



Compass Business Accountants Privacy Policy

Compass Business Accountants Pty Ltd as trustee for Compass Business Accountants Unit Trust and any affiliated organisations (collectively referred to in this policy as “Compass Business Accountants”) is committed to protecting the privacy of your personal information. This privacy policy explains how Compass Business Accountants manages the personal information that we collect, use and disclose and how to contact us if you have any further queries about our management of your personal information.

Compass Business Accountants is required by the Privacy Act 1988 (Cth) (“Privacy Act”) to comply with the Australian Privacy Principles (“APP”). The APPs regulate the manner in which personal information is handled throughout its life cycle, from collection to use and disclosure, storage, accessibility and disposal.

Compass Business Accountants are tax agents registered under the Tax Agent Services Act 2009 and are subject to the Taxation Administration Act 1953.

What is personal information?

Personal information is information or an opinion, in any form and whether true or not, about an individual whose identity is apparent or can reasonably be ascertained from the information or opinion. Examples include an individual’s name, address, contact number and email address.

Special provisions apply to the collection and handling of tax file numbers (“TFNs”). Compass Business Accountants are lawful tax file number recipients and are bound by the Tax File Number Guidelines 2011 (TFN Guidelines) issued under the Privacy Act.

Collection of personal information by Compass Business Accountants

To the extent required by the Privacy Act:

- Compass Business Accountants will not collect personal Information about you unless that information is necessary for one or more of our functions or activities
- Compass Business Accountants will collect personal information only by lawful and fair means and not in an unreasonably intrusive manner

When Compass Business Accountants collects personal information directly from you, we will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purposes for which we are collecting the information, the organisations (or types of organisations) to which we would normally disclose information of that kind, the fact that you are able to access the information and how to contact us (for example, where personal information is collected on a form, we will generally include a written privacy statement with the form that sets out these details).

Compass Business Accountants will collect your personal information directly from you where it is reasonable and practicable to do so. Where Compass Business Accountants collects information

about you from a third party, we will still take reasonable steps to ensure that you are made aware of the details set out above.

Use and disclosure of personal information by Compass Business Accountants

If Compass Business Accountants uses or discloses your personal information for a purpose (secondary purpose) other than the main reason for which it was originally collected (primary purpose), to the extent required by the Privacy Act, we will ensure that:

- The secondary purpose is related to the primary purpose of collection and you would reasonably expect that Compass Business Accountants would use or disclose your information in that way;
- You have consented to the use or disclosure of your personal information for the secondary purpose;
- The use or disclosure is required or authorised by or under law; or
- The use or disclosure is otherwise permitted by the Privacy Act (for example, as a necessary part of an investigation of suspected unlawful activity).

Why does Compass Business Accountants collect personal information?

Compass Business Accountants collects personal information including TFNs for the management and administration of taxation, superannuation and personal affairs of their clients. This includes individuals, partnerships, companies, self-managed superannuation funds and trusts.

From time to time Compass Business Accountants will use personal information for marketing and business development purposes including issuing monthly newsletters, sending invitations to events, notifications of group services and discounts, administering client surveys and contests. Each piece of information sent to you for these purposes will include a provision for you to opt-out of the communication. Alternatively if you do not wish to participate in any of these activities please let us know (our contact details are provided at the end of this policy).

How might we contact you?

We may contact you in a variety of ways, including by post, email, SMS, telephone call or facsimile.

Any electronic message that we send will identify Compass Business Accountants as the sender and will include our contact details. If you wish to opt-out of these messages at any time please contact our administration team.

When does Compass Business Accountants disclose personal information to third parties?

In providing our services we may need to disclose personal information to third parties, namely the Australian Taxation Office (“ATO”) and other authorised government bodies.

Personal information including TFNs collected for the purposes of administering your taxation, superannuation and personal assistance affairs will be disclosed to the ATO through the lodgement of income tax returns and supporting schedules.

In providing our services we may need to disclose personal information to other third parties besides the ATO. These include but are not limited to financial institutions, finance brokers, financial planners, auditors, legal professionals, suppliers of client offers and services, etc. This information will not be provided without obtaining your express consent to do so. Your consent will be obtained at the time of and for each individual request made.

Compass Business Accountants may offer a product or service from an external company to you that we may consider beneficial to you. In order to take up this product or service we would need to provide your personal information to the provider. Your personal information will not be provided without obtaining your express consent to do so at the time of the offer.

Data quality and security

To the extent required by the Privacy Act, Compass Business Accountants will take reasonable steps to:

- Make sure that the personal information that we collect, use and disclose is accurate, complete and up-to-date;
- Protect the personal information that we hold from misuse and loss and from unauthorised access, modification or disclosure; and
- Destroy or permanently de-identify personal information that is no longer needed for any purpose that is permitted by the Privacy Act.

Anonymity

Due to the nature of our business it is not practicable for Compass Business Accountants to provide individuals with the option of not identifying themselves by remaining anonymous or using a pseudonym when entering into transactions with us.

Use of Commonwealth government identifiers

Compass Business Accountants will not use Commonwealth government identifiers (“Identifiers”) (such as Tax File Numbers) as its own identifier of individuals. We will only use or disclose Identifiers in circumstances permitted by the Privacy Act.

Transfer of personal information overseas

If Compass Business Accountants transfers your personal information outside Australia, Compass Business Accountants will comply with the requirements of the Privacy Act that relate to trans-border data flows. We currently use a number of software packages which utilise information stored in the cloud. Our investigations have shown that our providers are Australian-based, store all information in Australia and are therefore bound by the Privacy Act.

Credit information

Compass Business Accountants is a credit provider and is committed to protecting the privacy of your credit information.

When Compass Business Accountants collects credit information directly from you, we will take reasonable steps at or before the time of collection to ensure that you are aware of certain key matters, such as the purposes for which we are collecting the information, the fact that you are able to access the information and how to contact us (for example, where credit information is collected on a form, we will generally include a written privacy statement with the form that sets out these details).

Compass Business Accountants will not provide your credit information to credit reporting bodies without your express consent.

The security of your credit information is of the highest priority to Compass Business Accountants, and we have policies and procedures in place to reflect this.

Access and correction of your personal and/or credit information

Please contact Compass Business Accountants if you would like to access or correct the personal and/or credit information that we hold about you. Compass Business Accountants will generally provide you with access to your personal and/or credit information (although a fee may be imposed), and will take reasonable steps to amend any personal and/or credit information that is incorrect. In some circumstances, Compass Business Accountants may not permit access to your personal and/or credit information, or may refuse to correct your personal and/or credit information, in which case we will provide you with reasons for this decision.

Further information

Please contact Compass Business Accountants if you have any queries about the personal and/or credit information that Compass Business Accountants holds about you or the way we handle that personal and/or credit information. Compass Business Accountants contact details for privacy queries are set out below.

Compass Business Accountants Privacy Contact

Attention: Director, Compass Business Accountants, PO Box 2781, Toowoomba Q 4350

Phone: 07 4638 7472

E-mail: info@compassba.com.au

Complaints

Please contact the Compass Business Accountants privacy contact using the above details if you have any concerns or complaints about the manner in which your personal and/or credit information has been collected or handled by Compass Business Accountants.