

## Privacy Statement

To ensure that Heaney Business Group protects private information.

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### Introduction

#### Who does this Privacy Statement apply to?

This Privacy Statement ("this Statement") applies to "Heaney Business Group" ("we" or "us"), which includes mention of all our trading names:

- Heaney Business Group
- HBG Tax
- HBG Tax & Accounting

We want you to know that we are committed to protecting your privacy and handling your personal information in an open and transparent way.

#### What does this Privacy Statement cover?

This Statement explains how we collect, handle, store and protect personal information when:

- We provide professional services to our clients
- You use "this Website" or
- We perform any other activities that form part of the operation of our business.

When we refer to "this Website" we are talking about websites associated with Heaney Business Group. This includes:

- Pages accessed using the [www.hbgtax.com.au](http://www.hbgtax.com.au) URL

#### What laws apply to us?

When handling personal information, we will comply with the Australian Privacy Principles (APPs) contained in the *Privacy Act 1988* (Cth) (Privacy Act) and other applicable legislation (such as Australian State and Territory health privacy legislation, as well as the *Spam Act 2003* (Cth) and the *Do Not Call Register Act 2006* (Cth)). The APPs are legally binding principles that are designed to ensure that individuals' personal information is protected throughout the information lifecycle – that is, from the time the information is collected through to its destruction. The APPs also give individuals the right to access their personal information and have it corrected if it is incorrect.

We take our obligations under the APPs and Australian State and Territory privacy legislation seriously. Therefore, in addition to this statement, we also, where appropriate, include terms in our agreements with our clients that describe how we handle personal information during the delivery of our professional services.

### What personal information do we collect?

#### Information we collect when we provide professional services to our clients

We may be provided with personal information directly by our clients to enable us to deliver professional services or to perform due diligence checks before we agree to provide services. This information may relate to clients' employees, members or customers or it may relate to third parties (for example, the spouses and dependents of a client's employees, members or customers).

As part of providing professional services to our clients, we may also collect personal information from other sources (such as directly from individuals themselves or information that is publicly available).

The types of personal information we may collect or be provided with include, but are not limited to:

- Names, addresses, telephone numbers and email addresses;
- Date of birth and gender;
- Employment status;
- Financial records;
- Complaint details.

We may also collect sensitive and special categories of personal information. For example, where we are provided with such information directly by our clients to provide professional services, or where we collect information

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directly from individuals with their consent. This may include:

- Bank account details;
- Government identifiers such as drivers' license, passport and Medicare numbers and visa/work permit status;
- Tax file numbers;
- Health records;
- Information about racial or ethnic origins;
- Information about criminal convictions;
- Membership of a political association or membership of a trade union;
- Personal information about your spouse and dependents;
- Shareholding and investment details;
- Superannuation Details.

Where we are provided with personal information by a client, we take steps to ensure that the client has complied with the relevant obligations under the Privacy Act in relation to that information; this may include, for example, that the client has provided you with notice of the collection (and other matters) and has obtained any necessary consent for us to collect, use and disclose that information.

We also collect personal information (such as contact details and account details) from suppliers, contractors and third-party service providers that we engage to help us operate our business.

### **Information we collect when we perform any other activities that form part of the operation of our business**

We may collect personal information when performing other activities that form part of the operation of our business, but which do not directly form part of providing professional services to our clients. For example, we might collect personal information from members of the public as part of undertaking surveys.

The types of information that we collect may vary depending on the nature of the activity. However, we will take reasonable steps to provide clear information about the nature of those activities and the purpose for which we are collecting your information.

### **Information we collect via this Website (Log information, cookies, and web beacons)**

We may collect personal contact details from you when you use this Website. For example, if you sign up to receive newsletters.

To improve your experience when you use this Website and ensure that it is functioning effectively, we may use cookies (small text files stored in a user's browser) and Web beacons (electronic images that allow this Website to count visitors who have accessed a page) on some areas of our website.

## **How do we use your personal information?**

### **How do we use personal information collected to provide services to our clients?**

We use the personal information that we collect to provide clients with agreed services. We have an agreement with each client that governs the provision of our services and sets out the purposes for which we may use any information that the client provides to us (including any personal information). We use that information as permitted by the client agreement and we do not use that information for any other purposes, unless it is necessary to comply with a legal or professional right or duty.

Because we provide a wide range of different types of services to our clients, the way we use personal information also varies.

For example, we might use personal information:

- About a client's employees to help those employees manage their tax affairs when working overseas
- About a client's customers to help the client improve the quality of the services they offer
- Collected by a client as part of their ordinary business activities during helping that client restructure their business
- Collected by a client as part of their ordinary business activities to help that client manage their cyber-security and other business risks

### **How we use information collected when we perform other activities that form part of the operation of our business**

When we collect personal information as part of performing other activities that form part of our business, we will take reasonable steps to provide clear information about the nature of those activities and how we will use any personal information collected.

We may also use non-personal, de-identified and aggregated information for several purposes including for data analytics, research, submissions, thought leadership and promotional purposes.

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## **How do we use information collected via this Website or through other sources? Do we use it to market goods and services to you?**

We will not use your personal information collected via this Website or through other sources to market the goods and services of third parties to you without first notifying you and seeking your consent (usually through a separate privacy notice).

We may use your personal information collected via this Website:

- To provide you with promotional materials, thought leadership or communications about services provided by us or other HBG member firms that we feel may be of interest to you
- To manage and improve this Website
- To tailor the content of this Website to provide you with a more personalised experience and draw your attention to information about our services that we feel may be of interest to you
- To seek feedback on our services
- For market or other research purposes (however, we will only ever report aggregated results of any research we undertake, and will never include your personal information in those results unless you explicitly give us your consent).

If you do not want to receive marketing materials from us, you can:

- Click on the unsubscribe function in the communication or,
- Email [admin@hbgtax.com.au](mailto:admin@hbgtax.com.au) for any hard copy communications that you no longer wish to receive.

At times, you may choose to register or create a user profile on this Website – for instance, to gain access to specific content, attend a hosted event, respond to a survey, or request communications about specific areas of interest. In such cases, the information you submit will be used to manage your request and to customise and improve this Website and related services offered to you. You may request at any time that we discontinue sending you emails or other communications generated in response to your registration on this Website.

## **Are there any other ways we use your personal information?**

We may also use personal information to protect our rights and those of our users or to comply with a legal or professional right or duty.

## **When will we disclose your personal information?**

We will only disclose your personal information as set out below. Importantly, we will never disclose or sell your personal information to third parties for advertising purposes, or for any other secondary purpose without your authorisation.

We may disclose personal information to:

- Other entities in the HBG Network,
- Third parties that we engage to assist us in providing professional services to our clients or in the operation of our business (i.e. our subcontractors, advisors and suppliers).

Where we disclose your personal information to other entities in the HBG Network, or to third party service providers, we will at all times remain responsible for their handling of that information. This includes taking steps to ensure that those recipients protect that information from unauthorised access, modification or disclosure, and from misuse, interference and loss.

We may also be required to disclose personal information to law enforcement, regulatory or government agencies, or to other third parties:

- To comply with legal or regulatory obligations or requests or,
- Where there is a legal or professional right or duty to disclose.

We may share non-personal, de-identified and aggregated information with third parties for several purposes, including data analytics, research, submissions, thought leadership and promotional purposes.

## **Online Services & Social Media**

### **Blogs, forums, wikis, and other social media**

This Website hosts various blogs, forums, wikis, and other social media applications or services that allow you to share content with other users (collectively 'social media applications'). Importantly, any personal information that you contribute to these social media applications can be read, collected and used by other users of the application. We have little or no control over these other users and, therefore, we cannot guarantee that any information that you contribute to any social media applications will be handled in accordance with this Statement.

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## Security of your information

### How do we protect your information?

We hold personal information in hard copy and electronic formats. We use a range of physical, operational and technological security measures to protect this information. These measures include:

- Staff education and training to ensure our staff are aware their privacy obligations when handling your personal information,
- Administrative and technical controls to restrict access to personal information to only those people who need access,
- Technological security measures, including fire walls, encryption and anti-virus software,
- Physical security measures, such as staff security passes/ keys to access Heaney Business Group premises, laptop cable locks and the use of privacy screens where appropriate.

### Accessing and correcting your personal information

You may request access to, or correction to, personal information that we hold about you. We will give you access to, or correct, your personal information unless there is a lawful reason for refusing your request for access or correction. If we refuse your request, we will give you a written notice explaining our reasons for that refusal and how you may complain about that refusal.

## Changes to this Privacy Policy

This Privacy Policy is not a static document. We may make changes to this Privacy Policy from time to time for any reason. We will publish any updated Privacy Policy on our website.

## Complaints

### How do we handle complaints that we receive?

We are committed to providing clients whose personal information we hold, a fair and reasonable system for the handling of their complaints. If at any time you have any complaints in relation to privacy, please contact our Privacy or Complaints Officer in writing. We will address any concerns you have through our complaints handling process. We will endeavor to respond to your complaint within 7 business days.

### What if you are not satisfied with how we have handled your complaint?

If you believe that Heaney Business Group has not adequately handled your privacy complaint, you may complain to the Office of the Australian Information Commissioner (OAIC) whose contact details are as follows:

Office of the Australian Information Commissioner (OAIC)  
GPO Box 5218  
Sydney NSW 2001  
+61 1300 363 992  
[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## Contact Us

### Privacy Officer

Nicole Jarrett  
[njarrett@hbgtax.com.au](mailto:njarrett@hbgtax.com.au)

### Complaints Officer

Gemma Heaney  
[gheaney@hbgtax.com.au](mailto:gheaney@hbgtax.com.au)

### Address

Unit 7, 12 Belgravia Terrace  
Rockingham WA 6168

### Postal

PO Box 366  
Rockingham WA 6968

### Contact

P: 08 9594 1963  
E: [admin@hbgtax.com.au](mailto:admin@hbgtax.com.au)  
W: [www.hbgtax.com.au](http://www.hbgtax.com.au)

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