

Forsyths Privacy Policy

YOUR PRIVACY IS IMPORTANT TO US.

The Forsyths group is committed to providing our clients with the highest levels of accounting and business services, financial services and audit services. This includes protecting client privacy. Forsyths is bound by the Commonwealth Privacy Act 1988 (the Privacy Act), setting out the Australian Privacy Principles which concern the protection of your personal information. This is outlined in our Privacy Policy below.

Forsyths Privacy Policy sets out important information about privacy protections which we extend to the collection and management of your personal information. It does not apply to acts or practices related to employee records of current or former Forsyths employees.

We will update this Privacy Policy as required. For example, as we update and improve our services, modifications may be required. Any changes will be published so that you are always aware of the sort of information we collect, how the information may be used, and under what circumstances it may be disclosed by Forsyths. The latest version of the Privacy Policy can be found at www.forsyths.com.au/Privacy-Policy.

WHAT INFORMATION DOES FORSYTHS COLLECT?

Personal Information is any information or opinion about an individual who is already identified or could reasonably be identified.

Forsyths only collects information that is necessary to assist us in providing our services. We do not collect personal information unless we first ask you for it, you provide it to us or authorise another party to provide it to us, or the information is publicly available. Examples of the types of information we collect include:

- your individual and/or your entity's identity and contact details;
- financial and income information, including government identifiers like tax file numbers;
- share portfolio and other asset information;
- creditor information;
- personal health information for insurance applications and claims management purposes;
- details of your dependants;
- details of your estate planning; and
- other information as required by taxation or other laws.

WHAT IF YOU DO NOT GIVE US THE INFORMATION WE REQUEST?

You are not required to give us the information we request. You may also, in some circumstances, elect to be identified by pseudonym or remain anonymous. It is not an offence to decline to provide your government identifier like your tax file number. However, if you do not give us the information

that we ask you for, or wish to use a pseudonym or remain anonymous, or you provide us with incomplete or inaccurate information, this may adversely impact our ability to provide our services to you, for example:

- Forsyths advice may be inaccurate or incomplete;
- Forsyths may be unable to provide certain services to the individual or entity concerned;
- The provision of (some of) Forsyths services to the individual may be delayed; and/or
- In certain circumstances failure to provide some information may result in documents being submitted to the ATO, ASIC or other statutory bodies late, or not being able to be submitted at all, possibly incurring penalties.

WHAT ABOUT UNSOLICITED INFORMATION?

If we receive personal information that we did not request, or you did not authorise us to receive, we must determine if this is information we could reasonably have requested from you. If it is not, then we are obliged to destroy the information or ensure it is de-identified (so you cannot be identified from it) as soon as practicable. If we decide that the information is something we could have collected, we are obliged to keep this in the same manner as if you had provided it to us yourself.

HOW DOES FORSYTHS COLLECT INFORMATION?

Forsyths collects information about you (individuals and entities) in a number of different ways including:

- from you, when you engage our firm so that we may provide you with financial planning / tax consulting / training / business services / audit / information technology / business recovery and insolvency / human resources / corporate secretarial services;
- from external sources, with prior consent from you, including Australian Security and Investments Commission (ASIC), Fund Managers, Australian Taxation Office (ATO). We ensure that external sources are permitted under the Australian Privacy Principles to disclose the information to us, or have received prior consent from you to release the information to us.
- You may provide this consent when we are appointed by you, in writing, as your:
 - tax agent;
 - financial planner;
 - registered office for a company;
 - company liquidator; or
 - agent for other purposes (for example power of attorney).
- when you make contact with us to enquire about our services;
- when you e-mail us:
 - we will use your e-mail address for the purpose for which you provided it and to raise awareness about recent developments that may be of relevance or interest;
 - your e-mail address will not be added to a commercially available mailing list; and
 - we will not disclose it without your consent.
- Other personal information:
 - will be collected by us by lawful and fair means;
 - will be used for a lawful purpose;
 - will be collected by us with your consent;

and

- will be collected for a clear and explicit purpose; and
- will be collected in accordance with the Australian Privacy Principles.

WHY DOES FORSYTHS COLLECT YOUR INFORMATION AND HOW DO WE USE IT?

We will only collect and use your personal information to provide you with a specific service such as:

- government body and regulator reporting requirements (under taxation, personal assistance or superannuation law);
- managing your financial portfolio;
- provide other services you require;
- administer and manage those services, including charging, billing and collecting debts;
- inform you of ways the services provided to you could be improved;
- advising events, business opportunities and service provision available to clients;
- providing you with news and information relevant to you;
- research and develop our services; and
- maintain and develop our business systems and infrastructure.

Your personal information is also collected to promote and market other services of Forsyths which we consider may be of interest to you. You may notify us at any time that you do not wish to receive marketing or promotional material by contacting our Privacy Officer.

There may be circumstances where Forsyths is required or authorised by law, court or tribunal order to collect and/or release information about you or your organisation, including your government related identifiers. Other sensitive information such as religion; race; political opinion; membership of a political association; religious beliefs or affiliations; sexual preferences or practices; criminal records; or health information will only be collected and/or used where this is required by law or by the service we are providing to you.

WHO CAN FORSYTHS DISCLOSE YOUR PERSONAL INFORMATION TO?

We may provide your information to various organisations and/or parties in order to fulfil our client services and legal obligations, including, but not limited to:

- your legal personal representative
- Professional bodies, such as Chartered Accountants Australia & New Zealand (CA ANZ) or CPA Australia, for quality control purposes or to satisfy our membership obligations;
- Banking, financial and insurance institutions and their associated service providers;
- Superannuation bodies;
- Fund Managers;
- Government, regulatory and other statutory bodies;
- Law enforcement agencies;
- Your professional advisers, or entities who have referred you to us;
- Auditors.

Forsyths will not sell, exchange, trade or otherwise supply to third parties any personal information obtained from you without your prior consent.

DISCLOSURE OF PERSONAL INFORMATION TO OVERSEAS RECIPIENTS

In certain circumstances, we may disclose your personal information to overseas recipients in order to provide our services and operate our business efficiently.

This may occur where:

- We engage offshore service providers to assist with administrative, accounting, taxation, corporate services, financial planning support, superannuation processing, paraplanning, compliance, or other business support functions;
- We use cloud-based software platforms or technology service providers whose data storage, processing or support services are located outside Australia; or
- Our Australian-based service providers utilise personnel or subcontractors located overseas to access or process information on our behalf.

The countries in which these overseas recipients are likely to be located include:

- The Philippines (including financial services administrative and business support services);
- India (including superannuation, audit and business processing support services);
- The United States, Canada, New Zealand, Singapore, Hong Kong, the United Kingdom, and the Netherlands (including cloud hosting, data storage and technology service providers);
- Other jurisdictions where our contracted service providers operate from time to time.

We take reasonable steps to ensure that any overseas recipient handles your personal information in a manner consistent with the Australian Privacy Principles. These steps may include:

- Conducting due diligence on service providers;
- Implementing contractual arrangements requiring compliance with Australian privacy obligations;
- Requiring appropriate technical and organisational security measures; and
- Monitoring and reviewing outsourcing arrangements on a periodic basis.

Where we disclose your personal information to overseas recipients, we remain accountable under the Privacy Act 1988 (Cth) for that information in accordance with the Australian Privacy Principles.

You acknowledge that, due to the nature of cloud technology and global data networks, personal information may be stored in multiple international locations and that overseas jurisdictions may not have privacy laws equivalent to those in Australia.

HELP US TO ENSURE WE HOLD ACCURATE INFORMATION

We take all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. However, the accuracy of the information we hold depends to a large extent on the information you provide.

If you believe that the information we hold about you is inaccurate, or incomplete, please ask us to correct it. We may need you to put your request in writing but will never charge you a fee for updating your information.

HOW WILL FORSYTHS KEEP YOUR PERSONAL INFORMATION SECURE?

To protect the quality and integrity of personal information kept about you, Forsyths has implemented appropriate industry standard techniques, technological and organisational measures to protect against loss, misuse, unauthorised access to and/or alteration of the information under our control.

We may use a third party service provider to provide hardware or software services that hold your personal information. Where we do so, we rely on our third party selection processes, strict confidentiality clauses in agreements and those parties' own privacy and security measures.

We take reasonable steps to ensure that any personal information transmitted via email or our website is stored securely. Unfortunately, no data transmission over the Internet can be guaranteed to be 100% secure. While we strive to protect your personal information from misuse, loss and unauthorised access, we cannot guarantee the security of any information you transmit to us or receive from our online products or services. Once we receive your transmission, we make our best effort to ensure its security.

We have an obligation to report data breaches to the Office of the Australian Information Commissioner (OAIC) in certain circumstances. In the unlikely event that we have to notify the OAIC we will also notify the individuals affected.

Forsyths' and other websites accessed through our site may use "cookies". These are small files a web site can transfer to your computer hard drive for record keeping, to make web sites easier to use by storing information about your preferences. Parts of our web site may use cookies to store basic statistical data, to help us understand how it is used. We make no attempt made to identify individual users in any way. On each use, a session cookie may be temporarily placed on your computer, used to maintain navigation information during your site visit and automatically deleted from your computer at the end of each Internet session. Most Internet browsers are pre-set to accept cookies. If you prefer not to receive them, adjust your browser to refuse cookies or to warn you when cookies are being used.

Other web sites that may be accessed through our site may collect personally identifiable information about you. The information practices of those third-party web sites are not covered by this policy.

HOW CAN YOU ACCESS THE INFORMATION WE HOLD ABOUT YOU?

You can request, at any time, for us to give you access to the personal information we hold about you. We are obliged to give you access within a reasonable period of making the request. The making of requests for access is at no cost to you, however, we may charge a reasonable fee to cover costs associated with providing you access. The APPs set out instances where we are not required to give you access. Where we decide that we cannot give you access, we are obliged to inform you and tell you why.

HOW LONG CAN FORSYTHS KEEP YOUR PERSONAL INFORMATION?

Various laws impose different requirements on the retention of information. Depending on the context, we are required to maintain your information for a period ranging from 7 years to permanently.

When your personal information is no longer used, needed or required to be retained by Forsyths, we will destroy or permanently de-identify personal information. Our ability to destroy information is limited by legislative requirement to retain records for a period of time.

WHAT CAN YOU DO IF YOU ARE NOT HAPPY WITH OUR HANDLING OF YOUR INFORMATION?

If you believe that we have mishandled your personal information and breached the Australian Privacy Principles, you may lodge a complaint with our Compliance Officer. We will endeavour to resolve this within 30 days. Under s36(3) of the Privacy Act, this must be in writing. Complaints should be addressed to:

The Compliance Officer
Forsyths
PO Box 758
Tamworth NSW 2340

In the event we are unable to resolve your issue, you may lodge a complaint with the Information Commissioner. You can do this by submitting an on-line form through the Information Commissioner's website www.oaic.gov.au, or obtaining the hard copy form from the website and sending it to the Office of the Australian Information Commissioner. You can also call their Enquiries Line on 1300 363 992.

HOW CAN YOU CONTACT US?

TAMWORTH

(02) 6763 0100
Level 3, 201 Marius Street
PO Box 758
Tamworth NSW 2340

ARMIDALE

(02) 6773 8400
121 Rusden Street
PO Box 114
Armidale NSW 2350

GUNNEDAH

(02) 6743 0800
286 Connadilly Street
PO Box 97
Gunnedah NSW 2380

COONABARABRAN

(02) 6842 0000
60 John Street
PO Box 468
Coonabarabran NSW 2357

INVERELL

(02) 6773 8400
19 Byron Street
Inverell NSW 2360
PO Box 114
Armidale NSW 2350

Website: www.forsyths.com.au