

Privacy Policy

1. Protecting Your Privacy

1.1 The *Privacy Act 1988* (“**Privacy Act**”) provides extensive regulations about the collection, storage and use of information relating to individuals. It also contains some specific exemptions for organisations that have a need to collect, store and use information about individuals, one of which is to exempt the “acts and practices of employers in relation to employee records.”

1.2 To be exempt, an act or practice relating to the employee record must be directly related to the employment relationship. This means that acts or practices of an employer that are outside the scope of the employment relationship are not exempt. For example, Rowe Partners could not sell details of employees to another organisation.

The act or practice must also be directly related to a current or former employment relationship. This does not cover future employment relationships. This means that personal information collected from prospective employees who are subsequently not employed, such as unsuccessful job applicants, will not be covered by the employee records exemption.

Once an employment relationship is formed with an individual, the records Rowe Partners holds relating to that individual's pre-employment checks then become exempt.

Rowe Partners is also covered by the Australian Privacy Principles (“**APPs**”), as set out in the Privacy Act, which cover all aspects of dealing with personal and sensitive information, not only those relating to employees.

Rowe Partners recognises the importance of protecting personal information, which it may be required to collect from individuals who become associated with its business. The purpose of this privacy policy is to ensure that any individual who provides information to Rowe Partners is protected according to the requirements of the Privacy Act.

1.3 For the purpose of this privacy policy, “information” is described as:

1.3.1 “**personal information**” means information relating to an individual, including an opinion, which may be provided to Rowe Partners as part of its usual business requirements either in material form or not, and whether true or not. Such information may personally identify an individual or make the person's identity reasonably apparent;

1.3.2 “**sensitive information**” means information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual practices, criminal record or health information.

1.4 All other words defined in the Privacy Act have the same meaning when used in this policy.

1.5 Rowe Partners takes its obligations under the Privacy Act seriously, and as such, will take all reasonable steps in order to comply with the Act and protect the privacy of personal information that it holds.

2 Procedure

2.1 Personal Information Rowe Partners Collects and Holds

- 2.2.1 Rowe Partners collects personal information such as:
- your name, current address details, previous address details, telephone number, email address;
 - date of birth, gender, and marital status;
 - government identifiers such as your tax file number;
 - financial information;
 - employee and employment details and titles; and
 - sensitive information about you including your professional affiliations.
- 2.2.2 Rowe Partners will not usually seek to collect sensitive information from you except where it is necessary to provide our services to you. If it is necessary for us to collect sensitive information, we will obtain your consent to collect and use such information.
- 2.2.3 Rowe Partners also collects information about your accounts and transactions with us.
- 2.2.4 We may also collect information about you when you visit our website. Please refer to the website section of this policy for further details.
- 2.2.5 If there is another person named, for example additional company directors or your spouse, in accordance with the provision of our services, you may need to provide their personal information and you warrant that the other person has consented to the collection of their personal information for the purpose it is being collected.

2.3 How We Collect Personal Information

- 2.3.1 Rowe Partners collects information in a variety of ways. Mainly we collect information from you when you knowingly provide it by telephone, in person, or in documentation.
- 2.3.2 We also collect information when you make an enquiry of us.

2.4 Use of Personal Information

- 2.4.1 Rowe Partners may require the collection of personal information from individuals to enable it to provide accounting and business advisory services to clients and payroll services to employees. The reasons for the collection of personal information include, but are not limited to, taxation and other legal requirements.
- 2.4.2 Rowe Partners acknowledges that there is no obligation for an individual to provide personal information. However, if an individual chooses not to provide Rowe Partners with personal details, it may not be able to provide the individual with a full range of services or may reduce the ability of directly servicing the individual's organisation.
- 2.4.3 Personal information is also collected by Rowe Partners for the purpose of selling and marketing of its products and extended range of services. Rowe Partners may also use such information to apply customer/member satisfaction surveys and events, such as 'loyalty' programs.
- 2.4.4 Your email address may be used for direct marketing purposes by Rowe Partners. You may choose to "opt-out" of receiving marketing material by sending a reply email stating that you wish to unsubscribe from the mailing list. Rowe Partners will not charge you any additional cost or in any way disadvantage you for choosing to "opt-out" of receiving marketing material.

2.5 Security, Storage and Retention of Personal Information

- 2.5.1 Rowe Partners will take all reasonable steps to protect the security of the personal information that it holds. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.
- 2.5.2 Where information held by Rowe Partners is no longer required to be held, and the retention is not required by law, then Rowe Partners will destroy such personal information by secure means.
- 2.5.3 This PI collected may be stored via cloud based third party providers, some of whom may be based overseas. The Cloud Service provider's role is limited to providing information storage services only.
- 2.5.4 Where an outsourced service requires the disclosure of PI to an overseas recipient a consequence of your consent is that Rowe Partners will be required to take reasonable steps to ensure that the Australian Privacy Principles are complied with by the overseas recipients of the Personal Information.
- 2.5.5 **Cloud Based Third Party Recipients used by Rowe Partners:**
- **XERO** - We utilise a cloud service provider Xero, to prepare your bookkeeping, payroll, BAS, financial statements and/or tax returns. The storage of your data through Xero is held on services located in the United States of America. Xero take seriously the protection of your data, you may read their Privacy Policy and what they do to protect your information at www.xero.com/au/about/terms/privacy
 - **FYI** - We also utilise a cloud service provider FYI, to store all documentation we receive and create relating to you and your business. The storage of your data through FYI is held on servers located in Australia. You can read their Privacy Policy at <https://fyidocs.com/privacy/>
 - **CLASS** - For our Self-Managed Superannuation Fund Clients, we utilise a cloud service provider Class, to prepare your financial statements. The storage of your data through Class is held on services located in Australia. You can read their Privacy Policy at: <https://www.class.com.au/wp-content/uploads/2019/03/Class.public.Privacy-Policy.Version-20190325.pdf>
 - **NOW INFINITY** - For the management of Corporate Compliance and ASIC affairs for clients, we utilise a cloud service provider, Now Infinity. The storage of your data through Class is held on services located in Australia. You can read their Privacy Policy at <https://www.class.com.au/nowinfinity-privacy-policy/>
 - **DEXT** - For the management of record keeping for some clients, we utilise a cloud service provider Dext.. You can read their Privacy Policy at <https://dext.com/uk/privacy-policy>
 - **MY PROSPERITY** - We utilise a cloud service provider My Prosperity, to store your Self-Managed Superannuation Fund records and for signing of documents. The personal information collected through My Prosperity is stored on servers in Australia. You can read their Privacy Policy at <https://www.myprosperity.com.au/privacy-policy-2/>
 - **SEAMLESS SMSF** - For our Self-Managed Superannuation Fund Clients, we utilise a third party provider for SMSF Audit requirements. The auditors utilise cloud services to store your Self Managed Superannuation Fund records. You can read their Privacy Policy at <https://www.seamless-smsf.com.au/company-policies/>
 - **ACCURIUM** - For our Self-Managed Superannuation Fund Clients, we utilise a third party provider for Actuarial certificates. You can read their Privacy Policy at <https://www.accurium.com.au/privacy-policy/>
 - **SEAMLSS** - For Client Onboarding, Identity verification and electronic signing for clients, we utilise a cloud service provider Seamlss. You can read their Privacy Policy at <https://seamlss.com.au/privacy/>
 - **ANNATURE** - For Client digital document signing, we utilise a cloud service provider Annature. You can read their Privacy Policy at <https://www.annature.com.au/privacy-policy>

2.6 Artificial Intelligence

- 2.6.1 We may, from time to time, use reputable third-party artificial intelligence ("AI") systems, such as Microsoft Copilot, to assist in providing the services to you.

- 2.6.2 Where appropriate, this may involve the use and disclosure of your confidential information, personal information and credit information (“**Information**”) through the AI system, which may be hosted within or outside Australia.
- 2.6.3 By entering into this Agreement, you agree that we may use and disclose your Information for these purposes. At all times, services provided to you under this Agreement will be done so competently and under our supervision and control.
- 2.6.4 We will take reasonable steps to ensure that any Information used in conjunction with an AI system remains confidential and private and is otherwise handled in accordance with this Agreement.

2.7 Disclosure of Personal Information

- 2.7.1 Rowe Partners may in the course of conducting their business provide your personal information to any of its subsidiaries, branches, franchises or legally related companies, agents, dealers or contractors. We may also provide your personal information to any government bodies, auditors or lawyers.
- 2.7.2 Rowe Partners may also disclose your personal information to third parties to meet the purpose for which it was submitted, if we have your consent to do so or otherwise when we are authorised by law; or if we are required by law to disclose the information.

2.8 Website

- 2.8.1 When you visit the Rowe Partners website, we or other agencies on our behalf and our internet service provider may monitor and make a record of your visit and log “clickstream data” for statistical purposes, such as your server’s IP address.
- 2.8.2 This policy is strictly limited to the collection, storage and use of personally identifiable information collected from our clients, in the course of business, and does not apply to any third parties. We have no control over the privacy practices or the content of any third party websites, and assume no liability for the privacy practices of these websites.
- 2.8.3 Links on the Rowe Partners’ website to external entities are not covered within this policy.

2.9 Access Rights and Contact Details

- 2.9.1 The Privacy Act provides the right to access and amend personal information held by Rowe Partners. The release of information is subject to some exceptions such as information relating to existing or any anticipated legal proceedings, together with exceptions provided by the Privacy Act.
- 2.9.2 A request will be responded to within a reasonable period after the request is made (usually 30 days) and will provide the information in the manner requested by the individual, if it is reasonable and practicable to do so.
- 2.9.3 Rowe Partners reserves the right to charge a nominal fee if required for the retrieval of information requested. No fee will be charged for making of the request or for correcting the personal information.
- 2.9.4 To protect your personal information, a request to access your personal information should be made in writing. All correspondence should be addressed to:
 - Mail: Rowe Partners
PO Box 2247
Port Augusta SA 5700
 - Email: admin@rowepartners.com.au
- 2.9.5 There may be limited circumstances where your request is refused or partially refused. If this occurs we will give you a written notice that sets out:
 - The reasons for the refusal, including the reasons why access cannot be granted in an alternative way (except where it would be unreasonable to provide those reasons);
 - How to make a complaint about the refusal;
 - Any other matter as prescribed by the regulations.
- 2.9.6 If your request is refused you have the option of submitting a statement associated with your personal information. For more information please email admin@rowepartners.com.au.
- 2.9.7 Amendment of personal information will be conducted upon written or verbal request from you. You can contact is on (08) 86419300 or by emailing admin@rowepartners.com.au to do so.

2.10 Adoption, use or disclosure of government related identifiers

- 2.10.1 In certain circumstances we may be required to collect government related identifiers such as your tax file number. We will not use or disclose this information unless we are authorised by law.
- 2.10.2 We do not use any government related identifiers (E.g. Tax File Number, Australian Business Number) as identifiers within our organisation.

2.11 Compliance and Complaints

- 2.11.1 If an individual has any concerns regarding the privacy of personal information, then the individual may make a complaint using the contact details above.
- 2.11.2 Our Directors will then endeavour to resolve the complaint within 10 working days. If resolution is not possible within this timeframe, we will contact you to discuss the matter further.
- 2.11.3 If you still feel your issue hasn't been resolved to your satisfaction, then you have the right under the Privacy Act to raise your concern with the Office of the Australian Information Commissioner.

2.12 Changes to this Privacy Policy

- 2.12.1 This Policy is subject to change over time without prior notice. We may amend this policy by updating its posting on the Rowe Partners' website.
- 2.12.2 **Requesting a Copy of the Privacy Policy** - Rowe Partner's privacy policy is available by following links to the policy on our website at <https://www.rowepartners.com.au/>