

PRIVACY POLICY

W Campbell & Associates (WCA) is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth) (Privacy Act). This policy sets out how WCA handles personal information.

This privacy policy does not apply to personal information collected by WCA that is exempted under the Privacy Act, for example employee records.

Our privacy policy will be reviewed regularly to take account of changes in legislation, technology, and our operations and practices. We aim to ensure the policy is appropriate to the changing environment. We will inform you of any changes we make to this privacy policy as necessary.

Our privacy policy is based on openness about how we use and protect your information.

1. Purposes for which W Campbell & Associates collects, holds, uses and discloses personal information

We only collect, hold, use and disclose personal information which is reasonably necessary to ensure that we are able to provide you with the products and services that are appropriate to your needs. We will outline to you when you engage our services the purposes for which we will collect, hold, use and disclose your personal information.

We will never sell your personal information.

Your personal information may be disclosed to:

- Anyone authorised by you
- As specified by law
- Any Third Party who we engage to provide to services to you such as auditors & actuaries. We will always request that such third parties deal with and protect your personal information in accordance with the APP's and the Privacy Act.

2. Kinds of personal information W Campbell & Associates collects

Due to the nature of the products and services we provide, and the requirements of legislation and regulations, we ask for a range of personal information from our customers.

The types of personal information we may collect can include details such as:

- Names, employment titles, contact details
- Date of birth and gender
- Information in identification documents (e.g. passport, driver's licence)
- Tax file numbers and other government related identifiers
- Assets and liabilities
- Educational qualifications and employment history

- Personal income
- Visa and work permit status
- Bank account details
- Shareholdings and details of investments
- Superannuation details
- Tax and financial statements
- Information regarding insurance
- Personal information about your spouse and dependents

You have a right to refuse to provide us with your personal information or to anonymity or the use of a pseudonym. However, if you do refuse to provide such information, or request the use of anonymity or a pseudonym we may be unable to complete or fulfil the purpose for which such information was collected, including providing you, our clients, with the services we were engaged to perform.

3. Sensitive personal information

Unless specifically necessary for us to provide services to you and you have expressly consented to us doing so, we will not usually seek sensitive information from you or about you. Sensitive information can include things like your religion, ethnicity, criminal history, medical condition and sexual preferences.

4. Collection, holding, using and disclosing of personal information

(a) Collection – General

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 of, 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 look at the following: <https://www.oaic.gov.au/privacy-law/privacy-act/>

(b) Methods of collection

W Campbell & Associates use a variety of formats for the collection of personal and sensitive information. These include:

- Requiring clients to complete a Client Profile or other forms
- Receipt of emails, letters and other correspondence
- Telephone calls
- Appointments in person
- Publicly available records
- Through a customer's personal representative

In every circumstance we will attempt to obtain such personal and sensitive information directly from you. If that is unreasonable or impracticable, we will attempt to obtain such information from other sources in accordance with Clause 3(a) above.

(c) Collection of someone else's personal information

You should only provide us with someone else's personal information where you have their express consent to do so and it is for the purpose of us providing services to you. Matters in this policy should be communicated to any person whose information you collect and provide to us. In providing such information, you agree that you have obtained the relevant consent and are authorised to do so.

(d) Unsolicited personal information

There may be circumstances where we are provided with personal information, which we did not actively seek. An example may be misdirected mail, or an excess of documents provided to us by clients.

In such situations, we will make a determination on whether we could have obtained the information lawfully in accordance with the APPs. If the information was not lawfully obtained it will be destroyed or de-identified. We will try to notify the relevant person, whose information has been mistakenly received, if this situation arises.

5. Security of personal information

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, and take steps to protect the personal information we hold from misuse, loss, interference, unauthorised access, modification or disclosure.

WCA trains its employees carefully on handling personal information and confidentiality of such information.

We do not use overseas providers and any cloud based providers that we use, we ensure that their servers are located in Australia.

Once we have no purpose for holding your personal information, we will take all reasonable steps to destroy or de-identify the information.

6. Access to personal information

You have the right to access any personal information regarding you that WCA holds.

Such requests should be made in writing to us. We will respond to your request within a reasonable amount of time.

WCA may charge a fee to cover the cost of locating, retrieving, reviewing and copying any material requested.

7. Correction of personal information

WCA endeavours to ensure that the personal information it holds is accurate and up-to-date.

You are able to make a request to correct the information by telephoning or emailing us with your corrected information.

8. How long we will hold your personal information

We will hold your personal information for as long as is required to fulfil the purpose(s) for which it was collected, or as required by law.

9. How to make a complaint

If you consider that any action of WCA breaches this policy or the Australian Privacy Principles, you are able to make a complaint. Once we have received your complaint, it will be assessed and acted upon within a reasonable time.

To make a complaint please contact Wendy Campbell. If you are not satisfied with our response to your complaint, you may contact the Office of the Privacy Commissioner.

10. Amending this privacy policy

This policy may be amended from time to time. The revised Policy will take effect when it is uploaded on our Website. This privacy policy was created February 2019.

11. How to contact us

You may request further information about the way we manage your personal information by emailing us on wendy@wcampbell.com.au, calling us on (08) 9228 2558 or writing to PO Box 714, Mount Lawley WA 6929.