

Halletts Financial Services Privacy Policy

Our commitment to protecting your privacy: This privacy policy applies to the collection, storage, use and disclosure of personal information by or on behalf of **Halletts Financial Services Group Pty Ltd** (ABN 79 083 148 672) (referred to in this policy as “Halletts”, “our”, “we” or “us”). Please read it carefully.

We are committed to protecting your personal information, and ensuring its privacy, accuracy and security. We handle your personal information in a responsible manner in accordance with the Privacy Act 1988 (**Act**) and the Australian Privacy Principles (**APPs**).

By using any of our products or services, visiting our website (www.halletts.com.au) or giving us your personal information, you agree to your information being collected, stored, used and disclosed as set out in this Privacy Policy.

Personal information: ‘Personal information’ means information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether true or not, and whether or not recorded in a material form. Unless a contrary intent appears, in this Privacy Policy ‘personal information’ may also include one or both of the following, as defined in the Act: ‘credit information’ and ‘credit eligibility information’.

‘Sensitive information’ (a type of personal information), has the same meaning as in the Act. In summary, it means information or an opinion about an individual’s race or ethnic origins, political opinions and associations, religious beliefs or affiliations, philosophical beliefs, sexual preferences or practices, trade or professional associations and memberships, union membership, criminal record, health or genetic information or biometric information.

Whose personal information do we collect? We may collect your personal information from a range of sources, including from you, recruitment agencies, contractors, business partners and government agencies. For example, we may collect your personal information when you request or acquire an accounting, taxation or other financial product or service from us, provide a service or product to us, apply for employment with us or communicate with us via our website, by e-mail, telephone or in writing.

Wherever reasonable and practicable, we collect personal information from the individual to whom the information relates. If you provide personal information about someone other than yourself, you agree that you have that person’s consent to provide the information for the purpose for which you provide it to us. You also agree that you have told the person about this Privacy Policy and where to find it.

What types of personal information do we collect and hold? The personal information we collect includes:

- names, addresses, e-mail addresses, phone numbers, credit card and other payment details, occupation, financial information, business structures, tax file numbers, bank details, and other information to assist us in conducting our business, providing and marketing our accounting, taxation and other financial products and services;
- credit information, including identification information, repayment history information, the type and amount of credit, default information, court proceedings information, personal insolvency information, publicly available information about credit worthiness, opinions about serious credit infringements, and other personal information about an individual’s credit worthiness, such as credit ratings or scores;
- information about staff and directors, as required in the normal course of human resource management and the operation of a business; and
- information about current and previous Halletts suppliers and clients with whom Halletts has dealings.

We will only collect your sensitive information: if you have consented to us doing so – for example, where relevant to taxation matters such as Medicare exemptions, Medicare rebates and private health insurance, or to identify tax deductions such as relevant membership subscriptions; as part of information collected about directors and employees for company and human resource management purposes; or where required or permitted by law.

How do we collect personal information? We only collect personal information by lawful and fair means. We usually collect personal information from:

- face-to-face meetings, interviews and telephone calls;
- business cards;
- electronic communications – for example, e-mails and attachments; forms filled out by people, including as part of acquiring a product or service from us;
- third parties – for example, from recruitment agencies, and your representatives or agents; and
- our website, including if you use it to contact us.

Why do we collect personal information? We collect the personal information: necessary for us to provide you with the accounting, taxation and other financial products and services you have requested from us; for marketing purposes and to provide you with information about accounting, taxation and other financial products and services that may be of interest to you; to improve the products and services we provide; and to enable us to conduct our business, including managing any credit we have provided to you and meeting our legal and regulatory obligations. If you do not provide your personal information, we may not be able to supply the requested product or service, employ you or otherwise deal with you.

How we deal with unsolicited personal information? If we receive personal information about you that we have not requested, and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

Do you have to disclose your identity when dealing with us? Where lawful and practicable, we will give you the option of interacting with us anonymously or using a pseudonym.

Use of personal information: We only use your personal information for the purpose for which it was provided to us, for related purposes (for personal information excluding credit eligibility information), or as required or permitted by law. Such purposes include:

- in the ordinary course of conducting our business. For example, supplying or acquiring products and services, responding to your enquiries and feedback, and providing information about our events, news, publications and products and services that may be of interest to you;
- market research and product and service development, so that we are able to better understand our customers' needs and tailor our future products and services accordingly;
- performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, credit and risk management, training, quality assurance and managing suppliers;
- employment-related purposes, such as recruiting and providing services to staff;
- as part of a sale (or proposed sale) of all or part of our business; and
- other purposes related to or in connection with our business, including meeting our legal and contractual obligations to third parties and for internal corporate governance purposes.

Disclosure of personal information: We may disclose, and you consent to us disclosing, your personal information to third parties:

- engaged by us to provide products or services, or to undertake functions or activities, on our behalf. For example, processing payment information, debt recovery, managing databases, marketing, research and advertising;
- that are authorised by you to receive information we hold, including where the third party is considering whether to become a guarantor for you;
- that are our business partners, joint venturers, partners or agents;

- as part of a sale (or proposed sale) of all or part of our business. For example, we may disclose information to our external advisers, to potential and actual bidders and to their external advisers;
- such as our external advisers, and government agencies. For example, where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct; or
- as required or permitted by law.

We may disclose, and you consent to us disclosing, your personal information to any of our related bodies corporate whether located in Australia or overseas. If we disclose your personal information to a related body corporate, your information will be collected, stored, used and disclosed in accordance with this Privacy Policy, the APPs and the Act.

Marketing use and disclosure: We may use and disclose your personal information (other than sensitive information) to provide you with information about our accounting, taxation or other financial products and services that we consider may be of interest to you; to keep you informed of relevant changes to tax laws; or to notify you of an upcoming tax deadline. You may opt out at any time if you do not, or no longer, wish to receive marketing and promotional material. You may do this by: contacting us via e-mail or in writing at the address below and requesting that we no longer send you marketing or promotional material; or where applicable, clicking the “Unsubscribe” button.

Use or disclosure of sensitive information: We will only use or disclose your sensitive information for the purpose for which it was initially collected or for a directly related purpose, as required or permitted by law, or where you consent to the use or disclosure.

Disclosure of personal information overseas: We may disclose personal information to third parties outside Australia via the use of electronic data storage which may be located in Australia or overseas.

How is my personal information kept secure? We take reasonable steps to protect your personal information from misuse, interference, loss and unauthorised access, modification and disclosure. Such steps include: physical security over paper-based and electronic data storage and premises; computer and network security measures, including use of firewalls, password access and secure servers; restricting access to your personal information to employees and those acting on our behalf who are authorised and on a ‘need to know’ basis; retaining your personal information for no longer than it is reasonably required, unless we are required by law to retain it for longer; and entering into confidentiality agreements with staff and third parties.

Where we no longer require your personal information, including where we are no longer required by law to keep records relating to you, we will ensure that it is de-identified or destroyed

Data quality: We take reasonable steps to ensure that your personal information is accurate, complete and up-to-date. However, we rely on you to advise us of any changes or corrections to the information we hold about you. If you consider that the information we hold about you is not accurate, complete or up-to-date, or if your information has changed, please let us know as soon as possible.

Access: You may request access to the personal information we hold about you by contacting us. We will respond to your request within a reasonable time. We will provide you with access to the information we hold about you unless otherwise permitted or required by law. If we deny you access to the information, we will notify you of the basis for the denial unless an exception applies. Where reasonable and practicable, we will provide access to the information we hold about you in the manner you request. No fee applies for requesting access to information we hold about you. However, we reserve the right to charge a reasonable fee where we do provide access.

Correction: If you believe that personal information we hold about you is incorrect, incomplete or not current, you may request that we update or correct your information by contacting us. We will deal with your request within a reasonable time. If we do not agree with the corrections you have requested (for example, because we consider that the information is already accurate, up-to-date, complete, relevant and not misleading), we are not required to make the corrections. However, where we refuse to do so, we will give you a written notice setting out the reasons.

Identifiers: We do not adopt, use or disclose government related identifiers except as required or permitted by law.

Complaints: If you have a complaint in relation to the collection, storage, use or disclosure of your personal information, please contact our Privacy Officer using the details below. You will need to provide us with details of your complaint, as well as any supporting evidence and information. We will review all complaints received and our Privacy Officer will respond to you. If you are not satisfied with our response, you may discuss your concerns with or complain to the Australian Privacy Commissioner via www.oaic.gov.au.

Changes to this Privacy Policy: We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Policy periodically for changes. Any revised policy will be placed on our website at www.halletts.com.au. Your continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

How to contact us: If you have any questions about this Privacy Policy, please contact Halletts' Privacy Officer:

- (a) by email to info@halletts.com.au
- (b) by writing to: Privacy Officer, Halletts, GPO Box 250, Canberra ACT 2601
- (c) by telephone: (02) 6257 5712
- (d) by fax: (02) 6257 5958

Effective date: 29 June 2018