



POP & Co

PRIVACY POLICY

POP & Co. takes the privacy of its client's personal information seriously. We are committed to safeguarding the privacy of our users, in accordance with the Australian Privacy Principles in the Privacy Act 1988, while providing a personalised and valuable service. This Privacy Policy Statement explains the data processing practices of POP & Co.

This policy outlines the obligations a POP & Co Team Member has in managing the personal information we hold about our clients, potential clients, contractors and others. 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.

PERSONAL INFORMATION COLLECTED

As an outsourcing provider it may be necessary, and in some cases be a legislative and regulatory requirement, for us to collect and hold detailed personal information.

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



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HOW WE USE PERSONAL INFORMATION

POP & CO acknowledges that your personal information is highly confidential and to this end the information collected by us will only be used for the purpose in which it was collected unless you have consented to it being used for another purpose or if the secondary purpose for which the information is being used or disclosed is related to the primary purpose and you would reasonably expect such use or disclosure. This may include to:

- ◆ Provide you with products and services during the usual course of our business activities
- ◆ Administer our business activities (including invoicing, account management, accounts payable and receivable)
- ◆ Provide you with information about our products and services, invite you to events or distribute articles or publications
- ◆ Providing a personalised service
- ◆ Communicate with you by a variety of measures including, but not limited to, by telephone, email, SMS or mail
- ◆ Investigate any complaints.

You have the right not to provide information that can identify you. If, however, you withhold your personal information, it may not be possible for us to provide you with our products and services, or alternatively, may affect the adequacy or appropriateness of advice or services provided.

HOW WE COLLECT PERSONAL INFORMATION

POP & CO may collect personal information from you in a variety of ways, including when you interact with us electronically or in person. This includes, but is not limited to, when you provide feedback, when you provide information about your personal or business affairs, change your content or email preference(s), provide financial or credit card information, through the use of accounting software systems and registration forms.

Sometimes you may provide us with someone else's personal information, e.g. other members of your family group. You must not provide that information to us unless you have their consent to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

DISCLOSURE OF PERSONAL INFORMATION



In providing our services we may need to disclose personal information to a third party. This will be done to the extent that it is permitted by law and set out in this Policy.

Examples of the types of third parties we may disclose personal information to include:

- ◆ Companies or individuals contracted to assist us in providing services or who perform functions on our behalf (such as mailing houses, specialist consultants, barristers and solicitors, contractors or temporary employees to handle peak period workloads, information technology service providers, superannuation fund trustees, insurance providers, fund managers, market research organisations and other product providers)
- ◆ Courts, tribunals and regulatory authorities, as required or authorised by law and in accordance with the Code of Ethics for Professional Accountants
- ◆ Auditors or compliance officers, as required by Law or Professional Associations
- ◆ Anyone else to whom you consent, such as banks, accountants and other financial institutions

If we are required by law to disclose information about you or your organisation, we must co-operate fully. However, where it is possible and lawful for us to do so, we will advise you that the information has been disclosed.

Security of Personal Information

POP & CO is committed to ensuring that the information you provide to us is stored securely. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure. Our employees are required to respect the confidentiality of personal information and the privacy of individuals, and privacy and data protection training is undertaken. As part of that training, all employees are required to read this policy and understand their obligations in regard to personal information.

Each year all employees are required to acknowledge that they have complied with all aspects of this policy and kept themselves informed of any changes to this policy. The transmission and exchange of information made by you is done so at your own risk. We cannot guarantee the security of any information that you transmit to us or receive from us. Although we take measures to safeguard against unauthorised disclosures of information, we cannot assure you that personal information that we collect will not be disclosed in a manner that is inconsistent with this Privacy Policy.

Retention of Personal Information

We will retain your personal information only if necessary, to fulfil the purpose for which it was collected, as required by law and the Australian Privacy Principles, or in accordance with our documentation retention policies.

