



Privacy Policy of Vlassis & Co updated 14 September 2023

Vlassis & Co are committed to manage any personal information we collect from our clients in an open and transparent way.

This policy outlines the obligations Vlassis & Co has in managing and protecting the personal information we collect, hold, use, store about our clients, contractors and others, in order to comply with the Privacy Act. Our Privacy Policy relates to how we address each of the Australian Privacy Principles (APPs) set out in the Privacy Act 1988. This includes information such as your name, email address, identification number, or any other type of information that can reasonably identify an individual, either directly or indirectly. This policy is not intended to, nor can it, replace the provisions Acts themselves. The Privacy Policy does not apply to acts or practices that are directly related to employee records of current or former employees.

We also maintain an internal privacy policy, engagement letters and standard terms and conditions governing the delivery of professional services which also describes how we handle personal, sensitive, and special categories of information. By providing your personal information to Vlassis & Co you are agreeing to be bound by our Privacy Policy.

Information we Collect

The type of personal information we may collect, and hold depends on the nature of our engagement with you.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

In general, the main types of personal information we collect and hold includes (but is not limited to):

- Names
- Contact details
- Gender
- Dates of Birth
- Employment details and employment history
- Tax File Numbers
- Details of your financial circumstances, including bank account details, your assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation
- Health information (for some types of insurance cover)
- Details of your investment preferences and aversion or tolerance to risk (if a wealth advisory client)

We will not usually seek to collect sensitive information (e.g. data relating to professional memberships, race or ethnic origin, religious beliefs, criminal record, physical or mental health) from you. If it is necessary for us to collect sensitive information, we will obtain your explicit consent to collect and use such information.

Sensitive and special category information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply (e.g. where required by law).

In some instances, it may be necessary to collect personal, sensitive and special categories of information from clients that relates to their employees, members, customers, third parties their spouse and dependants to provide professional services. In those circumstances we rely on clients to only provide us with information that they have handled in accordance with the Privacy Act, including obtaining any necessary consent for Vlassis & Co to collect, use and disclose that information.

We may also collect personal information from suppliers, contractors and third party service providers to operate our business such as contact details and account details.

We may also collect personal information that is publicly available.

As a provider of accounting, business and taxation advisory services we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you.

Anonymity and Pseudonymity

Although the Privacy Act makes provision for people to remain anonymous or use pseudonyms we believe it is impractical for us to deliver our services to you if you wish to do this.

Methods of Collection

When we collect, hold, use and disclose personal or sensitive information, it must be done through lawful and fair means. Consent must be obtained to collect, hold, use and disclose personal information. We are not required to obtain your consent to collect, hold, use or disclose your personal or sensitive information if the collection is required or authorised by or under an Australian law or a court/tribunal order. There are other exceptions to the requirement of obtaining your consent in accordance with the Australian Privacy Principles. If you would like more information on these requirements, please contact us.

Vlassis & Co use a variety of formats for the collection of personal and sensitive information, for example:

- Receipt of emails, letters and other correspondence
- Telephone calls
- Appointments in person
- Publicly available records
- Through a client's personal representative
- Through use of our website, such as online enquiry forms

In every circumstance we will attempt to obtain personal and sensitive information directly from you.

Where we collect information about you other than directly from you we will advise you of this fact and provide any other information to you about that collection as is determined relevant in the circumstances and in light of sub-clauses 5.1 and 5.2 or the APPs.

Purpose for which Vlassis & Co collects, uses and discloses personal information

We only collect, hold, use and disclose personal information which is reasonably necessary to ensure that we can provide you with the products and services that are appropriate to your needs.

Generally, we collect, use and hold your personal information for purposes such as:

- to provide professional services to you or someone else you know
- to provide accounting services and solutions through technology
- to provide you with information and marketing material about other services that may be of interest to you
- to respond to requests and to maintain contact with you
- to provide you with information relevant to you
- to keep you informed of our services and industry developments
- to facilitate our internal business operations, including the fulfilment of any legal or regulatory requirements
- for administrative purposes
- to analyse our services and client needs with a view to improving those services
- for engagement of service providers, contractors or suppliers relating to the operation of our business
- for other purposes related to the performance of our business functions and activities as Accountants

Dealing with Unsolicited Personal Information

If we determine that we have obtained unsolicited personal information from you (i.e. information we don't actually need in order to deliver our services to you) we will contact you and return it or otherwise remove it from our records as soon as is practicable.

Disclosure

In the delivery of professional services, we may disclose personal, sensitive and special categories of information to other organisations where they are providing related services. Where this is to occur, and where possible, we may seek prior approval to do so.

Vlassis & Co may also be required to disclose personal and sensitive information to law enforcement, regulatory, or other government agencies, or to other third parties, to comply with legal or regulatory obligations or requests.

It may be necessary, in certain limited situations, in order to perform our services to send your personal information to recipients such as third party software providers who outsource elements of their services to external service providers outside of Australia, in the United States, Singapore, India, the Philippines, New Zealand and other countries. In this case we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information. If we form the view that they are not able to treat client personal information in this way we will seek an alternative service provider.

Information provided to third parties will be dealt with in accordance with that entity's privacy policy.

If we use or disclose your personal information for any purpose other than the primary purpose of its collection (or any secondary purpose you have expressly consented to) we will advise you as soon as practicable.

Adoption, Use or Disclosure of Government Related Identifiers

We won't use any Government related identifier as our own identifier of you unless it is necessary for us to deliver our services to you and in doing so we need to liaise or communicate with a Government Department or agency that requires us to use a Government related identifier.

Security

Safeguarding the privacy of your information is important to us. We hold personal information in a combination of secure computer storage facilities and paper-based files.

Vlassis & Co have in place reasonable commercial standards of technology and operational security to protect all information provided from misuse, unauthorized access, disclosure, alteration, or destruction for example by use of physical security and restricted access to electronic records, firewalls, the use of encryption, passwords and digital certificates.

Our employees are required to respect the confidentiality of personal information and the privacy of individuals, and privacy and data protection training is undertaken. All employees are required to read this policy and understand their obligations regarding personal information.

If you have any call to complaint about our treatment of your personal information you can contact us or the Privacy regulator directly – they are accessible here: www.oaic.gov.au

Cloud Computing Services

Vlassis & Co uses some cloud-based computer services for its own internal use and for some client service functions. Prior to Vlassis & Co utilising any cloud-based software programs, we conduct a thorough due diligence review of the providers, including who they are, what and how they provide their services, and how and where data is stored, protected and backed up in order to reasonably ensure they have the appropriate privacy policies to manage those risks.

Where Vlassis & Co directly engages those cloud computing service providers we are then covered under the respective third party's own privacy policy.

Direct Marketing

We do not disclose our clients' personal information to third parties for the purpose of research or marketing. We may however use your personal information to guide our own marketing communications. You may tell us at any time that you do not wish to receive any further direct marketing materials, whereupon we will stop sending you such materials. In accordance with the Spam Act, should you wish to unsubscribe from commercial electronic messages from us, you may do so at any time through the "unsubscribe" facility on that type of electronic message. If you do not unsubscribe, we will continue to send you information by electronic message and may also use messaging methods other than email.

Access to Personal Information

You may access your personal, sensitive and special categories of information, which we hold, and seek to correct that information where necessary. Your access to this information is subject to the exceptions set out in the Privacy Act.

These exceptions would include where:

- it is a frivolous or vexatious request
- information relates to a commercially sensitive decision-making process
- access is unlawful
- information would prejudice enforcement activities relating to criminal activities and other breaches of law, or
- denial of access is required or authorised by or under law.

If access is denied we will explain the reason why it is denied.

Correction of Personal Information

We are happy to rectify any personal information we hold about you should you (or we) consider our records to be inaccurate.

Keeping personal information current

If you believe that any personal information Vlassis & Co has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact Vlassis & Co immediately and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act.

Updates to our Privacy Policy

We are constantly reviewing our statements and policies in order to keep up to date with relevant legislation and client expectations. Consequently, this policy may be amended from time to time as the need arises. The latest version will always be available on our website vlassis@vlassisco.com.au, and upon request.

Contact

If you have any questions about this Privacy Policy, please contact:

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