



Privacy Policy and Disclosure Statement

Our Commitment

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

The Perks Group comprises the following companies:

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

Any reference to "Perks" in this Policy includes the entities listed above. Perks handles personal information in accordance with the Australian Privacy Principles and the Privacy Act 1988 (Cth). This policy explains how we collect, use, disclose, and manage personal information.

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at [oaic.gov.au](https://www.oaic.gov.au).

At a Glance

We collect personal information to provide accounting, financial planning, audit, and consulting services.

We use and disclose personal information in order to:

- Deliver our services
- Meet legal and regulatory obligations
- Communicate with our clients
- Engage service providers and professional advisers

Where relevant to the services we provide, or where required or authorised by law, we may disclose information to third parties, service providers, and/or professional advisers and regulators. This may include associated Perks entities.

Collection of Personal Information

We may collect personal information including:

- Contact details such as name, address, phone number and email
- Financial information including assets, liabilities, income and expenses
- Employment and personal circumstances
- Investment preference and objectives
- Tax file number and identification information
- Credit related information
- Sensitive information such as health information where required

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

- Identification information, including name, date of birth, current or previous address and driver's license number
- Type and amount of credit sought
- Trade references – name of entity, ABN, contact name, telephone number, fax number, email, years trading with you
- Default information
- Repayment history information; and
- Payment information in relation to an overdue payment.

How We Collect Information

We generally collect personal information from you by:

- Meetings and interviews
- Telephone or email communications
- Online forms and systems

We may also collect information from third parties such as:

- Financial institutions
- Fund managers
- Insurers
- Professional advisers
- Publicly available sources

Notification at Collection

At or before the time of collection, or as soon as practicable afterwards, we take reasonable steps to notify you of:

- The purpose of collection
- How your information will be used and disclosed
- Any overseas disclosures
- How you can access or correct your information
- How to lodge a complaint

If you do not provide the information requested, we may be unable to provide services or provide appropriate advice.

We are required pursuant to the applicable laws, regulatory requirements and professional standards, including the Corporations Act 2001, the Tax Agent Services Act 2009 and associated Code of Professional Conduct, the professional standards and Code of Ethics of Chartered Accountants Australia and New Zealand (CAANZ), the Financial Advice Association Australia (FAAA), the National Consumer Credit Protection Act 2009 and other applicable legal and professional obligations, to collect sufficient information to provide appropriate services and advice 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.

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.

Where we are required to comply with anti-money laundering and counter terrorism financial laws, we may collect personal information directly from you, from a person acting on your behalf, from publicly available sources, from referees, financial institutions, professional advisers, identity verification providers, and from other reliable and independent sources where permitted or required by law.

Use and Disclosure

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

- Providing our services
- Responding to requests and enquiries
- Managing client relationships
- Complying with legal and regulatory obligations
- Improving our services

Personal information may be disclosed to:

- Perks associated entities, where relevant to the services being provided to you
- Financial institutions, product issuers, investment platforms, trustees, custodians and insurers
- Professional advisers and consultants
- Service providers and contractors
- Regulators, government agencies and professional bodies
- Other parties where required or authorised by law

As part of providing integrated services, your personal information may be shared within the Perks group where relevant to the services being provided to you. Access to personal information is intended to be limited to personnel involved in delivering, supporting, or administering relevant services and business operations.

We only use personal information for the purpose for which it was collected, unless:

- You have consented otherwise, or
- The use is required or authorised by law

Depending on the services provided and the professional or regulatory obligations that apply, we may be required to make certain personal information available to relevant regulators, government agencies, professional bodies, external quality reviewers or other authorised persons for inspection, quality review, investigation or compliance purposes. This may include requirements arising under the Tax Practitioners Board (TPB), Chartered Accountants Australia and New Zealand (CAANZ), the Financial Advice Association Australia (FAAA), the Mortgage & Finance Association of Australia (MFAA) and other applicable legal, regulatory or professional requirements.

We may need to disclose your personal information to superannuation fund trustees, insurance providers, product issuers, banks/financial institutions, legal advisers, service providers etc. for the purpose of giving effect to your financial advice and the recommendations made by us.

Use of Artificial Intelligence (AI)

We may use approved AI-enabled tools to assist in the delivery of our services, including preparing, analysing, summarising, or processing information.

Where AI tools are used, personal information and, in some cases, sensitive information may be processed within these tools. We only use AI tools that have been approved through Perks' governance and risk assessment processes, and which operate within secure environments with appropriate confidentiality, security and data protection controls.

Personal information is not entered into personal or consumer AI accounts.

Any output generated with the assistance of AI is subject to human review before it is relied on or provided to you. We do not make decisions about clients, advice, services, or recommendations solely by automated means.

Some AI tools may store or process information outside Australia. This may include storage, processing, support, maintenance, backup, or access by authorised personnel located outside of Australia. Where this occurs, this is addressed in the Overseas Disclosures section of this Policy.

Perks maintains policies, standards and governance processes relating to the acceptable use of AI and emerging technologies.

Overseas Disclosures

Some service providers and systems used by Perks may be located outside Australia or may allow access to personal information from overseas.

Based on the systems and service providers currently used by Perks, personal information may be stored in, or accessed from, countries including Canada, Hong Kong, New Zealand, the Philippines, Singapore, South Korea, the United Kingdom, the United States of America and Vietnam.

Where personal information is disclosed overseas, we take reasonable steps to ensure that recipients handle the information in a manner consistent with Australian privacy principles. These steps may include contractual obligations, approved systems, access controls, security safeguards and limiting access to authorised personnel.

We may also use and disclose your personal information for the purposes described in the Anti-Money Laundering and Counter Terrorism Financing section of this Policy, where required or authorised by law.

Recording of Client Meetings

Perks may record client meetings where there is a legitimate business purpose, including:

- Maintaining accurate records
- Supporting service delivery
- Preparing file notes
- Evidencing communications
- Assisting with follow-up actions

We will obtain your consent prior to recording any meeting. Recording will not proceed if consent is not provided.

Approved tools may be used to record, transcribe or summarise meetings. Where AI-enabled functionality is used, this is handled in accordance with the Use of Artificial Intelligence section of this Policy.

Recordings, transcripts and summaries may contain personal information and, in some cases, sensitive information. They will only be created using approved systems, stored securely within approved environments, and are not stored on personal devices or external media.

Recordings, transcripts and summaries are intended to be retained for a limited period to support service delivery, file note preparation and record keeping purposes. Recordings will be deleted when no longer required, unless a longer retention period is required by law or reasonably necessary for complaint handling, dispute resolution, legal, compliance or operational purposes.

Anti-Money Laundering and Counter Terrorism Financing (AML/CTF)

Where Perks provides services that are subject to applicable AML and counter terrorism financing laws, we may collect, use and disclose personal information to comply with those obligations.

This may include:

- Verifying identity and authority to act
- Identifying beneficial ownership
- Conducting risk assessments and ongoing monitoring
- Meeting reporting and record keeping obligations

Information may be disclosed to regulators, including AUSTRAC, and to other entities as required by law.

We take reasonable steps to ensure that information collected for these purposes is limited to what is reasonably necessary and is retained in accordance with applicable legal and regulatory requirements.

Storage and Security

We take reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, modification, or disclosure. Personal information is treated as confidential, and sensitive information is handled with additional care.

Personal information may be held in secure cloud-based systems, software platforms, document management systems, and physical records. Perks' security measures include:

- Controlled system access
- Access limited to authorised personnel
- Secure cloud-based systems
- Data backup and monitoring
- Staff confidentiality obligations
- Physical security controls
- Secure disposal of hard copy records

We retain personal information for as long as reasonably necessary for the purposes for which it was collected, including providing services, maintaining business records, complying with legal and professional obligations, resolving disputes and managing risk.

Retention periods may vary depending on the nature of the information, the services provided and applicable legal, regulatory or professional requirements. When personal information is no longer required, we will take reasonable steps to destroy or de-identify it securely, unless we are required or authorised to retain it.

Where we collect personal information for AML/CTF purposes, we will take reasonable steps to protect that information from misuse, loss, unauthorised access, modification and disclosure, and to ensure it is retained for customer due diligence, identity verification, risk assessment, ongoing monitoring and related compliance activities in accordance with applicable legal and regulatory requirements.

Where identity documents are used for verification purposes, we will record the relevant identifying details, the verification steps taken and the outcome of the verification process, rather than retaining a full copy of the identity document itself, unless we are otherwise required or authorised to do so by law.

Data Breaches

If a data breach occurs, we will take reasonable steps to assess, contain and respond to the incident.

Where a data breach is likely to result in serious harm, we will respond in accordance with applicable privacy laws, including the Notifiable Data Breaches scheme, where required. This may include notifying affected individuals and the Office of Australian Information Commissioner.

Access and Correction

We will assume that the personal information that you provide to us is accurate, complete and up to date. If 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:

- Providing access would pose a serious threat to life safety or health of a person
- Providing access would have an unreasonable impact on the privacy of others
- The requests for access are frivolous or vexatious; or
- 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. If 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 a reasonable timeframe, typically within 30 days. If your request is complex, we may need additional time and will let you know where this is the case. 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 with 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 prior to providing you with the information, so you can decide whether to proceed 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.

Direct Marketing

Where permitted by law, we may use your personal information to provide information about our services, service updates, newsletters, events, insights and related communications that may be relevant to you.

You may opt out of receiving direct marketing communications at any time by contacting us or using the unsubscribe mechanism provided. We will action opt-out requests promptly and, for electronic marketing communications, within 5 business days.

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.

We will acknowledge your complaint within 5 business days and aim to investigate and respond as soon as reasonably practicable. Where additional time is required, we will keep you informed of progress.

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 (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.

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 Adelaide office or by contacting the Privacy Officer listed below.

Contact Us

If you seek any further information from us about this Policy, wish to access or correct your personal information, opt out of direct marketing, or make a complaint, please contact our Privacy Officer:

Chief Executive Officer

Address: 8/81 Flinders Street
Adelaide SA 5000

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

We maintain a record of individuals who have opted out of receiving direct marketing communications.