

Privacy Policy

When you trust us with your personal information, you expect us to protect it and keep it safe.

We take this responsibility seriously and we are bound by the *Privacy Act 1988* (Cth) ('Privacy Act'). We will protect your personal information in accordance with the *Australian Privacy Principles*. These principles govern how we can collect, use, hold and disclose your personal information, as well as ensuring the quality and security of your personal information.

If you would like more information about how we protect your privacy, please contact us.

About this policy

This Privacy Policy explains how we manage your personal information. We may provide more details on how we manage your personal information when we collect your personal information.

What is personal information?

Personal information includes any information or opinion, about an identified individual or an individual who can be reasonably identified from their information.

Some examples of personal information may include your:

- Name;
- Mailing or residential address details;
- Contact details such as telephone numbers, email address, social media platform user name;
- Government issued identifiers such as Tax File Number, Medicare number or Driver's License number;
- Bank account and credit card details;
- Audio recording; and
- Sensitive information such as information relating to your health, racial or ethnic origin.

The information that we seek to collect about you will depend on the services that we provide.

If you do not allow us to collect all of the information we request, we may not be able assist you in providing the services or advice you have requested. Where you provide limited information, we will make you aware of any limitations or risks of such providing.

What kinds of personal information do we collect and hold?

We collect and hold personal information from clients, customers, employees, contractors and other individuals necessary for business purposes. The main type of information we generally collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- Other contact details such as social media handles;
- Health information where permitted;
- Your location or activity including IP address;

Credit information such as details relating to credit history, credit capacity, and eligibility for credit ('credit worthiness');

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- Investment details; and
- Payroll details, taxation and tax residency details (including tax file number), job titles and other accounting and financial services related information.

We collect most information directly from you when we deal with you. The personal information we collect may be provided in forms filled out by you, face to face meetings, email messages, telephone conversations or by third parties.

Third Parties

We may also collect information about you that is:

- Publicly available (for example in public registers or open media);
- From your representatives (including your financial or legal adviser, mortgage broker, executor, administrator, guardian, trustee, or attorney); and
- Your employer
- Other organisations, who jointly with us, provide products or services to you
- Commercial information service providers, such as companies that provide fraud prevention reports
- Insurers, re-insurers and health care providers.

If you contact us, a record of that contact may be kept. Where practicable, we will give you the option of interacting with us anonymously. On all occasions, your information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

Sensitive Information

The Privacy Act protects your sensitive Information – such as information about your religion, ethnicity, or health. Unless required by law, we will only collect sensitive information with your consent.

We also collect information about you when you use our services or deal with us in some way.

Why do we collect, hold, use and disclose personal information?

The main reason we collect, use, hold and disclose personal information is to provide you with our services. This includes:

- Providing our services
- Assisting you with your questions and requests
- Assisting you with completion of forms
- Management of our services, such as invoicing or client surveys.

We may also use your information to comply with legislative or regulatory requirements in any jurisdiction, prevent fraud, crime or other activity that may cause harm in relation to our products or services and to help us run our business.

We may also use your information to internally help us improve our services with you.

What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- Certain identification information about you as outlined in the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and Anti-Money Laundering and Counter-Terrorism Financing Rules Instrument 2007 (No. 1)
- Your Tax File Number, if you choose to provide it as specified in the Income Tax Assessment Act

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1936 (Cth)

- Certain information in relation to your application if you have applied for insurance as required by the Insurance Contracts Act 1984 (Cth).

How do we hold personal information?

Your personal information will be stored electronically in secure data centres which are owned by us or by external service providers bound by the Australian Privacy Principles. Some information we hold about you will be stored in paper files. We use a range of physical and electronic security measures to protect the security of the personal information we hold. For example:

- Access to information systems is controlled through identity and access management
- Employees are bound by internal information security policies and are required to keep information secure
- All employees are required to complete training about information security
- We regularly monitor and review our compliance with internal policies and industry best practice.

We take reasonable steps to destroy your personal information when it is no longer needed for any purpose permitted under the Privacy Act. This requirement does not apply if we are required or authorised by law to keep it.

Who do we disclose your personal information to, and why?

We may provide personal information about our clients to organisations inside the Spinell Group of companies ('Spinell Group'). Staff of the Spinell Group will have access to your personal information for use in the provision of services provided by them.

We disclose your personal information for the purpose for which we collect it. That is, generally, we will only disclose your personal information for the purpose carrying out our business functions and activities. This may include disclosing your personal information to third parties engaged to perform administrative or other business management services. This disclosure is always on a confidential basis or otherwise in accordance with law. We may also disclose your personal information with your consent or if disclosure is required or authorised by law.

Spinell Group may also need to disclose your personal information to one or more of the third party organisations which may include (but is not limited to):

- A client's personal financial adviser and their service provider;
- Individuals or organisations that are your representatives including a client's legal advisers;
- Authorised representatives of the Spinell Financial Services who sell products or services on our behalf;
- Insurance, investment, superannuation and managed funds organisations, and their advisers and service provider;
- Fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- Government or regulatory bodies (including the Australian Securities and Investment Commission, AUSTRAC and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities);
- Off-site third-party organisations providing storage and archiving services; and
- Other third parties (including Joint Venture partners) as required by us in performing the functions and activities of the service.
- Your representatives (including your legal adviser, accountant, mortgage broker, property valuer,

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guarantors, (including prospective) family members, executor, administrator, guardian, trustee, or attorney)

- Any government and regulatory bodies required by law, to prevent fraud or other misconduct
- IT service providers
- External dispute resolution schemes
- 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, which may include the assets of personal information.
- Regulatory bodies, government agencies and law enforcement bodies in any jurisdiction.

We may also disclose your personal information to others outside the Spinell Group where:

- We are required or authorised by law or where we have a public duty to do so
- You may have expressly consented to the disclosure or the consent may be reasonably inferred from the circumstances
- We are otherwise permitted to disclose the information under the Privacy Act.

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required, authorised by law or unless you have voluntarily consented to disclose this information to any third party to complete services on your behalf.

Do we disclose personal information overseas?

We may store your information in cloud or other types of networked or electronic systems. As electronic or networked systems can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held.

We may disclose your personal information overseas as we engage the services of these providers, who may be based in Australia or overseas, and have all or part of their operations overseas, store data overseas, access services overseas or utilise third parties who are overseas.

Overseas locations of organisations, data centres and third parties may include, but are not limited to, USA, member states of the European Union, United Kingdom, Taiwan, Singapore, Malaysia, Hong Kong, Japan, South Korea, Philippines, South Africa, New Zealand, Canada, Brazil, Chile, United Arab Emirates.

The Spinell Group maintains an Outsourcing Policy when selecting service providers to ensure quality providers are selected and that their privacy policy aligns with our philosophy of protecting our clients' privacy. We generally require any external organisations with whom we share your personal information to comply with the Australian Privacy Principles.

We provide a list below of the third party service providers and third party applications we may use or recommend the use of, including links to their privacy policy and where available, their data centre locations.

- Google G-Suite (Cloud File Storage, Emails, Calendars, Online Meetings and Business Applications)
[Link to Privacy Policy](#)
[Link to Data Centre Locations](#)
- Acuity Scheduling (Online Booking System & Calender)
[Link to Privacy Policy](#)
- Microsoft OneDrive (Cloud File Storage and Business Applications)

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[Link to Privacy Statement](#)

[Link to Data Centre Locations](#)

- Adobe Acrobat Documents (Electronic Signature and Document Storage Application)
[Link to Privacy Policy](#)
- Morningstar (Portfolio Research Tool)
[Link to Privacy Policy](#)
- MYOB (Accounting Package)
[Link to Privacy Policy](#)
- Xero (Accounting Package)
[Link to Privacy Policy](#)
- Sage Handisoft (Accounting Package)
[Link to Privacy Policy](#)
- BGL (SMSF Administration Application)
[Link to Privacy Policy](#)
- Dropbox (Document Storage Application)
[Link to Privacy Policy](#)
- Mailchimp (Automated Marketing & Email Platform)
[Link to Privacy Policy](#)
- Zoom (Online Meeting Assistant)
[Link to Privacy Policy](#)

Overseas organisations may be required to disclose information we share with them under a foreign law.

In the course of doing business with you, we may disclose some of your personal information to overseas recipients. However, we will only do so where:

- It is necessary to complete the transaction you have entered into; or
- We believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- It is otherwise permitted by law.

We may use outsourced providers who may disclose your personal information to recipients located outside Australia who are part of their corporate group or as part of their operations when they deliver their services to us. We can make available a list of our outsourced providers on request if you would like to understand their individual privacy statements. We only enter agreements with outsourced providers whose are have an Australian presence and who can agree to appropriate contractual controls to ensure their compliance with Australian Privacy Act law.

Do we use or disclose personal information for marketing?

We may use your personal information to offer you products and services we believe may interest you. We may send you direct marketing communications such as offers, updates, events, articles or newsletters. We will always give you the option of electing not to receive any of these communications in the future by notifying us or unsubscribing at any time.

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Do we collect personal information electronically?

We will collect information from you electronically, for instance through internet browsing, mobile or tablet applications.

Each time you visit our website, we collect information about your use of the website, which may include the following:

- The date and time of visits
- Which pages are viewed
- How users navigate through the site and interact with pages (including fields completed in forms and applications completed)
- Location information about users
- Information about the device used to visit our website
- IP addresses.

We use technology called cookies when you visit our site. Cookies are small pieces of information stored on your hard drive or in memory. They can record information about your visit to the site, allowing it to remember you the next time you visit and provide a more meaningful experience.

One of the reasons for using cookies is to offer you increased security. The cookies we send to your computer cannot read your hard drive, obtain any information from your browser or command your computer to perform any action. They are designed so that they cannot be sent or retrieved by any another website.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platforms that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

Accuracy, access to and correction of personal information

We will make every effort to ensure that the personal information we collect is accurate and complete. However, we are reliant on you informing us if your personal details change.

You can request access to the personal information we hold about you. You can also ask for corrections to be made. To do so, please contact us.

There is no fee payable for updating or correcting your personal information. Should you request access to your personal information, a reasonable cost may be charged. This charge covers such things as locating the information and supplying it to you.

There are some circumstances in which we are not required to give you access to your personal information. If we refuse to give, you access to or to correct your personal information we will give you a notice explaining our reasons, except where it would be unreasonable to do so.

If we refuse your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

If we refuse your request to access or correct your personal information, we will also provide you with information on how you can complain about the refusal.

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How long do we keep your personal information?

We will keep your personal information for as long as you continue to be client of Spinell Group.

We also generally retain your personal information for at least seven years after you stop being a client in order to comply with our legal obligations, for example demonstrating our compliance with relevant financial service laws and responding to any questions or complaints may have you.

European Union General Data Protection Regulation (GDPR)

If you are a resident of or a business 'established' in a country that is a member of the European Union Economic Area (the EU and Norway, Lichtenstein and Iceland), you are entitled to additional protections provided by the GDPR, other than the protections already afforded to you under the Privacy Act.

In certain circumstances, this may include, but is not limited to, the right to:

- Have your personal information erased
- Access your personal information in an electronic and portable format
- Restrict, object or withdraw your consent to the processing of your personal information

If you require more information about your eligibility to and or these rights, please let me know.

Resolving your privacy concerns and complaints – your rights

If you are concerned about how your personal information is being handled or if you have a complaint about a breach of the *Australian Privacy Principles*, please contact us.

We are committed to resolving complaints within a fair and reasonable timeframe. Wherever possible, complaints will be resolved promptly at first point of contacts. Where this is not possible, we aim to resolve complaints within five business days.

If your complaint exceeds five business days, we will contact you with a status report and expected resolution date.

If you are unhappy with our response, there are other bodies you can go to including the Australian Financial Complaints Authority and the Office of the Australian Information Commissioner.

Australian Financial Complaints Authority

The Australian Complaints Authority (AFCA) provides fair and independent financial services complaint resolution that is free to consumers.

ACFA can be contacted at:

Website: www.afca.org.au

Email: info@afca.org.au

Phone: 1800 931 678 (free call)

In writing to: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001

Office of the Australian Information Commissioner

Under the Privacy Act you may complain to the Office of the Australian Information Commissioner about the way we handle your personal information.

The Commissioner can be contacted at:

GPO Box 5218

Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au www.oaic.gov.au

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Contact us

Our Privacy Officer can also be contacted in relation concerned by writing to:

Attention: Privacy Officer
Financial Adviser Network
14 Belmont St
Belmont VIC 3216

You can also call or visit our offices in person:

Phone: 03 5229 1290
In-person: 14 Belmont St, Belmont VIC 3216

Changes to the Privacy Policy

We may change the way we handle personal information from time to time for any reason. If we do so, we will update this Privacy Policy and we encourage you to review this policy periodically. While we seek to maintain the currency of the third party links in this policy, third party privacy policies may change prior to our own review of our policy. We therefore we encourage you to check any link is the most up to date privacy policy from any of our listed third party providers.

Providing us information about your family members

Please make anyone in which you have provided their personal information to us aware of this Privacy Policy. Where you have provided personal information about children under the age of 16, as their parent or guardian in this capacity you have given your consent for us to hold this information.

Client consent

By asking us to assist with your financial needs, you consent to the collection and use of your personal information you have provided us with for the purposes described in this policy.

Meaning of words

We, us or **our** means:

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