

# WCA Privacy Policy

## Introduction

WCA Chartered Accountants are committed to protecting the privacy of the personal information we collect from you and handling your personal information in a responsible manner. We are bound by the Privacy Act and the Australian Privacy Principles (APPs) which regulate the collection, use and disclosure of personal information.

This Privacy Policy explains:

- The scope of our Privacy Policy
- Your choices
- Types of information collected
- How we collect personal information
- Purpose of disclosure
- Failure to provide information
- Use and disclosure
- Security
- Our website
- Access and correction
- Complaints and feedback

We reserve the right to review, and if necessary, change this Privacy Policy. We will post changes to this Privacy Policy on our Website. This Privacy Policy is on our Website.

This Privacy Policy explains how we collect, use and disclose your personal information, how you can access and seek correction of the information we hold about you and how we otherwise manage your personal information. This Privacy Policy also explains how you can make a complaint about a breach of the Privacy Act or Australian Privacy Principles. We do not make any representations about third party websites that may be linked to the Website.

## Scope

This Privacy Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on our behalf. This policy applies to independent contractors and job applicants, as well as individuals who provide us with their personal information.

This Privacy Policy does not apply to our acts and practices which relate directly to the employee records of our current and former employees.

### **Your choices**

You have a choice regarding your use of WCA'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, we may require you to provide certain personal information. You do have the right to remain anonymous or use a pseudonym, but this may restrict the provision of our services.

### **Types of information collected**

We collect and hold personal information about you, that is information that can identify you and is necessary and relevant to providing you with the professional services that you are seeking. The kinds of information we typically collect include your name, address, date of birth, gender, job titles and any other information that may be relevant to the provision of accounting services, such as bank account details, credit card details, shareholdings, details of investments and tax file numbers. It may occasionally be necessary to collect sensitive information about you, for example, your professional memberships, criminal record or health information. Except as otherwise permitted by law, we only collect, use and disclose sensitive information about you if you consent to the collection, use and disclosure of the information and if the information is reasonably necessary for the performance of our functions and activities.

### **How we collect personal information**

Wherever practicable, we will only collect information from you personally, for example when we deal with you in person or over the phone, when you send us details via correspondence or when you subscribe electronically to our publications. Sometimes it may be necessary to collect your personal information from a third party. An example of this could be when we collect personal information about you from your authorised or personal representative or from a publically available record. We may also collect information about you from your use of our website or through any registration process on our website. If you provide us with someone else's personal information, you should only do so when you have their permission. You should also take reasonable steps to inform that person of the matters set out in this Privacy Policy.

There may, however, be some instances where personal information about you will be collected indirectly because it is unreasonable or impractical to collect personal information directly from you. We will usually notify you about these instances in advance, or where that is not possible, as soon as reasonably practicable after the information has been collected.

### **Purpose of disclosure**

The personal information we collect and hold about you, depends on your interaction with us. Generally, we collect, use and hold your personal information for a number of purposes, including:

- to provide professional services to you or someone else you know;
- to process transactions;
- to provide accounting services and solutions through technology;
- to provide you with information and marketing material about other services that we offer that may be of interest to you;
- to respond to requests;
- to maintain contact with you;
- to provide you with information relevant to your type of business or other area of expertise or interest;
- to keep you informed of our services and industry developments;
- to provide you with the opportunity to meet other people and attend seminars, conferences or other events in your type of business, or other area of expertise or interest;
- to facilitate our internal business operations, including the fulfilment of any legal or regulatory requirements;
- for administrative purposes;
- for recruitment purposes;
- to analyse our services and client needs with a view to improving those services;
- for engagement of service providers, contractors or suppliers relating to the operation of our business; and

- for other purposes related to the performance of our business functions and activities as Accountants, Auditors and Business Advisors.

Generally, personal information submitted through the website is used and disclosed for:

- the purpose for which it is submitted (primary purpose); any secondary purpose related to the provision of our services;
- purposes where it can be reasonably inferred from the circumstances that you consent to your personal information being used (implied consent). For example, if you provide us with your personal information to subscribe to our newsletters, your consent will be implied for us to use and disclose your information to inform you of products and services that we believe may interest you. However, your implied consent for us to do this can be withdrawn at any time by telling us; and
- any purpose disclosed in this revised Privacy Policy, the Terms, on the website or at the time of collection.

If you do not want to receive marketing material from us, you can contact us as detailed at the end of this Privacy Policy (see 'How to contact us'). You will also have the option to 'unsubscribe' to any electronically generated communication.

### **Failure to provide information**

If the personal information you provide to us is incomplete or inaccurate, we may be unable to provide you, or someone else you know, with the services you, or they, are seeking.

### **Use and disclosure**

Generally, we only use personal information about you for the purpose for which it was collected (as set out above). We disclose personal information about you to:

- experts of other third parties contracted as part of an engagement with us;
- our service providers, who assist us in operating our business (including technology service providers), and who may not be required to comply with our privacy policy;
- our professional advisors;
- a client, if you are a contractor or a supplier of services to a client;

- our related entities and other organisations with whom we have affiliations with so that those organisations may provide you with information about services and various promotions.

In some circumstances, the law may permit or require us to use or disclose personal information for other purposes (for instance, where you would reasonably expect us to and the purpose is related to the purpose of collection). We are not likely to disclose your personal information overseas. However there may be situations where your work may be completed in part overseas. WCA will confirm if any of your personal information will be sent overseas.

## **Security**

We store your personal information in different ways, including in paper and electronic format. The security of your personal information is important to us. We take reasonable measures to ensure that your personal information is stored safely to protect it from misuse, loss, interference, unauthorised access, modification or disclosure. These measures include electronic and physical security measures, such as:

- securing our premises, by requiring security passes to enter our offices;
- placing passwords and varying access levels on databases to limit access and protect electronic information;
- the use of firewalls, encryption, passwords and digital certificates; and
- providing locked cabinets and rooms for the storage of physical records.

## **Our Website**

If you access our website, we may collect additional information about you in the form of your IP address or domain name. Our website uses 'Cookies'. Cookies are small text files placed on your computer when you first visit the site and are used on some parts of our website. Most browsers now recognise when a cookie is offered and permit you to refuse or accept it. If you are not sure whether your browser has this capability, you should check with the software manufacturer, your company's IT help desk or your Internet service provider. We sometimes use cookies to analyse statistical data such as the date and time that you accessed the site and the internet address of the site that linked you to our site. We do not and are not able to use cookies to gain personal information.

Our website may contain links to other websites. We are not responsible for the privacy practices of linked websites and any linked websites are not subject to our privacy policies and procedures. The Global Safety Index Site may link to websites operated by

third parties. These third party websites are not under our control and we do not accept any responsibility for the conduct or operation of third party websites. Before disclosing information on any other website you should examine the terms and conditions and privacy policy of that website.

## **Access and correction**

You can request access to your personal information we hold about you by making a request to us in writing. We will endeavour to respond to your request within a reasonable period. We may charge you a reasonable fee for processing your request (but not for making a request for access). We may decline a request for access to personal information in circumstances prescribed by the Privacy Act, including when:

- the request is considered frivolous or vexatious;
- giving access would reveal information related to a commercially sensitive decision making process;
- giving access would be unlawful; or
- giving access would likely prejudice enforcement related activities relating to criminal activities and other breaches of law.

If we decline a request for access to personal information, we will provide you with a written notice that sets out the reasons for the refusal (unless it would be unreasonable to provide those reasons) and the mechanisms available to you to make a complaint. If, upon receiving access to your personal information, or at any other time, you believe the personal information we hold about you is inaccurate, incomplete or out of date, please notify us immediately in writing. We take reasonable steps to correct the information so that it is accurate, complete and up to date. For this purpose our staff may ask you to confirm that your contact details are correct when you attend an appointment or interact with us at any other time. If we refuse to correct your personal information, we will provide you with a written notice that sets out the reasons for our refusal (unless it would be unreasonable to provide those reasons) and the mechanisms available to you to make a complaint.

## **Complaints and feedback**

If you have a complaint about a breach of the Privacy Act, Australian Privacy Principles or a privacy code that applies to us, we ask that you contact us in writing using the details set out below (see 'How to contact us'). Upon receipt of a written complaint we will take reasonable steps to investigate the complaint and respond to you in accordance with our complaints handling procedures. If you are dissatisfied with our response you may complain directly to the Australian Information Commissioner. If you have a complaint about the privacy of your personal information, we ask that you contact us in writing (see 'How to contact us').

## **How to contact us**

If you would like to contact us for any reason relating to your personal information or if you have a query in relation to our Privacy Collection Statement or Revised Privacy Policy or you would like to make a complain about WCA handling of your personal information, please contact WCA as follows:

WCA Chartered Accountants

158 Molesworth Street

Lismore NSW 2480

T. 02 6621 2581

F. 02 6621 9740

E. [admin@wca.com.au](mailto:admin@wca.com.au)