

Privacy Policy

Version Number 1.0

Ingenious Brokers Pty Ltd (**'Ingenious Brokers'**) respects your privacy and is committed to protecting your privacy. At **Ingenious Brokers**, we understand the importance you attach to information that identifies you (your 'personal information') and we want to help you protect it.

We are bound by and committed to supporting, the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy explains how we handle information that we learn about you when you submit any personal information to us or our associated entities in person, by mail or by email.

How Do We Collect Personal Information from You?

We will only collect personal information which you have voluntarily provided to us or consented to us collecting the information.

We may collect personal information about you in a variety of ways, for example:

- ▶ when you retain our services or apply for employment with us.
- ▶ when you subscribe to our newsletter or mailing list (if applicable).
- ▶ when you contact us or our associated entities, for example by mail, email, or telephone.
- ▶ Indirectly from fund managers, superannuation funds, life insurance companies and other product issuers once you have authorised us to obtain such information or authorised other parties to provide us with this information.

However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

What Type of Personal Information Do We Collect?

The type of personal information we may collect from you includes (but is not limited to):

- ▶ names, dates of birth, gender, address, email, phone numbers, educational qualifications, employment history salary and job titles.
- ▶ information in documents such as passport, driver's licence, tax file numbers (TFNs), Medicare Number.
- ▶ financial information including details of superannuation, insurance arrangements bank account details, shareholdings, and details of investments.
- ▶ sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties.
- ▶ visa or work permit status; and
- ▶ personal information about your spouse and dependants.

How Do We Use Your Personal Information?

Ingenious Brokers and our associated entities will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as accounting or business advisory services. We may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

How Do We Disclose Your Personal Information?

Your personal information will only be disclosed to those employees or consultants of **Ingenious Brokers**, and its associated entities related to the agreed provision of services. Depending on the nature of the engagement, we may need to disclose your personal information to third parties which may include service and content providers (for example accounting or auditing service providers), dealers and agents, or our contractors and advisors.

Ingenious Brokers and its associated entities shall not knowingly provide personal information to any third party for any other purpose without your prior consent unless ordered to do so by a law enforcement body, court of law or other governmental or regulatory body or agency.

Access to Your Personal Information

You can request us to provide you with access to personal information we hold about you by sending us an email:

info@ingeniousbrokers.com.au (no spam please) or writing to us at **4/4 Truman Street, South Kingsville, VIC. 3015**. We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will not apply to lodging a request for access.

Your request to access your personal information will be dealt with in a reasonable time. Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.

Accuracy & Correction

To enable us to keep our records properly, please notify us if you believe that any information, we hold about you is inaccurate, incomplete, or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an e-mail: info@ingeniousbrokers.com.au (no spam please) or writing to us at **4/4 Truman Street, South Kingsville, VIC, 3015**.

Our Security Procedures

Ingenious Brokers takes your privacy and the privacy of its associated entities and their clients very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification, and disclosure. We will also de-identify and destroy the personal information we hold about you once our legal obligations cease. Our security procedures are reviewed from time to time, and we update them when relevant.

However, please be aware that the transmission of data over the Internet is never guaranteed to be completely secure. It is possible that third parties not under the control of **Ingenious Brokers** may be able to access or intercept transmissions or private communications without **Ingenious Brokers'** permission or knowledge. **Ingenious Brokers** takes all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

Data Breach Notification

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth), **Ingenious Brokers** is required to give notice to the Australian Information Commissioner (**OAIC**) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

"Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination, or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.

If you are likely to suffer serious harm from a data breach, we will notify you of:

- ▶ the nature of the eligible data breach (i.e., how the information was accessed or disclosed).
- ▶ the type of information that was accessed or disclosed.
- ▶ the steps that we have taken to control or reduce the harm, and those that we plan to take.
- ▶ any assistance we can offer you, such as arranging for credit monitoring.
- ▶ anything that we can suggest you can do to assist yourself or mitigate the harm.
- ▶ whether the breach has also been notified to the OAIC.
- ▶ how you can contact us for information or to complain; and
- ▶ how to make a complaint with the OAIC.

We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will email the notification.

There are some circumstances in which we do not have to notify you of a data breach. These include:

- ▶ where we have taken remedial action before any serious harm has been caused by the breach.
- ▶ if you have been notified of a breach by another entity.
- ▶ if notification would be inconsistent with Commonwealth secrecy laws; or
- ▶ where the Commissioner declares that notification does not have to be given.

Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

Identifiers

We will not adopt as our own, any government identifiers you may provide to us such as TFNs etc.

Changes to our Privacy Policy

This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will email any changes to you. By continuing to provide us with your information, you confirm your acceptance of these changes.

Complaints Resolution

Ingenious Brokers is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way, we have handled your privacy, please send us an e-mail at info@ingeniousbrokers.com.au or write to us at **4/4 Truman Street, South Kingsville, VIC, 3015**. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe. However, if after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at www.oaic.gov.au

Issued by: Ingenious Brokers Pty Ltd

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