

Policy:	Privacy & Confidentiality
Applies To:	Wheatcroft Enterprises Pty Ltd
Standards Context:	
Last Review	26 March 2022 (Levi Wheatcroft)
Next Review	October 2022

## Privacy Policy

### Table of Contents

Privacy Policy.....	1
Overview.....	1
Collection of Personal Information.....	1
Use of Personal Information.....	1
Marketing Communications.....	2
Disclosure of Personal Information.....	2
Transfer of Information Outside Australia.....	2
Privacy on our websites and applications.....	3
Security of Personal Information.....	3
Access to Information.....	3
Corrections, Concerns, and Complaints.....	3
Staff and Service Provider Responsibilities.....	4
Effect of Policy.....	4

### Overview

Albany Accounting’s privacy policy is designed to be a transparent, practical, common sense approach to handling the private personal information we collect and maintain in a secure and appropriate manner. If you have any questions or concerns about the content of this policy, please contact us as a priority.

### Collection of Personal Information

Albany Accounting & Consulting collects personal information about a range of entities including clients, entities associated with those clients, employees, contractors, and other individuals. We collect and hold this information in the course of carrying on our business, and in the course of undertaking engagements on behalf of our clients.

This personal information typically includes names, addresses, telephone numbers, and email addresses. We may collect and hold additional information as required, such as tax file numbers, dates of birth, and various financial information.

We collect most information directly from clients, via in person meetings, phone conversations, documentation, and email messages.

## **Use of Personal Information**

The underlying purpose for the collection of personal information is to undertake professional engagements for our clients. In practice, such information may be used for the following purposes.

- to fulfil an engagement with a client or provide a service to a client;
- to keep clients and other contacts informed as regards any information we believe may be of interest to them;
- to maintain contact with clients;
- for invoicing and collection purposes;
- for employment purposes;
- other purposes related to our business;

## **Marketing Communications**

From time to time we contact clients to keep them informed of services we offer, and changes to those services. Individuals can elect not to be included in these marketing communications by writing to Albany Accounting & Consulting, PO BOX 509 ALBANY WA 6331, or by email to [hello@albanyaccounting.com.au](mailto:hello@albanyaccounting.com.au).

## **Disclosure of Personal Information**

Albany Accounting & Consulting does not sell or trade personal information with third parties.

Albany Accounting & Consulting will not disclose personal information to a third party unless:

- such a disclosure is permitted by this policy, or
- we believe it is necessary to fulfill an engagement with our client, or
- a client provides their consent for a disclosure, or
- such a disclosure is permitted by law

From time to time Albany Accounting & Consulting engages service providers to perform various tasks who may require access to personal information in order to fulfill their duties. This may include, but is not limited to, software providers and developers, information technology providers, document and disposal service providers. These service providers are required to adhere to the Australian Privacy Principles, and not to keep, use or disclose personal information we provide to them for any unauthorised purposes.

## **Transfer of Information Outside Australia**

Albany Accounting & Consulting does not engage offshore personnel to perform accounting duties.

There are many functions performed by our office where it is not possible or practical to ensure data is stored only within Australia. As a result, we may transfer personal

information outside Australia to countries whose privacy laws do not provide the same level of protection as Australia's. In addition, Albany Accounting & Consulting may also use overseas facilities or contractors to process or back-up or to provide certain services to us. As a result, we may transfer personal information to overseas facilities or contractors for these purposes.

Service providers are only engaged where they are contractually obliged to adhere to this privacy policy and the Australian Privacy Act, or where their own privacy policy would constitute adherence to the same.

Our privacy policy does not differentiate between service partners located within, or outside of, Australia.

## **Privacy on our websites and applications**

This privacy policy applies to any information collected electronically via our website or applications.

Our websites may use cookies, and may log certain statistics about visitors. The data collected via these means can not be used to identify visitors, and is used solely to provide the best user experience possible.

## **Security of Personal Information**

Personal information may be stored electronically or in hard copy. Whether in storage or transfer, Albany Accounting & Consulting will endeavour to take all reasonable steps to keep secure any information which we hold about our clients and contacts.

Albany Accounting & Consulting staff and service providers only have access to the information necessary to perform their duties, and all staff and service providers are required to adhere to this privacy policy.

There are inherent difficulties in balancing security, convenience, and client expectations. To meet the varied requirements of clients, we offer the following service variants:

- We will never store or transfer a contact's Tax File Number via an insecure or unencrypted medium.
- We communicate via Dropbox and Google Drive on an opt-in basis.
- We communicate via email, fax, and post on an opt-out basis.

## **Access to Information**

Upon request by an individual, we may provide access to personal information, but only where we are satisfied that the requesting individual is authorised to receive such information.

We may charge a fee depending on the type, volume, and location of the information in question.

Individuals or entities may request personal information by contacting us via email, phone, or in writing.

## **Corrections, Concerns, and Complaints**

Albany Accounting & Consulting takes the responsibility of handling personal information and protecting clients privacy very seriously. If clients are concerned about our handling of their personal information, they may contact us and we will work to resolve those concerns. If a client is not satisfied with our handling of their concern they may make a complaint to the Australian Information Commissioner.

Deleting client personal information may not be possible, as in many cases we are required to keep such information for future reference. However, it may be possible to delete some elements of the personal information we keep, or it may be possible to resolve a client's concerns in other ways.

## **Staff and Service Provider Responsibilities**

Any personal information service providers (associates) are given access to in the course of their engagement with Albany Accounting & Consulting should be considered confidential. Associates must make every reasonable effort to keep such confidential information secret and confidential. Associates are prohibited from using such confidential information for any purpose other than that which the associate is engaged by Albany Accounting & Consulting to perform.

Associates are to make every reasonable effort to ensure that no part of this privacy policy is contravened during the daily execution of their duties. Should an associate become aware of any contravention, they must immediately inform their supervising officer.

Many functions of our information systems are available online via the internet. There are inherent security concerns in accessing these functions from a computer or device which is not under the direct control of Albany Accounting & Consulting. These concerns can be mitigated by observing the following protocols:

- Install and maintain adequate antivirus and firewall software.
- Use a password manager such as lastpass or keepass.
- Do not use the same password for multiple purposes.
- Use good quality passwords, generally 16 characters or more, and containing upper case, lower case, and number characters.
- Ensure that physical access to devices is adequately restricted, individuals who are not Albany Accounting & Consulting staff or do not have a service agreement with Albany Accounting & Consulting should not have physical access to these devices.
- If an associate suspects that the security of a device has been breached, they must power down the device immediately, inform their supervising officer, and await further instructions.

## **Effect of Policy**

Albany Accounting & Consulting aims to review this policy biennially in order to consider any required changes.

Albany Accounting & Consulting may update this policy at any time by publishing an updated version.

The amended policy will apply whether or not we have specifically notified our clients or associates of a particular change.

## **Acknowledgement**

I the undersigned hereby acknowledge that I have read and understood this privacy policy in its entirety and agree to observe the requirements of this policy.

Signed: \_\_\_\_\_

Name: \_\_\_\_\_

Date: \_\_\_\_\_