service.

Please note that our website does not provide systems for secure transmission of Personal Information across the internet, except where otherwise indicated. When emailing or providing Personal Information to us via our website, please be aware that there are risks involved in transmitting Personal Information via the internet.

Our correspondence, website or social media profiles may contain links to other websites. We have no control over the privacy practices employed at other websites and we accept no responsibility for Personal Information that is provided via unsecured websites.

We cannot provide a guarantee with respect to the security of your Personal Information

and we will not be liable for any breach of security or unintended loss or disclosure due to our website being linked to the internet.

HOW TO ACCESS, UPDATE OR CORRECT YOUR PERSONAL INFORMATION

To access, update, or correct the Personal Information that we hold about you, please contact our Privacy Officer. We will respond to you within a reasonable time.

We may ask you for additional information to verify your identity. In most cases, we will provide access and correct or delete any inaccurate information that you discover.

In some cases, however, we may limit or deny your request if the law permits or requires us to do so or if we are unable to verify your identity.

COMPLAINTS

If you believe that we have not complied with our obligations under the Australian Privacy Principles or a credit reporting code that binds us, or if you have a complaint about our use or disclosure of your Personal Information, please contact our Privacy Officer.

Our Privacy Officer is responsible for liaising with you to ensure that the issues you have raised are fully examined and that your complaint is handled in accordance with this process. We will treat the process, and all the details of your complaint, in strict confidence. If we need to discuss any issues arising from your complaint with a third party, we will obtain your consent first.

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We may need to discuss the complaint with another credit provider or credit reporting body if we consider it necessary in order to deal with the complaint.

We will endeavour to resolve your complaint as soon as possible, but the length of time will depend on the nature and complexity of the issues you have raised.

You will receive acknowledgement of receipt of the complaint from us within five business days. We will give you an estimate of how long it may take us to deal with the matter, but we will endeavour to finalise the matter within 60 days.

After assessing your complaint, we will decide what action (if any) we should take in response.

Some of the things that we may decide to do include:

- taking steps to rectify the problem or issue you have raised
- providing you with additional information or advice so you can understand what happened and how we have dealt with it
- taking steps to change our policies or procedures if your complaint identifies a problem in the way we are doing things.

If we have not resolved a complaint to your satisfaction, you may wish to escalate the matter to the Privacy Commissioner via an online privacy complaint form which can be found at:

www.oaic.gov.au/privacy/making-a-privacy-complaint

PERSONAL INFORMATION – EMPLOYEES

From our employees (and applicants for employment) we collect several types of Personal Information, including but not limited to, commencement dates, employment status, location, gender, bank account details, emergency contact details, qualifications, previous employment details, driver's licence number, car registration number, medical and health information, passports, leave summaries, wages and salary information, date of birth, superannuation information, tax file numbers, visa immigration information (where relevant), and information relating to performance and conduct. As an employee your photo may be used to identify you.

Personal Information does not include an "employee record." This is a record of information related to employment and includes health information and personal information associated with the:

- employment, training, or disciplining of an employee
- resignation or termination of an employee
- terms and conditions of employment of an employee
- employee's performance or conduct
- hours of employment, salary or wages
- personal and emergency contact details for an employee
- employee's membership of professional or trade associations or union membership
- employee's long service leave, sick, personal, maternity, paternity and other leave
- employee's taxation, banking and superannuation affairs.

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We treat employee records with absolute confidentiality and strict controls are placed on who has access to such information. We will not disclose your employee records to any third party other than as permitted by this Privacy Policy without your prior consent. If a request is made in writing from a third party and you consent to disclosure, we will only confirm or deny information that they have received from you.

ACCEPTANCE OF THIS PRIVACY POLICY

You accept this Privacy Policy and consent to Ashfords collecting, using, and disclosing your Personal Information in accordance with this Policy by taking any one or more of the following actions:

- engaging (or continuing to engage) Ashfords to provide services or products
- making enquiries (including via telephone, email, internet, or in person) in respect of Ashfords' services or products
- performing your role as an employee
- making enquiries or applying to become an employee, independent contractor or supplier of Ashfords
- attending Ashfords' offices
- providing us with your contact details or any other Personal Information
- visiting any website or social media site established by us, including but not limited to Facebook, Instagram and LinkedIn
- uploading or posting any material to any website or profile established by Ashfords
- participating in any activity on our social

media pages including, but not limited to, entering competitions, subscribing to any blog, posting, pinning, or uploading any material, liking and/or commenting on anything on any social media page

- otherwise providing us with Personal Information by any means.

If you do not agree to be bound by this Privacy Policy, you should not take any of the actions listed above.

NOTIFICATION OF CHANGES

You must notify us as soon as reasonably practicable of any changes to the Personal Information that you have provided to us, or if you are aware of any inaccurate, out of date, misleading or false Personal Information.

CHANGES TO PRIVACY POLICY

This Privacy Policy may be amended or updated. When this occurs, we will post the new version of the Privacy Policy on our website. We encourage you to review this Policy so that you remain informed as to how we are collecting, using, disclosing, and protecting your Personal Information.

PRIVACY OFFICER DETAILS

Privacy Officer:

Lora Brooks, People & Culture Coordinator

Telephone: 03 8513 8810

Email: lora.brooks@ashfords.com.au

Postal Address:

PO Box 4525, Dandenong South, Vic. 3164