



PRIVACY POLICY

1. Introduction

- 1.1. At Cheesman Applegarth & Partners ABN 99 421 914 597 (Cheesman Applegarth), we take privacy very seriously. We've updated our privacy policy (Policy) to ensure that we communicate to You, in the clearest way possible, how we treat personal information. We encourage You to read this Policy carefully. It will help You make informed decisions about sharing Your personal information with us.
- 1.2. The defined terms in this Policy have the same meaning as in our Terms of Engagement which You should read together with this Policy. By accessing our Website and using our Services, You consent to the terms of this Policy and agree to be bound by it and our Terms of Engagement.
- 1.3. Cheesman Applegarth recommends that You visit our website to view the full Policy or alternatively request a copy of the Policy from our Privacy Officer.
- 1.4. Cheesman Applegarth are tax agents registered under the *Tax Agent Services Act 2009* and are subject to the *Taxation Administration Act 1953*.

2. Cheesman Applegarth collects Your personal information

- 2.1. Cheesman Applegarth is a provider of accounting, taxation, business advisory, succession planning, superannuation and information technology services (Services).
- 2.2. The Services involve the storage of Data about a company or individual. That Data can include personal information. "Personal information" is information about an identifiable individual, and may include information such as the individual's name, email address, telephone number, address details, date of birth and other personal information to perform our Services including but not limited to bank account details, tax file number, details of directorships, shareholdings and other investments.
- 2.3. Cheesman Applegarth may collect personal information directly from You when You:
 - (a) register to use any Services,
 - (b) use any Services, and
 - (c) visit our [Website](#).
- 2.4. You can always choose not to provide Your personal information to Cheesman Applegarth, but it may mean that we are unable to provide You with the Services.

3. Cheesman Applegarth may receive personal information from You about others

- 3.1. Through Your use of the Services, Cheesman Applegarth may also collect information from You about someone else. If You provide Cheesman Applegarth with personal information about someone else, You must ensure that You are authorised to disclose that information to Cheesman Applegarth and that, without Cheesman Applegarth taking any further steps required by applicable data protection or privacy laws, Cheesman Applegarth may collect, use and disclose such information for the purposes described in the Policy.
- 3.2. This means that You must take reasonable steps to ensure the individual concerned is aware of and/or consents to the various matters detailed in this Policy. Where requested to do so by Cheesman Applegarth, You must also assist Cheesman Applegarth with any requests by the individual to access or update the personal information You have collected from them and provided to Cheesman Applegarth.

4. Cheesman Applegarth collects, holds, and uses Your personal information for limited purposes

- 4.1. Cheesman Applegarth collects Your personal information so that we can provide You with the Services and any related services You may request. In doing so, Cheesman Applegarth may use the personal information we have collected from You for purposes related to the Services including to:

- (a) verify Your identity,
- (b) administer the Services,
- (c) notify You of new or changed services offered in relation to the Services,
- (d) carry out marketing and business development opportunities including but not limited to issuing of newsletters, sending invitations to events and sending information on related services,
- (e) training relating to the Services,
- (f) assist with the resolution of technical support issues or other issues relating to the Services,
- (g) comply with laws and regulations in applicable jurisdictions, and
- (h) communicate with You.

- 4.2. By using the Services, You consent to Your personal information being collected, held and used in this way and for any other use You authorise. Cheesman Applegarth will only use Your personal information for the purposes described in this Policy or with Your express permission.

5. Cheesman Applegarth can aggregate Your non-personally identifiable data

- 5.1. By using the Services, You agree that Cheesman Applegarth can access, aggregate and use non-personally identifiable data Cheesman Applegarth has collected from You. This data will in no way identify You or any other individual.
- 5.2. Cheesman Applegarth may use this aggregated non-personally identifiable data to:
 - (a) assist us to better understand how our customers are using the Services,
 - (b) provide our customers with further information regarding the uses and benefits of the Services,
 - (c) enhance small business productivity, including by creating useful business insights from that aggregated data and allowing You to benchmark Your business' performance against that aggregated data, and
 - (d) otherwise to improve the Services.

6. Cheesman Applegarth holds your personal information on servers.

- 6.1. All Data, including personal and non-personal information, is held in either electronic form and/or in hard copy form, both at our own premises and with the assistance of outside service providers. By using the Services, You consent to Your personal information being transferred to our servers as set out in the Policy.
- 6.2. If You do not want Your personal information to be transferred to a server, You should not provide Cheesman Applegarth with Your personal information or use the Services.

7. Cheesman Applegarth takes steps to protect your personal information

- 7.1. Cheesman Applegarth is committed to protecting the security of Your personal information and we take all reasonable precautions to protect it from unauthorised access, modification or disclosure. Your personal information is stored on secure servers that have SSL Certificates issued by leading certificate authorities, and all Data transferred between You and the Services is encrypted. [You can find out more about our security arrangements and our data protection measures on our security page.]
- 7.2. However, the Internet is not in itself a secure environment and we cannot give an absolute assurance that Your information will be secure at all times. Transmission of personal information over the Internet is at Your own risk and You should only enter, or instruct the entering of, personal information to the Services within a secure environment.

8. Cheesman Applegarth only discloses Your Personal Information in limited circumstances

- 8.1. Cheesman Applegarth will only disclose the personal information You have provided to us to entities outside the Cheesman Applegarth group of companies if it is necessary and appropriate to facilitate the purpose



- for which Your personal information was collected pursuant to the Policy, including the provision of the Services.
- 8.2. Cheesman Applegarth will not otherwise disclose Your personal information to a third party unless You have provided Your express consent. However, You should be aware that Cheesman Applegarth may be required to disclose Your personal information without Your consent in order to comply with any court orders, subpoenas, or other legal process or investigation including by tax authorities, if such disclosure is required by law. Where possible and appropriate, we may notify You if we are required by law to disclose Your personal information.
- 9. Cheesman Applegarth does not store Your credit card details**
- 9.1. If You choose to pay for the Services by credit card, Your credit card details are not stored by the Services and cannot be accessed by Cheesman Applegarth staff.
- 10. You may request access to Your personal information**
- 10.1. It is Your responsibility to ensure that the personal information You provide to us is accurate, complete and up-to-date. You may request access to the information we hold about You, or request that we update or correct any personal information we hold about You, by setting out Your request in writing and sending it to us at admin@applegarth.com.au.
- 11. Cheesman Applegarth uses cookies**
- 11.1. In providing the Services, Cheesman Applegarth may utilise "cookies". A cookie is a small text file that is stored on Your computer for record-keeping purposes. A cookie does not identify You personally or contain any other information about You but it does identify Your computer.
- 11.2. We and some of our affiliates and third-party service providers may use a combination of "persistent cookies" (cookies that remain on Your hard drive for an extended period of time) and "session ID cookies" (cookies that expire when You close Your browser) on the Website to, for example, track overall site usage, and track and report on Your use and interaction with ad impressions and ad services.
- 11.3. You can set your browser to notify You when You receive a cookie so that You will have an opportunity to either accept or reject it in each instance. However, You should note that refusing cookies may have a negative impact on the functionality and usability of the Website.
- 11.4. We do not respond to or honour "Do Not Track" requests at this time.
- 12. You can opt-out of any email communications**
- 12.1. Cheesman Applegarth may send billing information, product information, Services updates and Services notifications to You via email. Our emails will contain clear and obvious instructions describing how You can choose to be removed from any mailing list not essential to the Services. Cheesman Applegarth will remove You at Your request.
- 13. Cheesman Applegarth has a privacy complaints process**
- 13.1. If You wish to complain about how we have handled Your personal information, please provide our Privacy Officer with full details of Your complaint and any supporting documentation:
- (a) by e-mail at admin@applegarth.com.au or
- (b) by letter to The Privacy Officer, Cheesman Applegarth & Partners, PO Box 121, Toowoomba QLD 4350 Australia.
- 13.2. Our Privacy Officer will endeavour to:
- (a) provide an initial response to Your query or complaint within 10 business days, and
- (b) investigate and attempt to resolve Your query or complaint within 30 business days or such longer period as is necessary and notified to you by our Privacy Officer.
- 14. This policy may be updated from time to time**
- 14.1. Cheesman Applegarth reserves the right to change this Policy at any time, and any amended Policy is effective upon posting to this Website. Cheesman Applegarth will make every effort to communicate any significant changes to You via email or notification via the Services. Your continued use of the Services will be deemed acceptance of any amended Policy.
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