

# Policy | Privacy

## 1. Introduction

We respect your personal information, and this Privacy Policy explains how we handle it. We take appropriate measures to ensure SW Accountants & Advisors (SW) can engage securely with and for our customers. The policy covers SW and all its related entities. As some of our related entities may have specific legal requirements, they may have separate, but consistent policies.

## 2. What information will we collect?

SW collects and holds personal information from clients, customers, employees, contractors and other individuals necessary for business purposes. The main type of information SW generally collects and holds about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth
- Other contact details such as social media handles
- Health information where permitted
- Your location or activity including IP address
- Credit information such as details relating to credit history, credit capacity, and eligibility for credit ('credit worthiness')
- Investment details, and
- Payroll details, taxation details (including tax file number), job titles and other accounting and financial services related information.

SW collects most information directly from you when we deal with you. The personal information SW collects may be provided in forms filled out by you, face to face meetings, email messages, telephone conversations or by third parties.

### Cookies

Cookies are small files that are placed on your device by websites which collect information about your use of those websites. Different types of cookies are used for different purposes. There are cookies that are active for a single session which, for example, help to facilitate the completion of application forms or surveys. On the other hand, persistent cookies are stored on your device and help websites remember your information and settings when you visit them in the future.

SW uses cookies for various purposes including:

- Determining if your browser has previously visited the website, and
- Remembering your settings/preferences and tracking and reporting on website usage.

You can choose to change your browser's cookie settings via your browser privacy settings, including blocking the use of cookies. If you choose to delete or block cookies, your experience on may be limited.

## Third parties

We may also collect information about you that is:

- Publicly available (for example in public registers or on social media)
- From your representatives (including your financial or legal advisor, accountant, mortgage broker, executor, administrator, guardian, trustee, or attorney), and
- Insurers.

If you contact SW, a record of that contact may be kept. Where practicable, we will give you the option of interacting with us anonymously. On all occasions, your information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

## Sensitive information

The Privacy Act protects your sensitive Information – such as information about your religion, ethnicity, or health. Unless required by law, we will only collect sensitive information with your consent.

We also collect information about you when you use our services or deal with us in some way.

### 3. How do we use this information?

SW collect, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. If you choose not to provide us with personal information, SW may be unable to do such things.

SW may collect, hold and use personal information about individuals to market its services, including by email. However, individuals always have the opportunity to elect not to receive further marketing information from SW by writing to the Privacy Officer. Please allow for 28 days for your request to be processed. Alternatively, if SW contacts you by email, you may use the unsubscribe function in that email to notify SW that you do not want to receive further marketing information by email.

SW will only use your information for the purpose for which you provided it to us, related purposes and as permitted by law.

### 4. How will your information be disclosed?

Staff of SW will have access to their personal records, for use in the provision of services to them.

SW discloses your personal information for the purpose for which SW collects it. That is, generally, SW will only disclose your personal information for the purpose carrying out our business functions and activities. This may include disclosing your personal information to third parties engaged to perform administrative or other business management services. This disclosure is always on a confidential basis or otherwise in accordance with law. SW may also disclose your personal information with your consent or if disclosure is required or authorised by law.

SW may also need to disclose your personal information to one or more of the third party organisations which may include (but is not limited to):

- A client's personal financial advisor and their service provider
- Individuals or organisations that are your representatives including a client's legal advisors
- Authorised representatives of the SW who sell products or services on our behalf
- Insurance, investment, superannuation and managed funds organisations, and their advisers and service provider

- Fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature)
- Government or regulatory bodies (including the Australian Securities and Investment Commission, AUSTRAC and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities)
- Off-site third-party organisations providing storage and archiving services, and
- Other third parties (including Joint Venture partners) as required by us in performing the functions and activities of the service.

## 5. Overseas disclosure

Our business is affiliated with other businesses located overseas. In the course of doing business with you, we may disclose some of your personal information to overseas recipients. However, we will only do so where:

- It is necessary to complete the transaction you have entered into, and
- You have provided consent, or
- We believe on reasonable grounds that the overseas recipient is required to deal with your personal information complies with the Australian Privacy Principles or is bound by a substantially similar privacy scheme, or
- It is otherwise permitted by law.

At present, some of our network entities may exchange data with our overseas affiliate located in India. However, any such exchange does not change any of our commitments to safeguarding your privacy and the data remains subject to existing confidentiality obligations.

We may store your information in cloud or other types of networked or electronic systems. As electronic or networked systems can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

## 6. How is your information secured?

Our staff are trained in how to keep your information safe and secure. We use secure systems and buildings to hold your information.

We'll only keep your information for as long as we require it for our purposes. We're also required to keep some of your information for certain periods of time under law, such as the Corporations Act, the Anti-Money Laundering & Counter-Terrorism Financing Act, and the Financial Transaction Reports Act for example. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

Here are some of things we do to protect your information:

### Staff training

- Confidentiality requirements and privacy training of our employees, and
- Only giving access to personal information to a person who is verified to be able to receive that information.

### Secure handling of information

- When we send information overseas or use third parties that handle or store data, we put arrangements in place to protect your data, and
- Mandatory confidentiality guidelines for all staff and data processors within the business.

### Building security

- We use a mix of alarms, camera's and other controls in our buildings to prevent unauthorised access.

### Destroy or de-identifying data when no longer required

- We aim to keep your information as long as it's needed. When we no longer need information, we take reasonable steps to destroy or de-identify it.

### System security

- Security procedures within our offices
- IT systems designed to ensure personal information is only available to those staff who require access, and
- IT security procedures including password protection, firewalls, intrusion detection and site monitoring.

### Third parties

- Ensuring third parties and Joint Venture partners meet SW's privacy obligations.

SW will endeavour to take all reasonable steps to keep secure any information which it holds about you, whether electronically or in hard-copy, and to keep this information accurate and up to date.

## 7. Access

SW will always give you access to your personal information unless there are certain legal reasons why we can't. Where restrictions exist on our ability to provide you with access we will advise you of those reasons at the time of your request.

Should you wish to view the personal information held on you, you should contact the member of staff responsible for their file or the Privacy Officer of SW, and request a "Personal Information Access Form". We may require you to provide some form of identification (such as a driver's licence or passport) so the necessary verification can occur.

While we do not charge a client for making a request to access their personal information we may charge you a small fee to cover our costs when giving you access:

- Staff costs: if an extended amount of time is required in searching for, locating, retrieving, collating and preparing the material, and
- Costs associated with using an intermediary.

Any charges for accessing the information will be advised prior to commencement (estimated time and cost).

## 8. Accuracy & correction

If you think there is something wrong with the information we hold about you please contact your SW Representative (phone, email, mail or fax) or the Privacy Officer.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can - if we can't, then we'll let you know in writing.

If you wish to have your personal information deleted, please contact the Privacy Officer and we will take reasonable steps to delete it (unless we need to keep it for legal, auditing or internal risk management reasons).

In certain situations, we may not agree to a request to correct information we hold about you. If this occurs, we will advise you of this and our reason for not agreeing to the correction request and you have the right to complain about the refusal in the manner set out in the next section.

## 9. What do you need to do if you have a complaint?

If you want to make a complaint about our handling of personal information we ask that you contact SW first. We will then follow our Internal Dispute Resolution process and we will endeavour to respond within a reasonable period after the request is made (not exceed 30 calendar days). If the matter proves to be more complex we will advise you of a revised response timeframe in writing.

If you have any further queries relating to our Privacy Policy, or you have a problem or complaint, please contact our Privacy Officer.

Any complaint regarding a possible breach of privacy by SW should be directed to SW in writing; mail or e-mail to the Privacy Officer at the following address:

### The Privacy Officer

SW

Level 10, 530 Collins Street

Melbourne VIC 3000

E [data.notification@sw-au.com](mailto:data.notification@sw-au.com)

If your complaint is not handled satisfactorily, you may refer your complaint to the:

### The Office of the Australian Information Commissioner

T 1300 363 992

E [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

[www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)

### Australian Financial Complaints Authority

The Australian Complaints Authority (AFCA) provides fair and independent financial services complaint resolution that is free to consumers.

ACFA can be contacted at:

W [www.afca.org.au](http://www.afca.org.au)

E [info@afca.org.au](mailto:info@afca.org.au)

P 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

## 10. Privacy Policy Updates

This Privacy Policy is not a static document. SW may from time to time make changes and update this Privacy Policy. The current SW Privacy Policy will always appear on our website.

The amended policy will apply between us whether or not we have given you specific notice of any change.

This policy was last updated 1 November 2018.