



ACCOUNTANTS & WEALTH ADVISERS

Privacy Policy and Disclosure Statement

Our Commitment

Within the Perks Group we recognise that your privacy is important to you - it is to us as well.

The Perks Group comprises the following companies:

- Perks & Associates Pty Ltd
- Perks Audit Pty Ltd
- Perks Wealth Management Pty Ltd (Australian Financial Services Licence No. 236551)
- Perks Consulting Pty Ltd
- Perks Finance Pty Ltd (Australian Credit Licence No. 378241)
- Perks Business Adventures Pty Ltd

Any mention of "Perks" in this Policy includes all the above companies.

Perks abides by the Australian Privacy Principles and credit reporting provisions under the *Privacy Act 1988* (Cth). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at www.oaic.gov.au.

By voluntarily supplying us with your personal information, you are agreeing to be bound by this Policy.

This Policy is periodically reviewed. Any amendments to this Policy will be notified to you by posting an updated version on our website. This Policy was last updated on 10 March 2016.

Collection

As Perks offers chartered accounting, audit, financial planning, business consulting and finance services, we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information that personally identifies you, and/or contains information or an opinion about you ("personal information") and credit related personal information ("credit information") ("collectively referred to in this Policy as "personal information"). In addition, our ability to provide you with a comprehensive accounting, financial planning, finance and business advice service is dependent on us obtaining certain personal information about you.

The personal information that we may collect and retain about you includes:

1. contact details, including your name, address, telephone numbers, email address;
2. your tax file number;
3. details of your financial needs and objectives;

4. details of your current financial circumstances (personal and/or business), including your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
5. details of your investment preferences and aversion or tolerance to risk;
6. information about your employment history, employment circumstances, family commitments and social security eligibility; and
7. any other relevant information that you give to us for the purpose of providing you with business and/or financial recommendation.

The credit information that we may collect and retain about you includes:

1. identification information- name, date of birth, current or previous address, driver's licence number;
2. type and amount of credit sought;
3. trade references – name of entity, ABN, contact name, telephone number, fax number, email, years trading with you;
4. default information;
5. repayment history information; and
6. payment information in relation to an overdue payment.

We are required pursuant to the Corporations Act 2001, the Code of Professional Conduct of the Institute of Chartered Accountants in Australia, Rules of Professional Conduct of the Financial Planning Association of Australia and the National Consumer Credit Protection Act 2009, to collect sufficient information to ensure appropriate advice can be given in respect of recommendations made to our clients. If you elect not to provide us with the information referred to above, the appropriateness or adequacy of advice given to you may expose you to higher risks in respect of the recommendations made.

In order to provide you with advice in relation to certain types of insurance products, we may be required to collect sensitive information from you such as your health and medical history. Any health information provided to Perks by you will be handled in accordance with this Policy.

Means of Collection

Generally, collection of your personal information will be directly from you and effected in either face-to-face interviews, over the telephone or by way of an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.

We may be required to gather personal information about you from a third party/source, i.e. Banks/Financial Institutions, Insurance Companies, Fund Managers, publicly maintained records or other credit providers etc. This Policy will apply to personal information we collect from a third party.

Use and Disclosure

We collect, hold and disclose your personal information for the following purposes:

- as a necessary part of providing our services (detailed in the "Collection" section of this Policy) to you;
- to promote and market our services to you or provide you with information that we believe may be of interest to you, including to provide advertising material (unless as directed otherwise);
- to respond to an individual's request;

- to personalise and customise your experiences with our website;
- to help us research the needs of our clients and to market our services with a better understanding of your needs and the needs of clients generally;
- to provide you with online access to the information we hold about you; and
- other purposes related to any of the above.

We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide to you the services you have requested, or for any purpose set out above or otherwise notified to you.

In addition, Perks' philosophy is based upon providing an integrated business services approach. Consequently, your personal information may be shared with any one of Perks' associated entities, for the purposes set out above or any related purpose.

We are required, under the Code of Professional Conduct of the Chartered Accountants Australia and New Zealand, the Rules of Professional Conduct of the Financial Planning Association of the Code of Practice of the Australia and Mortgage and Finance Association of Australia ("Associations"), to make certain information available for inspection by the Associations on request to ensure ongoing compliance with mandatory professional standards. This may involve the disclosure of your personal information.

We may need to disclose your personal information to superannuation fund trustees, insurance providers, product issuers, banks/financial institutions, legal advisers etc. for the purpose of giving effect to your financial advice and the recommendations made by us. These entities may be based in another country, such as Vietnam and the Philippines.

Your personal information may also be disclosed to external contractors for the purposes of providing, managing or administering our services, such as:

- financial advisers;
- temporary staff that may be hired to handle workloads during peak periods;
- compliance contractors; and
- website host, cloud storage or software application providers.

Some of the external contractors to which we disclose personal information are located overseas in countries such as the Philippines, Vietnam, United States, Singapore, Hong Kong and Korea.

Storage and Security

We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential.

Your personal information is generally held in hardcopy in your client file and electronically in our computer database.

Perks' security measures include:

- all computer based information is protected through the use of access passwords on each computer;
- data is backed up daily and stored offsite;
- firewalls to prevent the hacking of our database;
- clauses in employment contracts requiring confidentiality;
- appropriate security access to Perks' premises; and
- security bins for the disposal of written information.

In the event you cease to be a client of Perks, any personal information which we hold about you will be maintained in a secure offsite storage facility for a period of seven years in order to comply with legislative and professional requirements, following which time the information will be destroyed. Perks will ensure that any documents that are destroyed are done so in a secure manner by secure shredding or other form of destruction.

Access and Correction

We will assume that the personal information that you provide to us is accurate, complete and up to date. In the event that any of your personal information changes, please contact us as soon as possible and we will amend our records.

You may at any time contact us to request access to your personal information. We will (subject to the following exceptions) provide you with access to that information by providing you with copies of the information requested, allowing you to inspect the information requested, or providing you with an accurate summary of the information held. We will, prior to providing access in accordance with this Policy, require you to provide evidence of your identity.

We are not required to provide you with access to your personal information in some circumstances, including where:

1. providing access would pose a serious threat to life safety or health of a person;
2. providing access would have an unreasonable impact on the privacy of others;
3. the request for access is frivolous or vexatious; or
4. providing access would be unlawful.

In the event we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

We will endeavour to ensure that, at all times, the personal information about you that we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, please inform us. You need to provide evidence of the proposed corrections and we will take all reasonable steps to update the information if we agree that the information requires correction.

We will endeavour to respond to any request for access or correction within 14 - 30 days depending on the complexity of the information and/or the request. If your request is urgent, please indicate this clearly.

You will not be charged a fee for making a request to access your personal information. However, if at the time of making the request you are no longer a client of Perks, and Perks incurs any costs in providing you access to your personal information (such as fees to retrieve information from off-site storage) we may pass those costs on to you at our discretion. If

charges are applicable in providing access for you, we will disclose these charges to you prior to providing you with the information, so that you have the discretion of proceeding or not.

Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Complaints Resolution

If you wish to complain about any breach or potential breach of this Privacy Policy or the Australian Privacy Principles, you should contact us via the details contained in the "Contact Us" section of this Policy and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to.

It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Australian Information Commissioner who may investigate your complaint further.

Our Website

The Perks website (www.perks.com.au) contains links to other Websites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles.

While it is not necessary to register your personal details to use our Website, we do offer a registration service that will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address.

If you have registered with us and decide that you do not wish to receive any further information from us, or you wish to amend or update your registration details, you can send an e-mail to the address noted below with your request. Please allow two weeks for your request to be actioned.

Our Website uses cookies which allows us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences.

A copy of this Policy is available on the Perks website. Alternatively, hard copies are available at our Parkside office or by contacting the Privacy Officer listed below.

Contact Us

If you seek any further information from us about this Policy generally or wish to make a complaint, please contact our Privacy Officer at one of the reference points below:

General Manager

Address: 180 Greenhill Road
Parkside SA 5063

Telephone: (08) 8273 9300
Facsimile: (08) 8274 1466
E-mail: info@perks.com.au

You may opt-out of receiving direct marketing material from us by contacting us using any of the methods detailed above and we will give effect to that request. Please allow two weeks for your request to be actioned. We maintain a register for those individuals not wanting to receive direct marketing material.