COOPER PARTNERS' PRIVACY POLICY

Cooper Partners understands the importance of ensuring the responsible use of personal information collected. We consider your privacy to be one of our most important responsibilities and Cooper Partners Pty Ltd and Cooper Partners Financial Services Pty Ltd have created this privacy policy ("Privacy Policy") in order to demonstrate our firm commitment to your privacy.

Cooper Partners ("CP") refers to its Tax, Superannuation and Accounting Practice and its controlled entities, including Cooper Partners Financial Services Pty Ltd, an Australian Financial Services licensed entity wholly owned by Cooper Partners Pty Ltd.

We are bound by the thirteen 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 designed to ensure that personal information is protected from the time the information is collected through to its destruction. The APPs also give you the right to access your personal information and have it corrected if it is incorrect.

We take our obligations under the APPs, Australian State and Territory privacy legislation and other applicable data protection laws seriously. Therefore, in addition to this statement, we also:

- Maintain an internal privacy policy;
- Where appropriate, include terms in our agreements with our clients that describe how we handle personal information during the delivery of our professional services; and
- Have a clear policy on document/data destruction.

Where we refer to "personal information", this means information which identifies an individual or from which an individual's identity can be reasonably ascertained. In some circumstances, including where it is necessary for the conduct of your matter, we may need to collect sensitive information. Sensitive information is defined in the Privacy Act.

CP will update this Privacy Policy as required. If it is changed, the changes will be posted at www.cooperpartners.com.au so that you are always aware of the sort of information collected, how the information may be used, and under what circumstances it may be disclosed by CP.

We may also use or disclose your personal information to protect our rights and/or obligations to comply with a legal or professional right or duty.

Depending on the type of service being provided to you, prior to providing any service, CP may be obliged by law to verify certain personal information provided by you. The Laws governing these requirements include the Anti-Money Laundering and Counter Terrorism Financing Act (2006), Australian Taxation Laws and Australian Corporations Law.

This Privacy Policy does not apply to acts or practices of CP that are directly related to employee records of current or former employees, which are governed by a separate policy document.

What sort of information does CP collect and hold?

In the course of acting for you, CP may collect some personal information. The personal information we collect is limited in most cases to names, professional and contact details, gender, occupation, banking or other financial details and marital status, together with information relating to the services we provide you, including records of any complaints.

Ways in which CP collects personal information

1. We collect personal information in person, in writing, by telephone, by completion of our Tax Organisers, through our website and through other methods of communication. Most of the personal information that we collect is provided to us by you, when you initially instruct us, and during the course of us acting for you.

2. Sometimes we may need to collect personal information from third parties, in the course of providing our services to you, ensuring that information that we have been given is complete and correct, in order to enable you to fulfil your reporting obligations and for us to provide you with complete and accurate advice.

These third parties may include:

- family members for whom we are acting as part of the same engagement;
- other parties to a transaction or with whom you operate a business or maintain investments with;
- other parties' lawyers or accountants; and
- your agents and contractors, including your bookkeepers, finance brokers, financial advisor, banks and other financial providers.

We will seek to obtain your consent prior to requesting any personal information from such third parties, where such consent has not previously been provided.

In each case, we will treat personal information we collect in accordance with the principles set out above.

What Happens If You Do Not Provide the Information?

If you do not provide us with the information requested, we may not be able to fully provide our services to you, or otherwise our advice may be provided based on incomplete facts. In some cases, failure to provide this information may result in misleading statements or disclosures being made for taxation purposes in your income tax returns, which may potentially give rise to tax shortfalls or penalties.

Why Does CP Collect the Information and How Is It Used By CP?

1. CP collects the information to provide you with a specific service. For example, we may use the information you provide us to prepare your annual income tax returns, to arrange for the establishment of company, trust or SMSF structures, provide taxation, accounting, business or superannuation compliance or advisory services, arrange account details, managing tax payment details on your behalf with the Australian Taxation Office, satisfy regulatory requirements, carry out administrative tasks, recruiting, manage our client's rights and obligations in relation to external obligations and statutory obligations and maintaining records with Government agencies such as the Australian Taxation Office and the Australian Securities and Investment Commission.

2. Sometimes in order to supply you with our services, we may disclose your personal information to third parties. These may include our bookkeepers, contractors, insurers, advisors, or your agents, your contractors and organisations with whom we have an alliance or arrangement, and other entities which it is reasonable to expect that information would be provided by in the course of or incidental to the provision of services by us to you. Contractors such as bookkeepers, other specialist advisors, document storage facilities, who have access to personally identifiable information are required to protect this information in a manner that is consistent with this Privacy Policy. These contractors are required to use their access to the personal information for no other purpose than carrying out the services for which they were contracted to perform.

3. CP also uses the information to send you information (either by e-mail or post) that you request. If at any time you receive material that you did not request or do not want to receive such material anymore, see Correcting and Updating Your Profile below.

4. In addition to providing our services to you, we may use and disclose personal information to maintain our relationship with you, to keep you informed of our services, events and other matters which we consider may be of interest to you, and for purposes related to our research, planning, service development, security and risk management. We may also use and disclose personal information to the extent that we are required or authorised by law to do so.

To Whom Does CP Disclose Your Personal Information?

CP will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you unless you consent. We do not provide your personal information to any third-party marketers.

1. Information provided to CP may be provided to related body corporates, and vice versa, to enable us to provide our services to you. Such information will only be used for the primary purpose for which the information was collected.

2. If you are an individual, you authorise us to collect, use and disclose your personal and sensitive information as set out above, including where this may involve a transfer of personal information or of health information outside the State or Territory in which it is held. During the course of providing services to you, we may be required to disclose personal information about you to an overseas recipient, if this is a necessary part of our engagement with you, where a transaction of yours or the engagement has an overseas connection.

3. Other exceptions where we may disclose personal information to third parties are when we are:
   - required by law or for inspection to ensure compliance with mandatory professional standards
   - reasonably necessary to assist a law enforcement agency
   - external service providers for the purposes of independent evaluations of our AML/CTF program, peer reviews, legal advice, consultancy, outsourced administration, issuing statements or handling mail.
   - complying with our legal and regulatory obligations including, but not limited to, our AML/CTF Obligations (which may include lodging an SMR with AUSTRAC).
   - Permitted under the Australian Privacy Principles.

We may use and disclose your Personal Information for any of these purposes. We may also use and disclose your Personal Information for secondary purposes which are related to the primary purposes set out above, or in other circumstances authorised by the Privacy Act.

Sensitive Information will be used and disclosed only for the purpose for which it was provided (or a directly related secondary purpose), unless you agree otherwise, or an exemption in the Privacy Act applies.

How Will CP Keep Your Personal Information Secure?

CP have security measures designed to protect against the loss, misuse and/or alteration of the information under its control. The strictest client confidentiality is maintained by CP at all times with appropriate physical, electronic and managerial procedures in place to safeguard and help prevent unauthorised access or disclosure, maintain data security and protect against loss, misuse or alteration or destruction of information under our control. All personnel working for CP are subject to confidentiality protocols as outlined in their Employment Contract and our Employment Policy Manual.

You should be aware, however, that there are inherent risks in transmitting personal information over the internet. CP does not have control over the transfer of personal data over the internet, and we do not, and cannot, guarantee its security.

We may store your Personal Information and Credit Information in hard copy or electronic format, in storage facilities that we own and operate ourselves, or that are owned and operated by our service providers.

It is our policy to only use third-party service providers that are bound to maintain appropriate levels of data protection, security and confidentiality, and that comply with any applicable legal requirements.

We will destroy or de-identify your personal information when it is no longer required by us or required to be retained by law, whichever is the greater. For more details on our retention policy please contact our Practice Manager.

Our Online Privacy Policy

By using our website, you consent to the collection and use by CP of any personal information provided while using the site. The type of information collected and the use we may make of that information is explained below.

The type of information we receive from you on our website depends on what you do when visiting our site:

- If you access our website, we do not record any information or track links in any way at all.
- If you use the site to contact us by email, we use your personal identifiable information to respond to your inquiry.
- If you request information about the services provided by CP, we will give you the option to decline receiving ongoing marketing communications of this type.
- If you send us a resumé to enquire as to the prospect of employment with CP, or apply online for a position with the firm, we will use that information for that specific purpose only.
- If you contact us by email for any other purpose, the personal information collected from you will only be used for its intended purpose.

Correcting and Updating Your Personal Information

CP gives you the following options for accessing and modifying information previously provided:

1. You may gain access to information that CP have collected about you, by contacting the person named below. We will not charge you for responding to such a request, unless we incur costs in providing the information.

2. Should you require any changes to your personal information, please contact the person named below.

Complaints

You may make a complaint about CP's handling of your personal information, or in relation to your dealings with us about your personal information, by contacting the person named below.

How to Contact Us

If you have any questions about this Privacy Policy, please contact:

Toby Monteath
Practice Manager
P O Box 7027
Cloisters Square
PERTH WA 6850

(08) 6311 6900
(08) 6311 6999
tmonteath@cooperpartners.com.au

or you can register your complaint with the Office of the Australian Information Commissioner:

Website: www.oaic.gov.au
Phone: 1300 363 992
Email: enquiries@oaic.gov.au