

## INTRODUCTION

This privacy policies applies to TWB Accountants and TWB Pty Ltd ABN 96 591 688 932 (“TWB” or “we”)

This policy outlines how TWB handles the personal information and sensitive information and how it complies with the Australian Privacy Act 1988 (Cth) (“Privacy Act”) and the Office of the Australian Information Commissioner’s (OAIC) APP guidelines

This policy relates to TWB’s collection and handling of personal and sensitive information that is covered by the Privacy Act and does not cover personal information that is outside the scope of the Privacy Act.

TWB is committed to meeting these obligations and if you have any queries in respect of this policy please contact the directors at TWB by emailing [twb@twb.com.au](mailto:twb@twb.com.au)

## COLLECTION

Since inception, TWB’s goal to our clients has been to provide the highest quality of professional service possible and the collection of information will enable us to provide our valued clients with such service.

TWB collects personal information from you in a variety of ways, including personal interaction and via electronic means.

Information may also be collected from third parties, such as your bank or financial advisor.

The main types of personal information we will collect and hold includes;

- Name and contact details
- Date of birth
- Employment details and history
- Tax file numbers
- Details of financial circumstances including assets, liabilities, income, expenses, insurance cover, superannuation and health insurance
- Any other information that you knowingly provide

Failure to collect this information would limit our ability to provide the expected value service.

## USE OF INFORMATION

TWB will use the information with your consent for the following:

- Providing professional services
- Manage any requests made by you

- Contact you to provide you with any information, via telephone, email, mail and any other mode
- General management of our business activities including invoicing
- Any other purposes relevant to our professional association with you
- Investigation of any complaints

## DISCLOSURE OF INFORMATION

Throughout the course of performing our duties, TWB may be required to disclose information to a third party. This is done to the extent permitted by law and as set out in this policy.

The information may be disclosed to:

- TWB staff, advisors and consultants who ordinarily are engaged in providing our services
- TWB information technology service providers who maintain our software programs
- Any provision of outsourced services
- Auditors engaged by TWB to perform audits as required by Law or Professional Associations.
- Any courts, tribunals or regulatory authorities (eg Australian Taxation Office , ASIC) as required by law and in accordance with the Code of Ethics for Professional Accountants
- Anyone else to whom you consent or have requested, including financial institutions

## MARKETING

TWB does not partake in any marketing offers and will forward only information that is relevant and may assist you.

TWB may at times, distribute a newsletter or an email advice regarding particular events, or updates.

## DATA QUALITY

TWB will endeavour at all times to maintain the personal information we hold, up to date and accurate.

Changes inevitably are required and if you become aware that the information is not correct, please contact us.

## NEW PRODUCTS AND SERVICES

If any new products or services are undertaken, TWB will contact you and advise accordingly. In the event that this affects the information held, we will advise of any consequences, together with how we propose to deal with any changes.

## SECURITY

TWB is committed to ensuring that the information you provide is secure.

TWB has suitable physical, electronic and managerial procedures to safeguard and secure the information and protect it from misuse, interference, loss, unauthorised access, modification or disclosure.

TWB employees and advisors are required to protect the confidentiality of personal information in accordance with our policy manual and quality control manual.

Transmission of the information is carried out at your own risk and TWB cannot guarantee the security of any information that you transmit to us or receive from us. Although TWB take the appropriate measures to safeguard the information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

TWB will retain the personal information for as long as necessary to fulfil the purpose for which it was collected and as required by law and in accordance with documentation retention legislation.

Any information no longer required will be permanently destroyed.

## ACCESS

You may request and access any information that TWB holds on your behalf.

Where possible we will provide access directly or provide copies of the information requested.

If you would like a summary of the information held, please email us at [twb@twb.com.au](mailto:twb@twb.com.au)

If you believe the information held is not accurate, please let us know.

TWB reserve the right to charge a fee for supplying the information.

TWB may deny your request in certain circumstances where it may be unlawful and we will explain the reasons when access is denied.

## GOVERNMENT IDENTIFIERS

The information collected by TWB may include government identifiers such as your tax file number.

TWB will not use a government identifier as your unique identifier within our systems. We will not disclose any of your government related identifiers without your express consent.

## TRANS BORDER FLOWS

TWB does not have any accounting professionals located outside of Australia who work on client assignments.

TWB use an external IT service provider and cloud based accounting software for our practice management and taxation and accounting financial reporting which contains your personal information. The database containing this information is located in Melbourne, but it may be replicated to other locations. Our software providers have privacy policies that are consistent with the Privacy Act.

If TWB is required to transact or send information to an overseas organisation on your behalf, we will seek your consent.

## SENSITIVE INFORMATION

Generally, TWB does not collect sensitive information. Sensitive information includes health records, race, ethnic origin, political views, religion, trade associations, sexual preference and criminal records.

It will only be collected as permitted under the Privacy Act and if required it will only be used for the purpose for which it was provided with your consent.

## CONTACT DETAILS AND COMPLAINTS

Please contact the director responsible for management of your work if you have any complaints about our Privacy Statement or if we have failed to keep our commitments to you.

Any other director can also be contacted if you have a complaint.

TWB take complaints seriously and are committed to resolving them as soon as possible.

## OTHER MATTERS

This policy will be updated as and when required.

TWB complies with the Notifiable Data Breaches (NDB) Scheme

TWB does not collect information covered by the Privacy Act from our website.

TWB is developing the use of a client portal, which is managed via our document storage facility (HowNow) and this service provider has privacy policies that are consistent with the Privacy Act.