



**Duesburys**

**Accountants & Advisors**

# Privacy Policy

V1.0

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# PRIVACY POLICY

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## 1. Purpose of Policy

Duesburys Accountants & Advisors is committed to protecting the privacy of personal information obtained through its operations as a professional services firm. To delivery our commitment to privacy, we will comply with the relevant government legislation and regulations pertaining to privacy.

Duesburys Accountants & Advisors is bound by the *Privacy Act 1988* (Cth) as amended by the Privacy Amendment (Enhancing Privacy Protection) Act 2013 (Cth) and the 13 Australian Privacy Principles (APPs) contained within that Act. All Directors and employees of Duesburys Accountants & Advisors are required to comply with the Act and this Privacy Statement.

Information or opinions which are collected, held, used or disclosed by Duesburys Accountants & Advisors about an individual whose identity is apparent, or can reasonably be ascertained, will be protected by the standards outlined in this policy.

## 2. Policy Statement

The 13 Australian Privacy Principles apply to personal information, that is, information or an opinion (whether true or not) relating to an identified individual or which can be used to identify that individual. Please note that information about companies is not personal information. However the principles will apply to an individual who is carrying on a business as a sole trader.

To deliver our commitment to privacy, we will:

- Be bound by, and comply with, the APPs under the Act in relation to personal information
- Communicate this Privacy Policy to all employees and stakeholders to ensure awareness of their requirement to comply with our privacy standards and to anyone else who asks for it
- Ensure that lawful, fair and unobtrusive means are used to collect personal information that is necessary for our business purposes
- Collect sensitive information only with the individual's consent and not disclose any personal information to an unrelated third party, except with the individual's consent or where we are permitted to do so by law
- Take reasonable steps to destroy or de-identify personal information in a secure manner when we have no further need for it or are required to do so by law
- Take reasonable steps to ensure that only authorised personnel who have agreed to keep personal information confidential have access to the information
- Take reasonable steps to keep personal information up to date, accurate and complete
- Provide individuals access to their personal information on request, and
- Periodically review and revise this Privacy Policy and related procedures to maintain relevance.

Duesburys Accountants & Advisors recognises and respects the importance of each individual's privacy. This Policy and related procedures ensure all personal information held by Duesburys Accountants & Advisors is handled appropriately and kept confidential.

## 3. The kinds of personal information we collect and hold

Duesburys Accountants & Advisors collects personal information that is reasonably necessary for, or directly related to, its functions or activities, e.g. financial reporting/compilation, auditing, taxation and management consulting services and related business activities.

The specific types of personal information Duesburys Accountants & Advisors may collect and hold includes the following:

- name;
- contact details;
- business/mailling address;
- title;
- nature of business;
- advice received from the client or prospective client that may contain additional personal information, such as family relationships and other business-related connections;
- qualifications, memberships and other accreditations; and
- financial records
- information about potential employees including applications and resumes
- contact information about current and potential suppliers/business associates

As set out below, Duesburys Accountants & Advisors also collects certain information that is not directly and specifically provided by third parties, such as an IP address, browsing pattern on the site, click stream, and the status of cookies placed on a computer. Duesburys Accountants & Advisors does not collect any personal information other than information reasonably necessary for, or directly relating to, the primary purpose for which Duesburys Accountants & Advisors has been engaged or may be engaged, or its other functions and activities.

#### **4. How we collect personal information**

Duesburys Accountants & Advisors only collects personal information that has been directly provided to us by our clients or prospective clients, associates of clients, our suppliers or potential suppliers, our employees or potential employees, or is otherwise available in the public domain where this information will assist us with the provision of services to our current and prospective clients. Information may have been provided verbally or in writing (including by email or through web forms).

Duesburys Accountants & Advisors may from time to time collect personal information concerning an associate of a client or a prospective client (e.g. a spouse or a child) where it is considered unreasonable or impracticable to seek this same information directly from the associate.

By way of example, we may at times seek personal information such as a name, address, date of birth and similar personal information directly from a client in relation to their associate (for example, their spouse, de-facto partner or their children) where we are satisfied that the associate would not object to the provision of that information to us in order for Duesburys Accountants & Advisors to provide services involving that associate.

Also, our website uses cookies to identify site users and their interests and to track usage of the site. Cookies are small pieces of text stored on a computer that help us to know which browser the operator is using, where they have been on the site and any web sites to which they may link in order to use some of our features. By acceptance of our cookie, the user will be permitted access to certain pages of the site without having to log in each time they visit. A user who does not accept the cookie from the site may not be able to access certain areas of the site.

If the user prefers not to accept a cookie, they can set their web browser to warn them before accepting any cookies. Alternatively they can refuse all cookies by turning them off in their web browser.

#### **5. How we use your personal information**

Duesburys Accountants & Advisors may at times use and disclose personal information about an individual for the “primary purpose” of collection (i.e. the dominant or fundamental purpose for which that information is collected). As well as providing services to clients, that “primary purpose” includes facilitating our internal business processes, communicating with clients, prospective clients and other external parties, providing ongoing marketing information about our products and services, complying with our legal obligations and dealing with enquiries and complaints.

In certain circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance where a client would reasonably expect us to and the purpose is related to the purpose of collection).

For tax clients, tax file numbers:

- can be collected by tax agents and accountants;
- can be used only to conduct client's affairs; and
- can be disclosed only to client and the Australian Tax Office.

#### **Sensitive information**

Our policy is that we do not collect sensitive information about our clients or prospective clients. If any of our clients or prospective clients elects to provide us with any sensitive personal information, we will take all reasonable steps to ensure that the sensitive information is securely protected.

## **6. Disclosure of Personal Information**

Personal information is not disclosed to a third party unless the disclosure is necessary to support the delivery of the client services for which Duesburys Accountants & Advisors has been, or is expected to be, engaged, or is required by law.

Examples where personal information may be disclosed to a third party include:

- disclosures to our related companies to provide services;
- superannuation details to a fund administrator;
- Tax File Number Declaration to the Australian Taxation Office;
- where Duesburys Accountants & Advisors is required by law to provide personal information so that Duesburys Accountants & Advisors complies with court orders, subpoenas or other legislation that requires us to provide personal information (for example, a garnishee order).

In certain circumstances, Duesburys Accountants & Advisors may also disclose personal information to third party service providers (such as IT service providers) who assist us to administer our business.

We may also provide a client's or prospective client's personal information to credit reporting bodies and other credit providers. Our separate credit reporting policy sets out how we deal with credit-related information.

Should it be necessary for Duesburys Accountants & Advisors to forward personal information to third parties outside the firm, we will make every effort to ensure that the confidentiality of the information is protected.

#### **Overseas disclosures**

The nature of our business activities may on occasion require that personal information be disclosed to overseas recipients in order to provide the services contemplated under the terms of our engagement or prospective engagement. The location of any overseas recipients of this information will depend upon the nature of the client assignment being conducted or contemplated.

In the event that personal information is disclosed to overseas recipients, Duesburys Accountants & Advisors will take all reasonable steps to ensure that any personal information is secure and treated in accordance with the Australian Privacy Principles.

## **7. How we store your personal information**

Duesburys Accountants & Advisors will take all reasonable steps to protect against the loss, misuse and/or alteration of the information under its control, including through appropriate physical and electronic security strategies. Only authorised Duesburys Accountants & Advisors personnel are provided access to personal information, and these employees are required to treat this information as confidential. We may need to maintain records for a significant period of time. However, when we consider information is no longer needed, we will destroy or de-identify these records.

Personal information must be collected in a lawful and fair manner and the collection must be reasonably necessary for the provision of services provided by Duesburys Accountants & Advisors. Sensitive information must only be collected with consent.

Our policy is that all electronic records are only stored within Australia whenever this is commercially feasible. However, on occasion, a limited number of specialist software applications may involve the storage of personal data at an overseas location where a suitable alternative is not available.

Duesburys Accountants & Advisors will only store data with an external provider if a technical assessment of a service provider's security protocols are considered to meet or exceed the level of security that Duesburys Accountants & Advisors could apply if the electronic data were to be stored in Duesburys Accountants & Advisors own in-house systems and where we are satisfied that Duesburys Accountants & Advisors is able to meet its commitments under Australian Privacy Legislation.

## **8. Accuracy of personal information**

Duesburys Accountants & Advisors will take all reasonable steps to make sure that any personal information collected, used or disclosed is accurate, complete and up to date.

If a person believes that the information we hold is inaccurate or out of date, they may contact our Office Manager and we will update the relevant information accordingly.

## **9. Access to personal information**

Under the Australian Privacy Principles, a person has the right to request access to any personal information that we may hold about them and to advise us if the information should be corrected. The Australian Privacy Principles set out the circumstances when we can refuse those requests. If we do refuse a request, we will provide the person with a written notice that sets out the reasons (unless it would be unreasonable to provide them).

Subject to our right to refuse access, Duesburys Accountants & Advisors will provide the person with a report that lists any personal information that we may hold.

In the event that an individual would prefer to submit a privacy request using a pseudonym or otherwise keep their identity secret, Duesburys Accountants & Advisors will do its best to support that request if it is feasible to do so under the circumstances.

## **10. Retention and disposal of information**

Duesburys Accountants & Advisors will only keep personal information required for the purpose for which it was collected. Duesburys Accountants & Advisors will take reasonable steps to dispose of such information when it has no further requirement to use the information, or it is required by law to do so. Duesburys Accountants & Advisors will take reasonable steps to destroy or de-identify personal information in a secure manner.

## **11. Privacy Enquiries**

If you wish to make an enquiry about your personal information at Duesburys Accountants & Advisors, or make a complaint because you believe that we may have breached the Australian Privacy Principles or a privacy code that applies to us, please email our Office Manager at:

[enquiries@duesburys.com.au](mailto:enquiries@duesburys.com.au) or telephone (07) 4092 1677.

We will respond to each request within a reasonable time.

If a party has lodged a complaint with Duesburys Accountants & Advisors and is not satisfied with our response, they may contact the Commonwealth Information Commissioner.

## **12. Changes to this Privacy Statement**

From time to time it may be necessary for us to review and revise this Privacy Policy. Duesburys Accountants & Advisors reserves the right to change this Privacy Policy at any time. We will notify changes to this privacy policy by posting an updated version on our website [www.duesburys.com.au](http://www.duesburys.com.au).

Our Firms contact details are:

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PO Box 118

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