

# Australian Privacy Principles (APP) Privacy Policy

***You must make your client aware of the matters contained in this statement in so far as they relate to the personal information we collect about them.***

Personal information you provide to us about you or your client is collected by Company Dynamics Pty Ltd ACN 058 086 169. Company Dynamics Pty Ltd ACN 058 086 169 can be contacted at 4/4 Gladstone Road, Castle Hill NSW 2154 or Locked Bag 9009, Castle Hill NSW 1765. Phone: (02) 9842 5777 Fax: (02) 9634 4985, Email: info@smartcorp.com.au.

You (or your client in the case of information collected by us about them) have a right to request access to your (or their) personal information and to request its correction. You (or they) can access the personal information we hold about you (or them) by contacting us at the address above. Requests should be addressed to **The General Manager** and will be responded to within 30 days.

When you provide personal information to us about you or your client we rely on that information being accurate, complete and up to date when we use or disclose it. If you (or your client) advise us that the personal information we hold about you (or them) is not accurate, complete, up to date and relevant or is misleading, we will correct our records. If we correct personal information about you (or them) that has previously been disclosed to another entity, such as the Australian Securities and Investments Commission (ASIC) and you request us to notify the other entity, we will do so unless it is impracticable or unlawful.

If you (or your client) believe that we have breached an Australian Privacy Principle you can lodge a complaint with us. The complaint should be made in writing (as required by s40(1A) of the Privacy Act) to us at the address above. We will respond within 30 days. If you are not satisfied with the manner in which your complaint is handled by us you may then refer it to the Office of the Australian Information Commissioner (OAIC).

## **The kinds of personal information we collect and hold:**

- (i) **About your client:-** full names, residential addresses and dates and places of birth.
- (ii) **About you:-** your contact details eg your name, your firm's name and address, phone and fax numbers and email address, details of the professional accounting association to which you belong or if you are not a member of an association, your residential address.

## **How we collect and hold personal information:**

Personal information we collect about you and your client is provided directly by you when you complete our service order forms or other service requests, either via our website or by hard copy.

Personal information is stored in a secure database provided by a reputable Australian based internet service provider. We do not combine information provided to us with information from any other sources.

When you browse our website, our internet service provider logs the following information for statistical purposes:

- Your server address
- Your top level domain name (eg .au)

- Date and time of your visit
- The type of browser used
- Pages viewed

Users and their browsing activities are only identified for the purpose of website troubleshooting or to provide technical support.

You should note that there are security risks in transmitting and receiving information via the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information via our website, there are other ways in which you can provide this information to us. Please contact our customer service staff for details.

### **The purposes for which we collect, hold and use personal information:**

#### **(i) About your client:-**

- For the purpose for which it was collected - ie to provide business services requested by you eg company registrations, superannuation funds, company deregistrations. We will not use it for any other purpose.

#### **(ii) About you:-**

- To set up your trading account with us.
- To administer your trading account with us to keep your details accurate, complete and up to date.
- To communicate with you.
- To send documentation and electronic files to you in relation to services requested by you.
- To process your payments of our invoices.
- To carry out voluntary surveys for feedback. Before collecting the survey results, we will advise you of the purpose of the survey.
- To market services offered by us that may be of interest to you, unless you inform us not to do so.
- To provide website technical support.

The law does not require us to collect personal information about you or your client; however, if the minimum information requested on our order forms is not provided, we will not be able to supply our services to you.

### **When we may disclose personal information:**

**(i) About your client:-** We will not disclose personal information about your client unless it is necessary for a service you have requested (eg to the Australian Securities and Investments Commission) or unless such disclosure is required or authorised by or under an Australian law or a court/tribunal (APP 6.2(b)).

**(ii) About you:-** We will not disclose personal information about you to any organisation except with your prior authorisation (eg to give a credit reference) or unless it is necessary for a service you have requested or unless such disclosure is required or authorised by or under an Australian law or a court/tribunal (APP 6.2(b)).

Examples of where we may be required or authorised by law to use or disclose personal information include:-

Where a warrant, order or notice issued by a court requires us to provide information, or produce records or documents that are held by us; or where we are subject to a statutory requirement to report certain matters to an agency or enforcement body, for example, specific financial transactions.

We do not disclose any personal information about you or your client to any overseas recipient.

## **The organisations to which we usually disclose personal information:**

(i) **About your client:-** If you have requested a company registration, the Australian Securities and Investments Commission requires the names, addresses and dates and places of birth of the officeholders and members of the proposed company. We will also disclose personal information about your client to Company Dynamics Pty Ltd's consulting solicitor when this is necessary to process an order for a service requested by you (eg a superannuation fund or a discretionary trust).

(ii) **About you:-** We will disclose personal information about you to Company Dynamics Pty Ltd's consulting solicitor when this is necessary to process an order for a service requested by you. We will also disclose your name, delivery address and contact phone number to the courier organisations we use, to enable documents to be delivered to you.

Our staff are trained to treat client information with the utmost confidentiality. All personal information we hold about you and your client is protected from misuse, interference and loss and from unauthorised access, modification or disclosure.

You can obtain further information about the Privacy Act from the Office of the Australian Information Commissioner:- [www.oaic.gov.au](http://www.oaic.gov.au)