

About This Policy

1. This privacy policy is intended to explain clearly and in plain language some of the key processes and procedures that we have implemented to manage your personal information, to protect your privacy and to comply with the *Privacy Act 1988* (Cth), the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* (Cth) (**Act**) and the APPs.
2. References to "our", "us" and "we" in this privacy policy are references to Smart Tax Partners (**STP**).
3. <https://smarttaxpartners.com> (**Website**) is owned and administered by STP.
4. This privacy policy gives a broad overview of our policies in relation to privacy. If you require further information, please contact us.
5. You must read this privacy policy before providing us with any personal information and before submitting personal information through the Website. By providing us with your personal information or by using the Website, you are confirming your agreement to the policies and procedures described in this privacy policy.

Our Privacy Commitment

6. We are committed to managing your personal information openly and transparently and to keeping your personal information safe. We will take all necessary measures to fulfil this commitment, including to:
 - (a) comply with the Australian Privacy Principles (**APPs**);
 - (b) ensure that we manage your personal information openly and transparently;
 - (c) only collect personal information from you that we need in order to offer you the best possible service;
 - (d) tell you how we might use your personal information;
 - (e) let you know if we need to disclose your personal information to anyone else (including anyone overseas) and if so, in what circumstances this might occur;
 - (f) keep your personal information secure;
 - (g) promptly respond to any request by you not to receive direct marketing material from us;
 - (h) make sure your personal information is kept accurate and up-to-date and to properly dispose of any personal information which is no longer required by us; and
 - (i) ensure that, where appropriate, you can access and correct your personal information.

What sorts of personal information do we collect?

7. We will only collect from you information that is necessary and relevant to our relationship with you, including to enable us to provide to you the best possible service.
8. Depending on the exact nature of our relationship with you, we may request that you provide some or all of the following information:
 - (a) information that we may require to initially identify you, including your name, home address and your date of birth;
 - (b) information that we can use to contact you, including your telephone number, mobile number, email address, work address, mailing address;
 - (c) information we may require to confirm your identity, including your driver's licence number, passport details, business name, Medicare card; and
 - (d) information that may be required to process payments by you, including your credit card details.

9. The Act places restrictions on us collecting sensitive information about you (which includes information about your religion, political views, ethnicity, criminal records and sexual preferences). Generally we will not collect this type of information.

Why do we require your personal information?

10. The main reason that we will need to collect your personal information will be relating to a service that we are providing to you or are about to provide to you and for contacting you in relation to those services. Our main services include the provision of accounting, taxation and wealth management services and related services.
11. We may also use your personal information for other reasons, including:
- (a) to contact you in relation to an event, special offer or particular service that you might be interested in;
 - (b) to prevent fraud and other criminal activities;
 - (c) to assist us to run our business and to improve our services; and
 - (d) to comply with our legal obligations.
12. There is no obligation for you to provide us with any of your personal information but if you choose not to provide us with your personal information, we may not be able to provide the information, goods or services that you require.

How do we collect your personal information?

13. The means by which we collect your personal information will depend on the nature of the service that we are providing to you.
14. We may collect your personal information:
- (a) directly from you, either in person, via email or over the phone;
 - (b) when you access and interact with the Website and with our cloud file-sharing services;
 - (c) from publicly available sources, for example, the electoral role, the telephone directory or from other websites; or
 - (d) from other sources.
15. We will always collect your personal information directly from you unless it is impracticable to do so. This would usually be done through application forms, over the telephone, in person or over the internet.
16. Your personal information will not be collected if you are only browsing the Website.

How do we collect your personal information?

17. The means by which we collect your personal information will depend on the nature of the services that we are providing to you.
18. We may collect your personal information:
- (a) directly from you, either in person, via email or our Website or any other social media platforms or third-party cloud file-sharing services or over the phone;
 - (b) when you complete any request, whether in person or online, which requires that we process your requests for services provided by us or a third-party service provider; and
 - (c) from publicly available sources, for example, the electoral role, the telephone directory or from third parties including but not limited to third party service providers or other third party websites, social media accounts or apps.
19. We will always collect your personal information directly from you unless it is impracticable to do so.

Unsolicited personal information

20. From time to time we may receive personal information about you that we have not requested or taken steps to come to know. In these circumstances, we will only hold on to such information as permitted by the Act. Any information that has not been requested but is subsequently retained by us will be subject to the procedures and requirements set out in this privacy policy.

How do we use or disclose your personal information?

21. We may use and disclose your personal information for the purposes for which it was collected or for a related purpose such as:
- (a) to consider your request for a product or service;
 - (b) to enable us to provide a product or a service to you;
 - (c) to facilitate the provision of a service to you;
 - (d) to carry out or respond to your requests;
 - (e) for regulatory reporting and compliance with our legal obligations;
 - (f) to various regulatory bodies and law enforcement officials and agencies to protect against fraud and for related security purposes;
 - (g) to perform administrative and operational tasks (including risk management, systems development and testing, staff training and collecting debts);
 - (h) to include in a database compiled by us for use in direct marketing of promotions, products and services we think may be of interest to you;
 - (i) to seek your feedback in relation to customer satisfaction and our relationship with you;
 - (j) to monitor or improve the quality and standard of service that we provide to you;
 - (k) to consider any concerns or complaints you may raise against us;
 - (l) to our successors and/or assigns;
 - (m) to notify you of offers that may be of interest to you; and
 - (n) to better understand your preferences.
22. By agreeing to accept the terms of this privacy policy and in providing your personal information to us, you are taken to have consented to the use of your personal information for the above purposes.
23. Other than the above, we will not disclose your personal information without your consent unless disclosure is either necessary to prevent a threat to life or health, authorised or required by law, reasonably necessary to enforce the law or necessary to investigate a suspected unlawful activity.

Do we share your personal information with others?

24. We may share your personal information with other entities that are related to STP. By providing your personal information to us, you consent to your personal information being shared with other entities within our group.
25. We deal with third party service providers who may assist us with a variety of functions including with security, insurance, professional advisory (including legal, accounting and auditing advice), banking, payment processing, credit reporting, offsite storage or technology services. Where we engage third party service providers to perform services for us, those third parties may be required to handle your personal information. Under these circumstances, those third parties must safeguard this information and must only use it for the purposes for which it was supplied and we will make all reasonable enquiries to try to ensure that this is the case.

26. Wherever possible, we will limit the information provided to independent third parties to that information required for those third parties to properly perform their functions. Further, our contracts with these third parties will always require the third parties to comply with the APPs (or equivalent standards).

How do we store your personal information?

27. We have implemented appropriate processes and techniques to protect personal information from loss, misuse and interference and from unauthorised access, modification or disclosure. In addition, access to your personal information is limited to those who specifically need it to conduct their responsibilities.
28. We take all necessary steps to destroy or permanently de-identify your personal information where it is no longer required and to protect your personal information from loss, misuse and interference and from unauthorised access, modification or disclosure.
29. While care is taken to protect your personal information, unfortunately no data transmission over the Internet is guaranteed as 100% secure. Accordingly, we cannot ensure or warrant the security of any information you send to us or receive from us online. This is particularly true for information you send to us via email as we have no way of protecting that information until it reaches us. Once we receive your personal information, we are required to protect it in accordance with the Act.

Maintaining Your Personal Information

30. We take reasonable steps to ensure that:
- (a) the information that we collect about you is accurate, complete and up-to-date at the time of collection;
 - (b) when we use your personal information, it is accurate, up-to-date, complete and accurate at the time of use; and
 - (c) if we disclose your personal information, it is accurate, up-to-date, complete and accurate at the time of disclosure.

What if there is a breach in relation to my personal information?

31. We take breaches of your privacy very seriously. If there is a data breach relating to personal information that we hold about you, such as loss of, unauthorised access to, or unauthorised disclosure of, the information (**Data Breach**), we will take immediate steps to contain and remedy any effects of the Data Breach. Where required under the Act, we will notify both you and the Office of the Australian Information Commissioner (**OAIC**) of the Data Breach.

Will we disclose your personal information to anyone overseas?

32. There may be circumstances where we need to disclose your personal information to a third party overseas (**Overseas Recipients**). This may occur, for example, where we have a database or server hosted outside Australia or where you are interacting with an application which is based overseas.
33. Prior to us disclosing your personal information to an Overseas Recipient, we have an obligation under APP 8.1 to take reasonable steps to ensure that the Overseas Recipient does not breach the APPs (the **Overseas Disclosure Obligations**).
34. We will take all reasonable steps to satisfy our Overseas Disclosure Obligations.

How can you access your personal information?

35. Usually we will be able to provide you with access to your personal information upon receipt of your written request, either by email or by post using the contact details set out in this privacy policy, and confirmation of your identity. There are some limited circumstances in which we may not be able to provide you with access to your personal information when requested.

Such circumstances might include where access would pose a serious threat to the life, health or safety of another person or where such access would unreasonably impact on the privacy of others.

36. Where you request access to your personal information, we will respond to any such request within a reasonable period after the request is made and if possible, we will provide you with access to your information in the manner requested by you, if specified. In any event, we will take all reasonable steps to give you access to your information in a way that meets your needs.
37. If we deny you access to your personal information for any reason, or if we are unable to provide you with access to your information in the manner requested by you, then we will provide you with a written notice confirming:
 - (a) the reason for such refusal; and
 - (b) the procedure to complain about the refusal.
38. We may recover from you our reasonable costs of supplying you with access to your personal information but we will not charge you for any request you might make to access your information.

How can you seek to correct your personal information?

39. We do what we can to ensure that the information we hold about you is accurate, complete, up-to-date, relevant and not misleading. To assist us to do this, please ensure that you provide us with correct information at the time you provide it to us and immediately inform us if your details change at any time. If we are concerned that any of your information is inaccurate, incomplete, out-of-date, irrelevant or misleading, or if you request that we correct any of your information, then we will take all reasonable steps to correct the information to ensure that it is accurate, complete, up-to-date, relevant and not misleading in the context of the purpose for which it is held.
40. If we correct any of your personal information and that information has previously been disclosed to another entity that is required to comply with the APPs, then, upon your request to do so, we will take reasonable steps to notify that other entity of the correction unless such notification is impracticable or unlawful.
41. If we refuse to correct your personal information following a request by you to do so, then we will provide you with a written notice confirming:
 - (a) the reason for such refusal; and
 - (b) the procedure to complain about the refusal.
42. If we refuse to correct your personal information following a request by you to do so and you request that we associate with the information a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading then we will take reasonable steps to associate the statement with the information so that the statement is apparent to users of the information.
43. We will respond to any requests regarding the correction of your personal information within a reasonable period after the request is made.
44. We will not charge you for any request to correct your personal information, nor will we pass on to you any costs incurred by us in correcting your personal information or for associating a statement with your personal information.

What if you want to make a complaint about some aspect of our privacy procedures?

45. We are committed to maintaining and protecting your privacy but it is possible that in limited circumstances, mistakes might be made. If you are concerned with the way your personal information has been handled then you are entitled to make a complaint. If you would like to lodge a complaint, please contact us using our contact details set out in this policy

46. If your personal information has not been handled in an appropriate way, we will do our best to remedy your concerns as quickly as possible.
47. If your complaint is not satisfactorily resolved, you may approach an external dispute resolution service or apply to the Office of the Australian Information Commissioner (**OAIC**) to have the complaint heard and determined.

Protecting Your Identity

48. Wherever it is practicable, we will always provide you with the option not to identify yourself when dealing with us. Alternatively, you may elect to use a pseudonym to protect your identity.

Links to other Websites

49. The Website may contain links to websites which are owned or operated by other parties. You should make your own enquiries as to the privacy policies of these parties. We are not responsible for information on, or the privacy practices of, such websites.

Changes to this Privacy Policy

50. From time to time it may be necessary for us to review and revise this privacy policy. We reserve the right to change our privacy policy at any time.

How can you contact us?

51. Please find below our contact details. Please do not hesitate to contact us in relation to any privacy-related concerns and we will use our best endeavours to address any such concerns thoroughly and in a timely manner.

Privacy Compliance Officer
Julie Wass
Smart Tax Partners
PO Box 5
Neutral Bay Junction NSW
Telephone: 0402 913413
Email: advice@smarttaxpartners.com.au

52. If it is practical to do so, you can contact us without identifying yourself. However, if you choose not to identify yourself, it may be more difficult for us to assist you with your enquiry. This will depend on the nature of your enquiry.

Express consent to collection, storage, use and disclosure

53. In addition to the other consents provided by you above, by agreeing to accept the terms of this privacy policy, or by providing your personal information to us, or both, you are taken to have expressly consented to the collection, storage, use and disclosure of your personal information for each of the purposes and to all of the parties outlined in this privacy policy.