

Twenty Acres Accounting Pty Ltd - Privacy Policy

PRIVACY POLICY

The Company

1. **The Company** is hereinafter the entity referred to in **Schedule 1**.

The Company's Commitment to Privacy

2. The Company, its subsidiaries and affiliates in Australia (collectively referred to as The Company) are committed to managing personal information in accordance with the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (Privacy Act) and in accordance with other applicable privacy laws.
3. This document sets out our policies for managing your personal information and is referred to as our **Privacy Policy**.
4. In this **Privacy Policy**, "we" and "us" refers to The Company and "you" refers to any individual about whom we collect personal information.

About The Company

5. The Company operates in the business as set out under **Schedule 1**.
6. The Company offers a complete range of services as set out in **Schedule 1**.
7. Please contact us for a full list of the companies which comprise The Company and which are subject to this **Privacy Policy**.

What Information Does The Company Collect About You?

Clients and prospective clients

8. When you enquire about our services or when you become a client of The Company, a record is made which includes your personal information.
9. The type of personal information that we collect will vary depending on the circumstances of collection and the kind of service that you request from us but will typically include the personal information set out in **Schedule 1**.

Prospective employees/applicants

10. We collect personal information when recruiting personnel, such as your name, contact details, qualifications, and work history. Generally, we will collect this information directly from you.

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11. We may also collect personal information from third parties in ways which you would expect (eg, from recruitment agencies or referees you have nominated). Before offering you a position, we may collect additional details such as your tax file number and superannuation information and other information necessary to conduct background checks to determine your suitability for certain positions (eg, positions which involve working with children).

Other individuals

12. The Company may collect personal information about other individuals who are not clients of The Company. This includes customers and members of the public who participate in events we are involved with; individual service providers and contractors to The Company; and other individuals who interact with The Company on a commercial basis. The kinds of personal information we collect will depend on the capacity in which you are dealing with The Company. Please see **Schedule 1** for the general personal information that is likely to be collected.
13. If you are participating in an event we are managing or delivering, we may take images or audio-visual recordings which identify you.
14. In limited circumstances, The Company may collect information which is considered sensitive information. For example, if you are injured at an event promoted or delivered by The Company we may collect health information about you in an emergency or otherwise with your consent.
15. We may collect personal information about children (eg, when children participate in events we are involved with). Where children do not have sufficient maturity and understanding to make decisions about their personal information, we will require their parents or guardians to make decisions on their behalf.
16. You can always decline to give The Company any personal information we request, but that may mean we cannot provide you with some or all of the services you have requested. If you have any concerns about personal information we have requested, please let us know.

Visitors to our websites

17. The way in which we handle the personal information of visitors to our websites is discussed below.

How and Why Does The Company Collect and Use Your Personal Information?

18. The Company collects personal information reasonably necessary to carry out our business, to assess and manage our clients' needs, and provide services that are set out in **Schedule 1**. We may also collect information to fulfil administrative functions associated with these services, for example billing, entering into contracts with you and/or third parties and managing client relationships.
19. The purposes for which The Company usually collects and uses personal information depends on

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the nature of your interaction with us, but may include the purposes that are set out in **Schedule 1**.

20. The Company generally collects personal information directly from you. We may collect and update your personal information over the phone, by email, over the internet or social media, or in person. We may also collect personal information about you from other sources, eg:

- insert sources where The Company collect information;
- our affiliated and related companies; and
- third-party suppliers and contractors who assist us to operate our business.

21. The Company also collects and uses personal information for market research purposes and to innovate our delivery of products and services.

How Does The Company Interact With You Via the Internet?

22. You may visit our websites (**Schedule 1**) without identifying yourself. If you identify yourself (for example, by providing your contact details in an enquiry), any personal information you provide to The Company will be managed in accordance with this **Privacy Policy**.

23. The Company's websites use cookies. A "cookie" is a small file stored on your computer's browser, which assists in managing customised settings of the website and delivering content. We collect certain information such as your device type, browser type, IP address, pages you have accessed on our websites and on third-party websites. You are not identifiable from such information.

24. You can use the settings in your browser to control how your browser deals with cookies. However, in doing so, you may be unable to access certain pages or content on our website.

25. The Company's websites may contain links to third-party websites. The Company is not responsible for the content or privacy practices of websites that are linked to our website.

Can You Deal With The Company Anonymously?

26. The Company will provide individuals with the opportunity of remaining anonymous or using a pseudonym in their dealings with us where it is lawful and practicable (for example, when making a general enquiry). Generally, it is not practicable for The Company to deal with individuals anonymously or pseudonymously on an ongoing basis. If we do not collect personal information about you, you may be unable to utilise our services or participate in our events, programs, or activities we manage or deliver.

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How Does The Company Hold Information?

- 27. The Company stores information in paper-based files or other electronic record keeping methods in secure databases (including trusted third-party storage providers based in Australia and overseas). Personal information may be collected in paper-based documents and converted to electronic form for use or storage (with the original paper-based documents either archived or securely destroyed). We take reasonable steps to protect your personal information from misuse, interference, and loss and from unauthorised access, modification, or disclosure.
- 28. The Company maintains physical security over paper and electronic data stores, such as through locks and security systems at our premises. We also maintain computer and network security, eg, we use firewalls (security measures for the Internet) and other security systems such as user identifiers and passwords to control access to our computer systems.
- 29. Our websites do not necessarily use encryption or other technologies to ensure the secure transmission of information via the internet. Users of our websites are encouraged to exercise care in sending personal information via the internet.
- 30. We take steps to destroy or de-identify information that we no longer require.

Does The Company Use or Disclose Your Personal Information for Direct Marketing?

- 31. The Company may use or disclose your personal information for the purpose of informing you about our services, upcoming promotions and events, or other opportunities that may interest you. If you do not want to receive direct marketing communications, you can opt-out at any time by contacting us using the contact details below.
- 32. If you opt-out of receiving marketing material from us, The Company may still contact you in relation to its ongoing relationship with you.

How Does The Company Use And Disclose Personal Information?***For clients***

- 33. The purposes for which we may use and disclose your personal information will depend on the services we are providing you. For example, if you have engaged us to deliver a service, we may disclose information about you to service providers where this is relevant to our services.

For customers and participants

- 34. If you are a customer or participant in an event, we may disclose your personal information to our clients and venues where this is reasonably necessary for, and relevant to, the delivery of the event. We may use images or audio-visual recordings which identify you for promotional purposes where you would reasonably expect this to occur.

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Disclosure to contractors and other service providers

35. The Company may disclose information to third parties we engage in order to provide our services, including contractors and service providers used for data processing, data analysis, customer satisfaction surveys, information technology services and support, website maintenance or development, printing, archiving, mail-outs, and market research.
36. Personal information may also be shared between related and affiliated companies of The Company, located in Australia and overseas.
37. Third parties to whom we have disclosed your personal information may contact you directly to let you know they have collected your personal information and to give you information about their privacy policies.

Use and disclosure for administration and management

38. The Company will also use and disclose personal information for a range of administrative, management and operational purposes. This includes:
- administering billing and payments and debt recovery;
 - planning, managing, monitoring, and evaluating our services;
 - quality improvement activities;
 - statistical analysis and reporting;
 - training staff, contractors, and other workers;
 - risk management and management of legal liabilities and claims (eg, liaising with insurers and legal representatives);
 - responding to enquiries and complaints regarding our services;
 - obtaining advice from consultants and other professional advisers; and
 - responding to subpoenas and other legal orders and obligations.

Other uses and disclosures

39. We may use and disclose your personal information for other purposes explained at the time of collection or otherwise as set out in this **Privacy Policy**.

Does The Company Disclose Your Personal Information Overseas?

40. The Company is a global organisation and works with clients, service providers, sponsors, and commercial interests across the globe. It is likely that your personal information will be disclosed to overseas recipients.

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41. Unless we have your consent, or an exception under the APPs applies, we will only disclose your personal information to overseas recipients where we have taken reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to your personal information.
42. Entities which are related entities of The Company or are otherwise affiliated with The Company, have operations in the countries that are set out in **Schedule 1**. In circumstances where your information is disclosed to overseas recipients, those recipients are likely to be located in countries in the regions in which The Company and its related entities and affiliates operate.
43. You are entitled to access your personal information held by The Company on request. To request access to your personal information please contact our Privacy Officer using the contact details set out below.
44. You will not be charged for making a request to access your personal information but you may be charged for the reasonable time and expense incurred in compiling information in response to your request.
45. We will take reasonable steps to ensure that the personal information we collect, use, or disclose is accurate, complete and up to date. You can help us to do this by letting us know if you notice errors or discrepancies in information, we hold about you and letting us know if your personal details change.
46. However, if you consider any personal information, we hold about you is inaccurate, out-of-date, incomplete, irrelevant, or misleading you are entitled to request correction of the information. After receiving a request from you, we will take reasonable steps to correct your information.
47. We may decline your request to access or correct your personal information in certain circumstances in accordance with the APPs. If we do refuse your request, we will provide you with a reason for our decision and, in the case of a request for correction, we will include a statement with your personal information about the requested correction.

What Should You Do if You Have a Complaint About the Handling of Your Personal Information?

48. You may contact The Company at any time if you have any questions or concerns about this **Privacy Policy** or about the way in which your personal information has been handled.
49. You may make a complaint about privacy to the Privacy Officer at the contact details set out below.
50. The Privacy Officer will first consider your complaint to determine whether there are simple or immediate steps which can be taken to resolve the complaint. We will generally respond to your complaint within a week.
51. If your complaint requires more detailed consideration or investigation, we will acknowledge receipt of your complaint within a week and endeavour to complete our investigation into your

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complaint promptly. We may ask you to provide further information about your complaint and the outcome you are seeking. We will then typically gather relevant facts, locate, and review relevant documents and speak with individuals involved.

52. In most cases, we will investigate and respond to a complaint within 30 days of receipt of the complaint. If the matter is more complex or our investigation may take longer, we will let you know.

53. If you are not satisfied with our response to your complaint, or you consider that The Company may have breached the APPs or the Privacy Act, a complaint may be made to the Office of the Australian Information Commissioner (OAIC). The OAIC can be contacted by telephone on 1300 363 992 or by using the contact details on the OAIC website.

How are Changes Made to this Privacy Policy?

54. The Company may amend this Privacy Policy from time to time, with or without notice to you. We recommend that you visit our website regularly to keep up to date with any changes.

How can you Contact The Company?

55. The contact details for The Company are listed in **Schedule 1**.

Definitions:

56. All the terms are defined in Schedule 1

This Privacy Policy was last updated in 26 May 2024.

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Schedule 1

In this agreement, the descriptions for the following terms are set out in the following **Table**:

Term	Description
The Company	TWENTY ACRES ACCOUNTING PTY LTD: ACN 675 707 490
About The Company	The company provides public accounting and taxation services to individuals and businesses
Range of Services	Please refer to our page on “Services”
Personal Information - <i>Clients and prospective clients</i>	<ul style="list-style-type: none"> • your name, e-mail, postal address, and other contact details; • information about your employer or an organisation who you represent; • your professional details; and • any additional personal information you provide to us, or authorise us to collect, as part of your interaction with the company
Personal Information - <i>Other individuals</i>	<ul style="list-style-type: none"> • your name; • contact details; and • information regarding our interactions and transactions with you
Purposes of Collecting and Using Personal Information	<ul style="list-style-type: none"> • responding to requests for information and other general inquiries • researching, developing, and expanding our facilities and services • informing you of our activities, events, facilities, and services • recruitment processes (including for volunteers, internships, and work experience); and • responding to enquires and complaints
Website	www.twentyacresaccounting.com.au
Countries	Australia only

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Company Details	The company privacy officer:	Michael Martion
	Address:	727 Old Bunbury Road West Coolup, WA, 6214
	email:	admin@twentyacresaccounting.com.au
	phone	(08) 9516 2000