



PRIVACY POLICY

Our Commitment

The privacy of our employees, our clients, their files and data is very important to us. Lockhart Business Advisors ('the Company' / 'We') is committed to providing quality services to you, and this policy outlines our ongoing obligations to you in respect of how we manage your Personal Information.

We have adopted the National Privacy Principles (NPPs) contained in the Privacy Act 1988 (Cth) (the Privacy Act). The NPPs govern the way in which we collect, use, disclose, store, secure and dispose of your Personal Information.

A copy of the Australian Privacy Principles may be obtained from the website of The Office of the Federal Privacy Commissioner at www.privacy.gov.au.

Collection and Use of Personal Information

Personal Information is information or an opinion that identifies an individual. Examples of Personal Information we collect include: names, addresses, email addresses, phone and facsimile numbers.

This Personal Information is obtained in many ways including interviews, correspondence, by telephone and email, via our website www.lockharts.com.au, from your website, from media and publications, from other publicly available sources and from third parties. We don't guarantee website links or policy of authorised third parties.

We collect your Personal Information for the primary purpose of providing our services to you, providing information to our clients and marketing. We may also use your Personal Information for secondary purposes closely related to the primary purpose, in circumstances where you would reasonably expect such use or disclosure.

Access to your personal information is restricted to authorized employees and is based on the employees' need to access. Your information is stored on secure premises with databases protected from unauthorized access. We will never disclose your personal information to another person without your consent.

When we collect Personal Information we will, where appropriate and where possible, explain to you why we are collecting the information and how we plan to use it.

If we ask for your personal information and you don't give it to us, we may not be able to provide you with any, some, or all of our services.

Outsourcing and Cloud Storage Arrangements

There is an increasing trend away from paper based records and in-house IT infrastructure. We utilise third party software systems as part of our service delivery to you and we are obliged to make you aware to whom we outsource the electronic transfer and storage of data. These are hosted or cloud providers; currently Xero and Dropbox. Depending on how we choose to most efficiently deal with your data, this may be sent to and stored by these providers. We take all reasonable measures to protect your privacy.

If you would like to know more about how your personal information is collected and stored, Xero's Privacy Policy can be accessed at <https://www.xero.com/au/about/terms/privacy/>, and Dropbox's Privacy Policy can be accessed at <https://www.dropbox.com/privacy>.

Third Parties

Where reasonable and practicable to do so, we will collect your Personal Information only from you. However, in some circumstances we may be provided with information by third parties. In such a case we will take reasonable steps to ensure that you are made aware of the information provided to us by the third party.

Sensitive Information

Sensitive information is defined in the Privacy Act to include information or opinion about such things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

Sensitive information will be used by us only:

- For the primary purpose for which it was obtained
- For a secondary purpose that is directly related to the primary purpose
- With your consent; or where required or authorised by law.

Disclosure of Personal Information

Your Personal Information may be disclosed in a number of circumstances including the following:

- Third parties where you consent to the use or disclosure; or
- Where required or authorised by law.

Security of Personal Information

Your Personal Information is stored in a manner that reasonably protects it from misuse and loss and from unauthorized access, modification or disclosure.

When your Personal Information is no longer needed for the purpose for which it was obtained, we will take reasonable steps to destroy or permanently de-identify your Personal Information. However, most of the Personal Information is or will be stored in client files which will be kept by us for a minimum of 5 years.

Access to your Personal Information

You may access the Personal Information we hold about you to update and/or correct it, subject to certain exceptions. If you wish to access your Personal Information, please contact us in writing.

Lockhart Business Advisors may charge an administrative fee for providing a copy of your Personal Information.

In order to protect your Personal Information we may require identification from you before releasing the requested information.

Maintaining the Quality of your Personal Information

It is important to us that your Personal Information is accurate, complete and up-to-date, thus we will take reasonable steps to ensure this is the case. If you find that the information we have is not up to date or is inaccurate, please advise us as soon as practicable so we can update our records and ensure we can continue to provide quality services to you.

Changes to this Privacy Policy

Lockhart Business Advisors reserves the right to make amendments to this Privacy Policy at any time. An updated policy will be available on our website at all times.

Complaints

If you wish to make a complaint about the Company's privacy practices we request that you first contact the Company with the details of your complaint. Your complaint will be investigated diligently and our response provided to you as soon as reasonably practicable. However, you have the right to complain to the officer of the Privacy Commissioner within Australia either in the first instance or, if you feel the Company has not handled your complaint adequately. A complaint to the Commissioner must be made in writing, but may be contacted for help by ringing the Privacy Commissioner's hotline services in Australia on 1300 363 992. You may also obtain information about the complaint process from www.privacy.com.au.

LOCKHART Business Advisors

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