Title: Privacy Policy

Department: Human Resources



M+S Group Accounting is committed to providing quality services to you and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We comply with the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The APPs govern the way in which we collect, use, disclose, store, secure, access and dispose of your Personal Information.

The Privacy Act exemptions for small businesses do not apply to us as we collect personal and sensitive information in the course of providing services, therefore we are required to develop and maintain practices and security measures to comply with the APPs.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Australian Information Commissioner at <u>www.aoic.gov.au</u>

What is Personal Information and why do we collect it?

Personal Information is information or an opinion that identifies an individual. We only collect information that is required for us to provide Accounting and Advisory work to you. We may also receive information from third parties such as Financial Planners, Banks or other professionals, where a client has authorised this.

Examples of Information we collect include: Full name, addresses, date of birth, email addresses, phone numbers, gender, marital status, dependent details, financial information.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone, facsimile, by email, via our website www.msgroup.com.au, from your website, from media and publications, from other publicly available sources, from cookies and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure. You may unsubscribe from our mailing/marketing lists at any time by contacting us in writing. When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

When collecting a Tax File Number, an explicit consent to collect, store and use must be provided by the client in accordance with TFN legislation. This record must be retained on the client file.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose

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• With your consent; or where required or authorised by law.

Unsolicited personal information

An individual may provide us with unsolicited information i.e. information which we did not solicit.

Unsolicited personal information will be destroyed, de-identified or return to the client as soon as practicable, but only if lawful and reasonable to do so, and only if the information is not public knowledge.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; and
- Where required or authorised by law

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorised access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 7 years.

M+S Group accounting trains its staffs carefully on managing personal data and privacy of such information.

Direct marketing

M+S Group accounting may engage in direct marketing to you from time to time.

When required, your personal information will only be used or disclosed for direct marketing where the information is not sensitive information, is collected directly from you and there is an easy means to opt out of such marketing (and such an opt out request has not been made) in the following circumstances:

• Where you would expect M+S Group Accounting to use or disclose the information

for direct marketing purposes; or

 You have consented to the use or disclosure of the information for direct marketing purposes.

If you do not wish to receive these materials, please contact our privacy officer.

How we store information

We store all personal information in electronic format in facilities [in secure onsite server storage alongside with cloud-based storage. Hard copy paper files are stored securely with access restricted only to those staff who require access to the information].

We maintain high data security standards to reduce the risk of unauthorised access to

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confidential or sensitive information.

Should a data breach occur, the data breach assessment and reporting procedure must be followed, which includes an obligation to notify clients or report to the Office of the Australian Information Commissioner in certain circumstances.

Any original client documents must be returned after scanning.

We are required to retain most records for at least 7 years, or 7 years after the cessation of services being provided to a client. However, at times we may need to permanently retain records.

Access to your Personal Information

You may access the Personal Information we hold about you and to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

M+S Group Accounting will not charge any fee for your access request, but may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is an important to us that your Personal Information is up to date. We will take reasonable steps to make sure that your Personal Information is accurate, complete and up-to-date. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Policy Updates

This Policy may change from time to time and is available on request.

Privacy Policy Complaints and Enquiries

If you have any queries or complaints about our Privacy Policy please contact us at:

M+S Group Accounting Attention: Privacy Officer office@msgroup.net.au

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