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FLINDERS

Policy Document

Reviewed June 2026

PRIVACY POLICY



1. Flinders Accountants Pty Ltd as trustee for Flinders Trust, Flinders Financial Services Pty Ltd, Flinders Finance (WA) Pty Ltd and Flinders Superannuation Services Pty Ltd ('Flinders') abides by the Australian Privacy Principles established under the Privacy Act 1988 and Privacy Amendment (Privacy Enhancement) Act, 2012.

Under the following Australian laws, we may be authorised or required to collect your personal information:

- Corporations Act 2001,
 - Australian Securities and Investments Commission Act 2001,
 - Anti Money Laundering and Counter Terrorism Financing Act 2006,
 - Taxation Administration Act 1953,
 - Superannuation Guarantee (Administration) Act 1992 and
 - Superannuation (Unclaimed Money and lost members) Act 1999
2. A summary of the Australian Privacy Principles is available on the website of the Office of the Australian Information Commission, www.oaic.gov.au.
 3. This policy applies to Flinders, its employees and its representatives.
 4. As an accounting and administration services organisation with an Australian Financial Services Licence we are subject to certain legislative and regulatory requirements, which necessitate us obtaining and holding detailed information, which personally identifies a client and/or contains information or an opinion about a client ("personal information"). Our ability to provide clients with comprehensive advice and service is dependent on us obtaining certain personal information about those clients, including but not limited to:
 - (a) Employment details and employment history;
 - (b) Details of their current financial circumstances, including assets and liabilities (both actual and potential), income, expenditure, insurance cover and superannuation;
 - (c) Information about their employment history, employment circumstances, family commitments and social security eligibility;
 - (d) Personal information about family and dependants.
 5. When collecting personal information we may collect government identifiers such as tax file numbers or Medicare numbers. We will destroy or de-identify these numbers if they are not required for any authorised purpose.
 6. Failure to provide the personal information referred to above may expose a client to higher risks in respect of the recommendations made to that client and may affect the adequacy or appropriateness of advice we give to that client. If a client elects not to provide us with the personal information referred to above, we may elect to terminate our retainer with the client if we believe we are unable to provide the client with a complete service. From time to time other Acts may require or authorise us to collect a client's personal information.
 7. We will not collect any personal information about a client except when that client has knowingly provided that information to us or authorised a third party to provide that information to us. However, there may be times where we may collect information about a client from a third party and the client will not be aware of it but the information will be necessary for us to provide the required service such as from an employer where they are already an existing client.
 8. A client has the right to interact anonymously or under a pseudonym. This is not practical with accounting and financial services as the services are personal and a client's identity must be verified before any accounting or taxation and financial services are implemented. If a client is making a general enquiry about a product or service though the client does not need to tell us who they are.
 9. Generally, collection of a client's personal information will be effected in either face-to-face interviews or over the telephone or by way of written communication either mail or email or an online client engagement form. From time to time additional and/or updated personal information may be collected through one or more of those methods.
 10. We will only collect, maintain and use Personal Information about a client if it is necessary for us to adequately provide the services that client has requested including:
 - (a) The preparation of the financial statements and tax returns;
 - (b) The provision of accounting or taxation services and appropriate financial advice to that client as requested by them or from time to time as we believe appropriate;
 - (c) Reviewing their financial and accounting and taxation affairs;
 - (d) Respond to client's requests and to maintain in contact with the client.
 - (e) To notify clients of the services we offer or events we may be holding.
 - (f) For internal training purposes.



- (g) Assist you to prepare an application for financial products, a lease or a loan.
 - (h) To recommend the potential acquisition of a financial product as defined under the Corporations Act and under the authorisations of Flinders Financial AFSL.
11. We will not use or disclose Personal Information collected by us for any purpose other than:
- (a) The purposes for which it was provided or secondary related purposes in circumstances where the client would reasonably expect such use or disclosure; or
 - (b) Where the client has consented to such disclosure; or
 - (c) Where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.
12. A client's personal information is held in that client's file or within our computer systems database
13. All computer based information is protected through the use of a firewall, encryption, anti virus software and access passwords on each server and computer. Data is backed up each evening and stored securely off site. Our servers are located on our premises however we engage third party external IT service providers to carry out functions including backups and recovery and these providers can log in remotely. These providers are bound under our service agreement for both confidentiality and privacy.
14. In order to ensure that a client receives a personal and tailored service, the client's Personal Information may be transferred to one of related entities within the group, namely Flinders Accountants Pty Ltd as trustee for Flinders Trust, Flinders Superannuation Services Pty Ltd, Flinders Financial Services Pty Ltd or Flinders Finance WA Pty Ltd. It is a condition of our agreement with each of our representatives that they adopt and adhere to this privacy policy. We may outsource part of our administration and paraplanning functions to affiliated companies to assist in the provision of services and where necessary, may disclose your personal information to our associated service providers.
15. We may engage third parties on client's behalf, strictly in providing our professional services to our clients. In such circumstances they may be provided with some limited access to a client's personal information. For example a lawyer who we engage on behalf of our clients to undertake specific work related to the clients circumstances.
16. We also use cloud hosted and cloud based software such as Xero, that contains your personal and financial information. These providers have privacy policies that are consistent with the Australian Privacy Principles.
17. Some of these providers may also reside overseas. If that country does not have the same requirements as Australia, we will require an undertaking from the entity that it will comply with the Australian Privacy Principles and take steps to ensure those recipients protect that information from any misuse, or disclosure.
18. As our representatives are members of a number of Professional Industry Bodies. Those bodies may inspect our files to assess that member's compliance with the Rules of Professional Standards of that Body. This may involve the disclosure of your personal information. We are also obliged to make those records available for inspection by the Institute of Chartered Accountants in Australia however we will notify you in the event your records are requested. In addition, we must make our files available to the Australian Securities and Investments Commission and any relevant court in the State of Western Australia, should they be specifically requested.
19. We may use the personal information collected from a client for the purpose of providing that client with direct marketing material such as articles that may be of interest to the client, however the client may, by contacting us by phone or email or in a face to face meeting, request not to receive such information and we will give effect to that request. We will action a client's request promptly. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times a client's personal information is treated as confidential and any sensitive information is treated as highly confidential. All record movements off premises are recorded in a central register. Access to our premises is controlled. Some historical records are held off the business premises in a secured location.
20. To comply with our obligations under the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and associated Rules, we may collect, verify and retain information relating to your identity, beneficial ownership, source of funds, source of wealth, controllers and related parties. We may utilise electronic verification, identity verification and compliance screening platforms to assist with customer due diligence, including identity verification, sanctions screening, politically exposed person (PEP) screening and other risk-based checks required by law. Information collected for AML/CTF purposes may be disclosed to service providers engaged to perform these verification and screening activities on our behalf. These providers are required to maintain appropriate privacy, confidentiality and



information security controls and comply with applicable Australian privacy requirements. Where electronic verification services are utilised, personal information may be securely transmitted, processed and stored for identity verification and compliance purposes. We take reasonable steps to ensure that any third-party provider engaged maintains information security standards appropriate for the protection of personal information and complies with relevant Australian privacy obligations. We may retain AML/CTF records, including identification documents, verification results, screening outcomes, customer due diligence records and risk assessments, for a minimum of 7 years. Flinders may use artificial intelligence (AI) technologies to assist in delivery of our services, including but not limited to data analysis, document drafting and client communications. These tools are used to enhance efficiency, accuracy and service quality. When using AI tools with personal information, we ensure that any personal data processed by AI systems is handled in accordance with the Privacy Act and Australian Privacy Principles (APPs), sensitive personal information is not input into publicly available AI platforms, AI-generated insights or summaries that contain personal information are treated with the same level of confidentiality and protection as other data. We maintain human oversight over all AI-assisted processing. AI systems may occasionally produce inaccurate or incomplete outputs. We take reasonable steps to verify the accuracy of AI-generated information before using it in decision making.

21. Cookies may be placed on your computer by the Flinders website to assist in functionality of that website. You can disable these cookies and remove them from your browser history at any time.
22. Flinders complies with the provisions of the Spam Act 2003 when sending commercial electronic messages.
23. Flinders use social media to share content and knowledge. You acknowledge any personal information you share over social media is available to other users over which Flinders have no control.
24. Flinders uses electronic signing platforms. We do not verify the signature upon receipt of signed documents and it is the responsibility of the individual to satisfy themselves of the security controls and integrity over the electronic signature process utilised by them. The client remains responsible for reviewing all documentation prior to execution.
25. In the event that a client ceases to be a client of this organisation, any personal information which we hold about that client can be held in order to comply with legislative and professional requirements, following which time the information will be destroyed.
26. Flinders respect the privacy of children and our website is not directed at children under the age of 13. We will not collect or maintain information of anyone under the age of 13 unless as a part of a specific engagement.
27. A client may at any time, by contacting us, request access to their personal information and we will reasonably provide access to that information for the client either by providing him or her with copies of the information requested, allowing him or her to inspect the information requested or providing him or her with an accurate summary of the information held.
28. We will endeavour to ensure that, at all times, the personal information about a client, which we hold is up to date and accurate. In the event that a client becomes aware, or believes, that any Personal Information which we hold about them is inaccurate, incomplete or outdated, the client may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or out datedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information. We must retain historical information to support the services we provided at a point in time.
29. Some personal information we hold is 'sensitive' and subject to greater restrictions. Sensitive information relates to a person's racial or ethnic origin, political opinions or membership of political bodies, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or activities, criminal record, state of health and medical history.
30. In the unlikely event of an eligible data breach Flinders will promptly contain and evaluate the breach and notify the individual and the Commissioner if required.
31. If a client wishes to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, the client should contact us by any of the methods detailed below and request that the complaint be directed to the Compliance Manager. The complaint will be considered within 10 days and responded to. It is our intention to use our best endeavours to resolve any complaint to the client's satisfaction, however, if the client is unhappy with our response, the client is entitled to contact the Office of the Australian Information Commissioner who may investigate the complaint further.



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32. Please refer to the [fact sheet](#) published by the Tax Practitioners Board (TPB) summarising your obligations to the ATO and your tax practitioner, and your tax practitioner's obligations to you, the TPB and ATO.

CONTACT DETAILS

The Privacy Officers

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