

NorthCorp's Privacy Policy

Introduction

NorthCorp Accountants and Wealth Management (NorthCorp) 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 Privacy Policy sets out how NorthCorp handles personal information.

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

From time to time, NorthCorp may review and amend this privacy policy. We may notify you of any changes by posting a new version of our policy onto our website.

Personal Information we collect

The types of personal information we may collect include;

- names, contact and address details;
- employer and job title;
- information in identification documents (for example, passport, driver's licence);
- tax file numbers and other government issued identification numbers;
- date of birth and gender;
- personal information about your spouse and dependants.
- bank account details, shareholdings and other investments;
- details of superannuation and insurance arrangements;
- education and qualifications, employment history and salary;
- and visa or work permit status;

It may be necessary in some circumstances for NorthCorp to collect sensitive information about you in order to provide specific services or for recruiting purposes. Examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal record and health information.

We will only collect sensitive information in limited circumstances with your consent or where required or permitted by law.

How we collect and manage your personal information

How we collect your personal information

Generally we collect your personal information from you directly (for example, when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey, or when you subscribe to our newsletters). Sometimes it may be necessary for us to collect your personal information from a third party. For example, we may collect your personal information from your employer where they are our client, from your personal representative, or a publically available record.

We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process on our websites.

Where you provide us with personal information about someone else

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

Holding personal information

NorthCorp holds personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold using both physical and technology security measures (for example, security passes to enter our offices and storage files in lockable cabinets, restriction of access to electronic files, firewalls, and the use of passwords). We also have document retention policies and processes.

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Purpose for collecting, holding and disclosing personal information

NorthCorp collects, holds and uses personal information for a number of purposes including;

- to provide professional services;
- for administrative purposes;
- to respond to requests or queries;
- to maintain contact with our clients and other contacts;
- to keep our clients and other contacts informed of our services and industry developments;
- to notify of seminars and other events;
- for recruitment purposes;
- for purposes relating to the employment of our personnel;
- to manage any conflict of interest or independence requirements (including auditor independence);
- to conduct surveys;
- for seeking your feedback;
- to meet any regulatory obligations; or
- for any other business related purposes.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

The types of third parties to whom we may disclose your personal information include:

- experts or other third parties contracted as part of an engagement;
- our service providers
- our personal advisers;
- as part of an engagement, if you are a customer, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services for that client; or
- government or regulatory bodies or agencies, (for example, ATO or ASIC)

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you.

Disclosure of personal information overseas

NorthCorp will not generally transfer personal information outside of Australia. We will only do so with your expressed written consent.

Direct Marketing

NorthCorp may also use your personal information, for the purpose of marketing services. If you do not want to receive marketing material from us, you can contact us as detailed below:

- for electronic communication, you can select the unsubscribe function in the communication; or
- for hard copy communication, you can email unsubscribe@northcorp.com.au ; or
- through our contact details below.

Privacy on our websites

Cookies

"Cookies" (i.e. small text files placed on your computer when you first visit the website) are used on the NorthCorp website. Most browsers now recognise when a cookie is offered and permit you to use or accept it. If you are not sure whether your browser has the capability, you should check with your company's technology help desk or your internet service provider.

Cookies are primarily used to enhance your online experience. If you visit to read or download information, such as news stories or articles, much of the information we may collect is statistical only (e.g., the date and the time you accessed our site, and the internet address of the website from which you linked directly to/from our site) and not personally identifiable. We may use such information to make our sites more useful and attractive to you.

Your choices

You have several choices regarding your use of NorthCorp's website. In general, you are not required to provide personal information when you visit our website. However, if you apply to receive information about our services, events and industry updates or wish to apply for a job, provision of certain personal information will generally be required.

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Links to third party websites

NorthCorp's websites may contain links to third parties' websites; these websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of their privacy policy. NorthCorp also does not endorse, approve or recommend the services or products provided on third party websites.

Gaining access to personal information we hold

You may request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing to the Privacy Officer. Please see the "how to contact us" section for details.

NorthCorp may charge you reasonable costs for providing you access to your personal information.

Keeping Personal information current

If you believe that any personal information NorthCorp collects has collected about you is inaccurate, not up-to-date or complete, irrelevant or misleading, you may request correction. To do so, please contact the Privacy Officer and we will take reasonable steps to correct it in accordance with the requirements of the *Privacy Act*. Please see the "How to contact us" section for details as how to contact the Privacy Officer.

Complaints

If you wish to make a complaint to NorthCorp about our handling of your personal information, you can contact the Privacy Officer as set out in "how to contact us" section. You will be asked to set out the details of your complaint in writing in a form provided.

NorthCorp will endeavour to reply to you within 30 days of receipt of the completed complaint, and where appropriate, will advise you of the general reasons for the outcome of the complaint.

In some circumstances, the Privacy Officer may decline to investigate the complaint, for example if the complaint relates to an act or practice that is not an interference of privacy of the person making the complaint.

If you are not satisfied with the outcome of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner.

How to Contact us

If you have a query in relation to this Privacy Policy or you would like to notify NorthCorp that you no longer wish to receive marketing material from us, access or correct personal information or to make a complaint about NorthCorp's handling of your personal information, Please contact NorthCorp as follows:

NorthCorp Privacy Officer

NorthCorp Accountants and Wealth Management
PO Box 166
Port Macquarie NSW 2444

Phone: +61 2 6588 4444

Fax: +61 2 6583 4527

Email: northcorp@northcorp.com.au