

# Privacy Policy

## 1. Introduction

Navigate Accounting Solutions is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Cth)(Privacy Act). This commitment is demonstrated in this policy. The Privacy Act incorporates the Australian Privacy Principles (APPs). The APPs set out the way in which personal information must be treated.

This Privacy Policy sets out how Navigate Accounting Solutions handles personal information.

This policy applies to any person for whom we currently hold, or may in the future collect, personal information.

This Privacy Policy does not apply to personal information collected by Navigate Accounting Solutions that is exempted under the Privacy Act, for example employee records.

In this Privacy Policy, Navigate Accounting Solutions, 'we', 'us' and 'our' is a reference to Navigate Accounting Solutions and includes any entity carrying on business in Australia that forms part of the Navigate Accounting Solutions group of entities.

Navigate Accounting Solutions may modify this Privacy Policy from time to time to reflect its current privacy practices.

## 2. Personal information we collect

Generally, the types of information that we may collect and hold include:

- (a) Names, job titles, contact and address details;
- (b) Information in identification documents (e.g. passport, driver's licence);
- (c) tax file numbers and other government-issued identification numbers;
- (d) Date of birth and gender
- (e) Bank account details, shareholdings and details of investments;
- (f) Details of superannuation and insurance arrangements;
- (g) Visa or work permit status;
- (h) Personal information about your spouse and dependants;
- (i) Financial information;

- (j) Business circumstances;
- (k) Family circumstances;
- (l) Information about assets and investments;
- (m) Information otherwise required by law; and
- (n) Any other personal information required to perform the accounting and taxation service to the individual.

It may be necessary in some circumstances for Navigate Accounting Solutions to collect sensitive information about you in order to provide specific services, examples of the types of sensitive information that may be collected in such circumstances include professional memberships, ethnic origin, criminal record and health information.

We will not collect sensitive information without the individual's consent to which the information relates unless permitted under the Privacy Act.

It is generally not practical to remain anonymous or to use a pseudonym when dealing with Navigate Accounting Solutions as usually we need to use your personal information to provide specific services to you or which relate to or involve you.

## **3. How we collect and manage personal information**

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

Generally we collect your personal information from you directly (e.g. when we deal with you in person or over the phone, when you send us correspondence (including via email), when you complete a questionnaire, form or survey).

However, we have a large referral network and also collect personal information from numerous other sources. It is not possible to provide an exhaustive list of these sources, but they may include:

- (a) Professional advisors or agents for individuals who we act for;
- (b) Banks and financial institutions;
- (c) Government bodies;
- (d) Insurance companies'
- (e) Businesses about their employees, contractors, customers or suppliers;
- (f) Barristers and other solicitors;
- (g) Feedback surveys; and

(h) From paid search providers.

### ***3.2 Where you provide us with personal information about someone else***

Where you provide us with personal information about someone else, you should only do so if you have their authority or consent to provide us with their personal information. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy or any Privacy Collection Statement we give you.

### ***3.3 Holding personal information***

We hold your personal information either:

(a) physically,

- i. on our premises; and/or
- ii. at a third party specialist provider of records and document management services.

(b) Electronically,

- i. Through internal servers and websites and a private cloud;
- ii. On electronic storage devices;
- iii. By a third party data storage provider in Australia;
- iv. By an off-site replication provider in Australia; and
- v. By an external email filtering host based in Australia.

#### Overseas Disclosures

We may also back-up your personal information on servers that are located overseas through third party service providers. These servers are commonly located in the United States of America, Singapore and New Zealand.

We will take all reasonable steps to ensure that all personal information we, including third party service providers, hold is secure from any unauthorised access, misuse or disclosure. However, we do not guarantee that personal information cannot be accessed by an unauthorised person (e.g. a hacker) or that unauthorised disclosures will not occur.

### ***3.4 The purpose for collecting holding using and disclosing personal information***

Navigate Accounting Solutions collects, holds and uses personal information for a number of purposes including:

- (a) to provide professional services;
- (b) to provide technology services and solutions;
- (c) to respond to requests or queries;
- (d) to maintain contact with our clients and other contacts;
- (e) to keep our clients and other contacts informed of our services and industry developments;
- (f) for administrative purposes;
- (g) when engaging service providers, contractors or suppliers relating to the operation of our business;
- (h) to manage any conflict of interest or independence obligations or situations;
- (i) for seeking your feedback;
- (j) to meet any regulatory obligations;

or

- (o) for any other business related purposes.

If you do not provide us with the personal information we have requested, we may not be able to complete or fulfil the purpose for which such information was collected, including providing you or our clients with the services we were engaged to perform.

The types of third parties to whom we may disclose your personal information include:

- (a) experts or other third parties contracted as part of an engagement;
- (b) our service providers
- (c) our professional advisers, including solicitors, valuers or other accountants;
- (d) as part of an engagement, if you are a client, an employee, a contractor or supplier of services to one of our clients, then we may disclose your personal information as part of providing services to that client;
- (e) as part of an actual (or proposed) acquisition, disposition, merger or de-merger of a business (including Navigate Accounting Solutions business) or to enter into an alliance, joint venture or referral arrangement; or
- (f) government or regulatory bodies or agencies, as part of an engagement or otherwise, (for example, the Australian Taxation Office).

We do not disclose personal information to third parties for the purpose of allowing them to send marketing material to you.

### *3.5 Disclosure of personal information overseas -*

We may store, process or back-up your information on external servers based in Australia. These external server providers may or may not host these functions overseas.

In some circumstances, Navigate Accounting Solutions also uses third party service providers to carry out its functions and provide services. These service providers may be members of our international association around the world.

## **4. Privacy of our Website**

### ***4.1 Your choices***

You have several choices regarding your use of Navigate Accounting Solutions 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 and/or other information, provision of certain personal information will generally be required.

### ***4.2 Links to third party websites***

Navigate Accounting Solutions website may contain links to third parties' websites. Those other websites are not subject to our privacy policy and procedures. You will need to review those websites to view a copy of their privacy policy. Navigate Accounting Solutions also does not endorse, approve or recommend the services or products provided on third party websites.

## **5. Children**

We understand the importance of protecting children's privacy, especially in an online environment. In particular, our website is not intentionally designed for or directed at children under the age of 13. It is our policy to never knowingly collect or maintain information about anyone under the age of 13, except as part of a specific engagement to provide professional services which necessitates such personal information be collected or for the purposes of ensuring compliance with our independence policies.

## **6. Gaining access to personal information we hold**

You can request access to your personal information, subject to some limited exceptions permitted or required by law. Such request must be made in writing to the Privacy Officer. Please see the How to contact us' section for details.

Navigate Accounting Solutions may charge reasonable costs for providing you access to your personal information.

We may deny access to personal information if;

- (a) The request is impractical or unreasonable;
- (b) Providing access would have an unreasonable impact on the privacy of another person;
- (c) Providing access would pose a serious and imminent threat to the life or health of any person; or
- (d) There are other legal grounds to deny the request.

## 7. Keeping personal information current

It is important the information we hold about individuals is up-to-date. Individuals should contact us if their personal information changes.

If you believe that any personal information Navigate Accounting Solutions has collected about you is inaccurate, not up-to-date, incomplete, irrelevant or misleading, you may request correction. To do so, please contact the Privacy Officer and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act. Please see the 'How to contact us' section for details as to how to contact the *Privacy Officer*.

## 8. Complaints

If you wish to make a complaint to Navigate Accounting Solutions about our handling of your personal information, you can contact the Privacy Officer as set out in the 'How to contact us' section. You will be asked to set out the details of your complaint in writing in a form provided.

Navigate Accounting Solutions will endeavour to reply to you within 30 days of receipt of the completed complaint form and, where appropriate, will advise you of the general reason for the outcome of the complaint. In some circumstances, the Privacy Officer may decline to investigate the complaint, for example if the complaint relates to an act or practice that is not an interference of the privacy of the person making the complaint. If you are not satisfied with the outcome of your complaint, you can refer your complaint to the office of the Australian Information Commissioner.

## 9. How to contact us

**If you have a query in relation to this Privacy Policy, access or correct your personal information or to make a complaint about Navigate Accounting Solutions handling of your personal information, please contact us as follows:**

Privacy Officer  
Navigate Accounting Solutions  
PO Box 117  
KYOGLE NSW 2474

Email: [admin@navigatesolutions.com.au](mailto:admin@navigatesolutions.com.au)

# Disclaimer

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The information contained in this site is general and is not intended to serve as advice. No warranty is given in relation to the accuracy or reliability of any information. Users should not act or fail to act on the basis of information contained herein. Users are encouraged to contact **Navigate Accounting Solutions** professional advisers for advice concerning specific matters before making any decision"