

Privacy and Spam Policy

Acomplì Limited

Our Commitment

Acomplì Limited (Acomplì) is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Amendment (Private Sector) Act, 2000 sets out a number of National Privacy Principles (NPPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

Acomplì Privacy Policy discloses how the personal information you provide to us and our representatives, is collected, used, held, disclosed and disseminated.

Acomplì is required to meet particular legislative and regulatory requirements. In order to provide comprehensive advice to you, we are required to collect certain personal information from you.

- Providing you with the relevant service
- Managing and administering the service
- Protecting against fraud

We encourage you to check our website regularly for any updates to our Privacy Policy.

Your Personal Information

As a compliance service provider we may need to collect certain information about you, and your business, in order to provide our services to you. However we will only collect information that is necessary and pertinent to the services you request.

How We Collect Personal Information

Acomplì collects personal information in a number of ways, including:

- directly from you, when you attend a face-to face interview;
- directly from you, when you provide information in writing;
- directly from you, when you provide information by phone;
- directly from you via an email or the internet; and
- directly from third parties once authorisation has been provided by you. You have a right to refuse us authorisation to collect information from a third party.

How We Use Your Personal Information

The information in this document details how we comply with the Privacy Act including:

- What is the purpose?
- Who is my information disclosed to?
- What law requires collection?
- What are the consequences?

Primarily, your personal information is used in order to provide comprehensive and/or limited compliance advisory services to you. We may also use the information that is related to the primary purpose and it is reasonable for you to expect the information to be disclosed.

From time to time, we may provide you with direct marketing material. This will include articles and newsletters that may be of interest to you. If, at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

If you provide inaccurate or incomplete information we may not be able to provide you with the services you are seeking.

When We Disclose Your Personal Information*

In line with modern business practices common to many institutions and to meet your specific needs we may disclose your personal information to organisations outside Acomplì. The organisations to which we disclose information may include:

- audit contractors or temporary staff to handle workloads during peak periods;
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers to maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems;
- government or regulatory authorities only when required by law;
- another consultant of Acomplì if necessary;
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business.
- a new owner of our business that will require the transfer of your personal information.

In addition, our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Acomplì.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

How We Store and Secure Your Personal Information

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours.

Your personal information may also be held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site. Other measures taken are:

- Confidentiality requirements for our employees
- Security measures for systems access
- Providing a discreet environment for confidential discussions

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal

information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

Ensure Your Personal Information Is Correct

Acomplì takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist under law where we will not provide you with access to your personal information. Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

Dealing with us anonymously

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

Complaints Resolutions

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

Our Website

Acomplì website provides links to third party websites. The use of your information by these third party sites is not within the control of Acomplì and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy stands, policies and procedures.

You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to

ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Spam Act

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

Acomplì complies with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, Acomplì makes sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

Internal Procedure for dealing with complaints

The three key steps Acomplì follows:

- Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about the person that is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Comply with the law regarding viral messages

Acomplì ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have Consented to receiving Commercial Communications.

Contact Details

Privacy Officer: **Lillian Oh**
Address: **6 Lyall Street**
South Perth, WA 6151
Telephone : **(08) 9474 5100**
Facsimile: **(08) 9474 5188**
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