



Johnson Breward Brown Pty Ltd

ABN 77 009 522 892

Privacy Policy

Issued

2020

1.1 Purpose

As an accounting services provider, Johnson Breward Brown Pty Ltd (**JBB**) recognises the importance of privacy and is committed to the management and handling of Personal Information and Sensitive Information in an open and transparent way. JBB is required to comply with the Australian Privacy Act 1988 (Cth) (**Privacy Act**) and this policy creates a framework to ensure that any Personal Information JBB holds is collected, used, stored and disclosed in accordance with the Australian Privacy Principles in the Privacy Act.

Your Personal Information is held securely in accordance with this Privacy Policy and privacy laws and is treated with respect and care. You have the right to contact us to access or correct your Personal Information. We encourage you to contact us if you have questions or concerns about your privacy or how your Personal Information is handled by JBB.

1.2 Scope

This Privacy Policy documents the handling of Personal Information by and on behalf of JBB. This policy does not apply to the handling of Personal Information about JBB employees.

1.3 Regulatory Environment

As an accounting services provider which deals with Personal Information and Sensitive Information, JBB has an obligation to respect the privacy of individuals and to follow the Australian privacy laws, which include:

- the Privacy Act 1988 (Cth) (as amended from time to time);
- the National Privacy Principles contained in Schedule 3 to the Privacy Act or where applicable, the Australian Privacy Principles contained in Schedule 1 of the Privacy Act;
- all other applicable laws that require a person to observe privacy or confidentiality obligations in respect of Personal Information.

Please notify JBB in writing if you are currently, or in the future become, a resident of the European Union, so that JBB can assess whether any Personal Information it holds falls within the scope of the GDPR.

2.1 Personal Information Collected and Held by JBB

JBB may collect and hold information about individuals who may be clients and client employees and associates, members of the general public, job applicants, business contacts.

The information JBB typically collects and holds is detailed below.

2.1.1 Members of the Public

- Information obtained when you access JBB's websites
- Information such as name, address, phone number and email address when you attend trainings and public workshops

2.1.2 JBB Clients

JBB collects information from its clients either directly or from client's other advisors or service providers such as banks, insurance agents, lawyers, as well as the client's associates such as parents or spouse.

Examples of client information which JBB typically collects and holds includes:

- Name
- Contact information - addresses, email address, telephone number(s)
- Date of birth
- Tax file number
- ABN
- Bank account and credit card details
- Income tax returns
- Employment details
- Health insurance fund details
- Financial information, including credit card details and details of assets and borrowings/liabilities
- Wills
- Driver's licence/passport
- HIN or SRN for share trading
- Superannuation fund details
- Business contracts

2.1.3 JBB Client Related Parties

Due to the nature of services provided to clients, JBB also holds personal information relating to persons and entities associated with JBB's clients. Examples of typical personal information collected are listed below.

Employees of clients:

- Name
- Contact information - addresses, email address, telephone number(s)
- Date of birth
- Tax file number
- Bank account details
- Employment details
- Health insurance fund details
- Financial information
- Superannuation fund details

Family members and Business Associates of clients:

- Name
- Contact information - addresses, email address, telephone number(s)
- Date of birth
- Tax file number
- ABN
- Bank account details
- Income tax returns
- Employment details
- Health insurance fund details
- Wills
- Driver's licence/passport
- Superannuation fund details
- Business contracts
- Financial information, including credit card details and details of assets and borrowings/liabilities

2.1.4 Business Contacts

The types of Personal Information JBB collects from business contacts may include:

- Name
- Contact information of business and business employees - business address, business telephone number(s) and email address(es)
- Dealings with JBB in respect of general business relationships
- Work, professional and employment references, reports and assessments
- Information from public domain websites
- Information obtained when you access JBB's websites

2.1.5 Job Applicants

The types of Personal Information JBB collects from job applicants, including for both employment and contract positions, may include:

- Employment history
- Qualifications
- Residential address
- Date of birth
- Opinions about suitability for employment from referees and previous employers

Job applicants have the right to not disclose Personal Information, however JBB may not be able to assess a candidate's suitability for employment when it does not receive all necessary information. JBB will only disclose the Personal Information of job applicants to third parties with the consent of the job applicant, or as otherwise permitted in limited circumstances by law.

JBB will use the initial information collected in order to assess a candidate's suitability for an employment role. Once a position has been filled, all applications received by JBB are filed and kept in JBB's human resources files.

The following additional information may be collected from successful applicants prior to the commencement of employment, however this will not be retained in the event the candidate does not ultimately commence employment with JBB:

- Taxation, banking and superannuation fund details
- Information from public domain and social media websites
- Driver's licence/passport details
- Emergency contact and medical details

3.1 How Will JBB Collect Your Personal Information

Wherever possible, JBB will collect Personal Information about you directly from you. Nevertheless, on some occasions JBB may collect your Personal Information from other sources, such as:

- Third party agents or data providers
- Public domain websites on the Internet
- Electronic communications such as articles and information pieces in which you feature
- Publicly available directories and listings such as telephone directories
- Newspapers, magazines, professional journals and the electronic media
- The date, time and domain from which you access JBB's website
- Your personal interactions and/or communications with JBB employees
- Client's other advisors or service providers such as banks, insurance agents, lawyer
- Client's associates such as parents or spouse

Personal information about you which JBB collects and holds may vary depending on your particular interaction with JBB and will be for a legitimate business purpose. JBB will not collect Sensitive Information about you, such as information about your health or ethnicity without your consent.

3.2 Collection of Personal Information Through JBB's Website

JBB's website provides for direct input of Personal Information under some circumstances. In addition, JBB's websites may make use of 'cookies' which are small text files that are stored in the visitor's local browser cache. This enables recognition of the visitor's browser to optimise the website and simplify its use. Most browsers are set up to accept these cookies automatically, however you can deactivate the storing of cookies or adjust your browser to inform you before the cookie is stored on your computer. Data collected via cookies will not be used to determine the personal identity of the website visitor.

JBB may use web analytics, including analysis by third party service providers, which may use IP addresses. While this may in some circumstances be 'Personal Information' neither JBB nor the service providers have any interest in an individual's browser activities and will not use the information to take any action targeted to individuals without having obtained that person's consent.

3.3 How Will JBB Hold and Use Your Personal Information

JBB stores your personal information in hard copy documents or as electronic data in our software IT systems (and those of our service providers). JBB is committed to keeping your personal and sensitive information secure.

Accounting and Practice Management Software

- Information relating to third parties with which JBB conducts business will be held on JBB's secure accounting software platform. This information will be accessed and used in the ordinary course of conducting business, including but not limited to communicating with you, provision of accounting services, responding to enquiries or complaints.
- JBB client financial information is inputted into and stored on accounting software, including MYOB, XERO, Class, MyWorkpapers and QuickBooks. This is backed up onto a local server held on premises, however data is progressively moving to the Cloud via the various accounting software providers, the servers of which are currently located in Australia.

Clients and client associates

In addition to the uses of Personal Information specified in the Accounting and Practice Management Software section, JBB may use your information as follows:

- To provide you with information and advice relevant to your finances and/or your business
- To assist you to manage your financial and tax affairs
- To manage the financial and tax affairs of those of your business associate or relatives which are existing clients
- To involve you in training and support relevant to your situation and/or your business

Other Use and Disclosure

JBB may disclose information about you in the course of any of the uses described above, including to related businesses and third-party service providers for routine business purposes including order delivery, hosting, data processing and validation, data storage or archiving, printing and mailing. JBB will use only reputable service providers and will ensure that it enters into appropriate contractual provisions with service providers to safeguard your privacy.

JBB will otherwise only disclose Personal Information about you to a third party where required by law.

4.1 Data Security

JBB uses technical and organisational security precautions to protect your data from misuse, interference or loss and from unauthorised access, modification or disclosure. JBB's security procedures are revised from time to time based on new technological developments.

In the event of an actual or suspected data breach, JBB will follow the procedures outlined in its Mandatory Data Breach Response Plan, including

- containing the data breach
- conducting a risk assessment to assess the severity rating of a suspected or known data breach
- assessing whether an Eligible Data Breach has occurred.

If an Eligible Data Breach has occurred, JBB may report the data breach to third parties such as:

- JBB's financial services provider
- police or law enforcement bodies
- the Australian Securities & Investments Commission (ASIC)
- the Australian Taxation Office (ATO)
- the Australian Transaction Reports and Analysis Centre (AUSTRAC)
- the Australian Cyber Security Centre (ACSC)
- Commonwealth, State or Territory Privacy and Information Commissioners
- professional associations and regulatory bodies
- insurance providers.

JBB will contact you if you have been personally impacted by an Eligible Data Breach.

4.2 Data Retention

JBB's practice is to maintain clients records in its Accounting and Practice Management system. Personal Information which is no longer actively used will be archived, but can still be accessed if required.

4.3 Data Access and Correction

You may request access to Personal Information JBB holds about you at any time. If you believe your Personal Information is inaccurate, out of date, incomplete, irrelevant or misleading, you may request to have it corrected.

Requests to access or correct Personal Information should be sent to the Privacy Officer. Please provide as much detail as possible to assist in the location of information JBB may be holding about you, such as your name, contact details, any former name(s), and if possible the context, for example, your relationship with JBB. Please specify if you are seeking access to specific Personal Information.

JBB will respond to your request within 30 days of receipt or within any further time notified to you in writing.

4.4 Deletion of Data

You may notify JBB at any time if you do not wish JBB to retain your Personal Information. JBB will comply with all such requests wherever practicable and lawful.

5.1 European General Data Protection Regulation (GDPR)

If you are a European resident, JBB may be subject to GDPR in relation to Personal Information it holds about you. Although many of the privacy principles of the GDPR are similar to the Privacy Act and other Australian privacy laws, there are some differences. Accordingly, we request that you notify us if you are a European resident when you transfer your Personal Information to us or if you are aware that we are collecting your Personal Information. Your Personal Information will still be subjected to the same information security standards as are applied to all Personal Information held by JBB, however, we may manage your Personal Information in a different manner to take account of data portability entitlements and other GDPR-specific requirements.

6.1 Complaints

All complaints regarding your Personal Information should be made in writing to JBB's Privacy Officer.

JBB will respond to your complaint within 30 days of receipt of your correspondence or within any further time notified to you in writing.

If you are not satisfied with the outcome of the response you receive, we can refer you to the Office of the Australian Information Commissioner (as applicable) for further investigation.

6.2 Privacy Officer contact information

All requests relating to access, correction or deletion of Personal Information, or any other information relating to JBB's Privacy Policy should be made in writing to:

*The Privacy Officer
Johnson Breward Brown Pty Ltd*

*Level 1, 10 Cameron Street
PO Box 1003*

Launceston Tasmania 7250
 Australia

Email privacy@johnsonbrewardbrown.com.au

Phone 03-6331 4244

7.1 Definitions

Term	Definition
JBB	Johnson Breward Brown Company
Confidential Information	Information that is not known to, or readily accessible by, the public and disclosure of that information would cause harm to or disadvantage a person or organisation. Access and disclosure of Confidential Information must be controlled and will only be given to persons who require access to perform their duties.
Data Breach	An incident, in which Personal Information or Confidential Information is lost or subjected to unauthorised access, modification, disclosure, or other misuse or interference.
Eligible Data Breach	A Data Breach which has caused serious harm to an individual requiring notification under the Notifiable Data Breaches Scheme under the Privacy Act.
GDPR	General Data Protection Regulation, the equivalent to the Australian Privacy Act in the European Union, which took effect in May 2018 and has been enacted individually in member countries.
Personal Information	Any information or an opinion about an identified individual, or an individual who is reasonably identifiable, as defined in the Privacy Act.
Privacy Act	Privacy Act 1988 (Cth).
Sensitive Information	Personal Information categorised as Sensitive Information under the Privacy Act, including but not limited to financial records.