

## PRIVACY POLICY

This Privacy Policy is maintained by **EPRAKT PTY LTD ACN 603 476 848** (“we”, “us” and “our”) and relates to the collection and use of personal information you may supply to us or we may collect from you through your dealings with us, including via access to any system maintained by us or your conduct on any web site maintained by us.

We recognise the importance of protecting the privacy of your information, in particular information that is capable of identifying an individual ("personal information"). This Privacy Policy governs the manner in which your personal information will be dealt with including but not limited to collection, access, storage and use of personal information which we obtain as part of our business operation. By accessing our website, systems or databases maintained by us or otherwise transacting with us, you agree to and acknowledge the content of this Privacy Policy. This Privacy Policy is in addition to any other agreement or terms and conditions applicable to our dealings with you.

We reserve the right, at our discretion, to modify, add to or remove portions of this Privacy Policy at any time. You should review this Privacy Policy periodically so that you are updated on any changes. We welcome your comments and feedback.

### Personal Information

1. Personal information about you is collected only when knowingly and voluntarily submitted and when reasonably required by us to perform one or more of our functions or activities.
2. Personal Information is collected by us or on our behalf via the following means: direct requests for information made by us to you either verbally or in writing, online and hard copy application or order forms completed by you or on your behalf.
3. We may also collect personal information indirectly through third parties such as credit reporting agencies, your authorised representative, your bank or financial adviser, or via publicly available means or through websites (such as ASIC, ABN Lookup or social media sites) who disclose to their users that the user’s personal information is provided to businesses such as ours. We may also collect or have access to personal information obtained by related entities to fulfil the purpose for which the personal information was collected, or a related or ancillary purpose or otherwise in accordance with the Privacy Act. We will do this only where you have consented to or would reasonably expect us to obtain this information.
4. It is our intention that this Policy will protect your personal information from being dealt with in any way that is inconsistent with applicable privacy laws in Australia including the Australian Privacy Principles (APPs). The type of personal information that we may collect and hold includes:
  - your name, address, contact details such as telephone numbers and email address,
  - your gender and date of birth;
  - your job title, employment history and income details;
  - information to confirm your identity (such as drivers licence, passport)
  - bank account details, shareholdings and details of investments;
  - details of superannuation and insurance arrangements;
  - personal information about your spouse and dependants; and
  - and other information that is necessary in the ordinary course of our business.
5. Where it is reasonable and practical to do so we will only collect personal information about you from you. You have no obligation to provide any information requested by us however if you choose to withhold personal information from us it may prevent us from being able to provide you with the goods and/or services that you have requested.
6. We will take reasonable steps to ensure that your personal information is accurate, complete and

up-to-date as soon as practicable after receiving your notification of any error or inaccuracy.

#### **Provision of Personal Information about another person**

7. If you provide us with someone else's personal information, you should only do so if you have that person's authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the existence of and the matters set out in this Privacy Policy.

#### **Use of Information**

8. Personal information collected from you is used for the following purposes:
  - to provide tailored service and advice;
  - to liaise with other service providers on your behalf;
  - to manage your account with us;
  - to liaise with relevant government authorities on your behalf where we are authorised to do so or where such communications are reasonably expected in the circumstances;
  - to liaise with others in our firm to manage or administer aspects of the services that we provide to you;
  - to communicate with you regarding other relevant products and services we provide;
  - to notify of seminars and other events and provide you with other marketing material;
  - to conduct surveys;
  - for seeking your feedback; and
  - for any other business related purposes
9. Personal information is held in paper archives, by electronic or computer data base and remotely in cloud based storage systems.

#### **Disclosure**

10. We will not disclose your personal information unless you have consented to that disclosure. Your consent may be express or implied. Such disclosure may include to your financial advisers, bankers and their service providers, our merchant and payment organisations.
11. We may also disclose your personal information where it is required or authorised by or under an Australian law or a court/tribunal order or where a permitted general situation exists under the APPs. Where disclosure is necessary for an enforcement related activity of an enforcement agency, we will provide written notification of that disclosure as is required by the APPs.
12. We may engage third parties to provide you with goods or services on our behalf. In that circumstance, we may disclose your personal information to those third parties in order to meet your request for goods or services.
13. As part of provision of the services to you we may store your personal information using online software. The personal information that you provide to us may be transferred to the servers of our software providers as a function of transmission across the internet. By providing your personal information you are consenting to that personal information being transferred to and stored on the servers as set out in this Policy. However, as the third parties who host our servers do not control, and are not permitted to access or use your personal information (except for the limited purpose of storing the information), we do not "disclose" personal information to those server hosts, whether or not they are located overseas.
14. Notwithstanding the above, for the purpose of transparency we advise that the servers of our accounting and file storage software providers are located in both Australia and overseas, however this may change without prior notice to you. Your personal information may be routed through, and stored on, those servers.
15. We will use reasonable endeavours to ensure that our server hosts do not have access to, and use the

necessary level of protection to safeguard, your personal information and otherwise comply with the APPs. If you do not want your personal information to be transferred to a server located in the USA or to any other international locations, you should not provide us with your personal information or use our services.

### **Security**

16. We strive to ensure the security, integrity and privacy of personal information collected and held by us, and we review and update our security measures in light of current technologies. Unfortunately, we cannot guarantee that our data storage measures are totally secure.
17. However, we will endeavour to take all reasonable steps to protect the personal information we collect from you from misuse, interference, loss and unauthorised access, modification or disclosure.
18. Where the personal information is no longer required for the purpose for which it was collected (or a permitted secondary purpose) we will take reasonable steps to destroy or de-identify the information.

### **Using Government Identifiers**

19. In certain circumstances we may be required to collect government identifiers from or relating to you, such as your tax file number, Medicare number or pension or other benefit number. We will not use or disclose this information unless you have provided your consent to the disclosure or otherwise where we are required or authorised to do so by law.

### **IP Addresses**

20. If information is gathered by our website/portal or online database, our web servers may gather your IP address to assist with the diagnosis of problems or support issues with our services. This information is gathered in aggregate only and cannot be traced to an individual user.
21. Our website may contain links to third parties' websites, including sites maintained by related entities. Those other websites are not subject to this Privacy Policy. You should familiarise yourself and ensure you are comfortable with any particular privacy policies governing the use of those websites prior to such use.

### **Cookies and Applets**

22. We may use cookies to provide you with a better experience when using our website/portal. These cookies allow us to increase your security by storing your session ID and are a way of monitoring single user access. This aggregate, non-personal information is collated and provided to us to assist in analysing the usage of the site.

### **Access to Information**

23. Depending on which services you are attempting to access, you may be able interact with us anonymously or using a pseudonym. However, this will mean that there are some products and services that you will not be able to enjoy. These include online orders/purchases.
24. We will endeavour to take all reasonable steps to keep information about you accurate and up to date. If, at any time, you discover that information held about you is incorrect, you may contact us to have the information corrected. Further you may request access to any of your personal information we hold except if the provision of the information is contrary to any applicable privacy law.
25. In addition, our employees and the contractors who provide services related to our information systems are obliged to respect the confidentiality of any personal information held by us.
26. If you wish to make a complaint regarding any aspect of the collection, access to, use or storage of personal information by us, please make your complaint in writing to the address below. We will consider your complaint promptly and contact you to seek to resolve the matter. If we have not responded to you within a reasonable time, you are entitled under privacy legislation to make a complaint to the Office of the Australian Information Commissioner.
27. Please direct all requests for access to or correction of personal information or all complaints to:

[info@eprakt.com.au](mailto:info@eprakt.com.au)

**How long is it held for?**

28. Unless you specify an expiry date, we hold the information at a time of our own discretion.

**Questions**

29. For more information about privacy issues in Australia and protecting your privacy or to make a complaint about our handling of your personal information, visit the Office of the Australian Information Commissioner's web site - <http://www.oaic.gov.au/>