

DBC Privacy Policy updated 1 April 2022

DBC Advisory Pty Ltd (DBC Advisory) is an independent firm located in Sydney. In this Privacy Policy, 'we', 'us' and 'our' refers to DBC Advisory.

At DBC Advisory, we recognise the importance of protecting and maintaining your personal information. We appreciate that you may have concerns about your privacy and about the security, accuracy and confidentiality of personal information. DBC Advisory is committed to providing you with the highest quality professional service whilst also protecting your privacy. DBC Advisory abides by the Australian Privacy Principles established under the *Privacy Act 1988 (Cth) (Privacy Act)* and subsequent legislation.

This Privacy Policy sets out how DBC Advisory handles personal information that is covered by the Privacy Act. This Privacy Policy is not intended to cover categories of personal information that are not covered by the Privacy Act.

Management of Personal Information

DBC Advisory manages personal information in compliance with the Australian Privacy Principles. If you have any queries or complaints about DBC Advisory's compliance with the Australian Privacy Principles, please contact the Privacy Officer using the 'How to Contact Us' information shown below.

If you believe that DBC Advisory has breached the Australian Privacy Principles, please contact the Privacy Officer in writing. We will respond to you within a reasonable time and in accordance with the requirements of the Privacy Act. If you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner.

Quality of Personal Information

Our goal is to ensure that, at all times, the personal information we collect, hold, use or disclose is up to date, accurate and complete. We will take reasonable steps to correct personal information. If you become aware, or believe, that any personal information we hold is inaccurate, incomplete or out of date, please contact DBC Advisory as soon as you do become aware.

Collection of Solicited Personal Information

Our ability to provide you with a comprehensive service is dependent on us obtaining certain personal information. This may include:

- name and contact details
- details of spouse & dependants
- date of birth and gender
- bank account details
- employment details and employment history
- tax and financial statements
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, investments, insurance cover and superannuation
- documentation used for identification and verification purposes

Some personal information is considered to be 'sensitive information'. It may be necessary in some instances for DBC Advisory to collect sensitive information about you, for example, your Tax File Number, health status, ethnic origin, memberships to professional associations and criminal record.

DBC Advisory will collect information that is reasonably necessary for the primary purpose of providing a professional service to you and also for complying with our legal obligations. If this information is considered sensitive, then unless the law provides otherwise, DBC Advisory will also require your consent to the collection of this sensitive information. We will only collect sensitive information if it is necessary to provide our services to you.

You have a right to refuse to provide us with your personal information or to anonymity or the use of a pseudonym. However, if you do refuse to provide such information, or request the use of anonymity or a pseudonym we may be unable 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.

DBC Advisory will collect personal information in a fair and lawful manner. In most instances, we will collect personal information from you unless it is unreasonable and impracticable to do so. DBC Advisory will not adopt, use or disclose government agency identifiers, for example, Tax File Numbers, as our primary means of identifying you unless it is required or authorised by or under an Australian law or a court/tribunal order, or as required to identify you with the Australian Taxation Office.

Collection, holding, using, and disclosing of personal information:

When we collect, hold, use and disclose personal or sensitive information it must be done through lawful and fair means. Consent must be obtained to collect, hold, use and disclose personal information. We are not required to obtain your consent to collect, hold, use or disclose your personal or sensitive information if the collection is required or authorised by or under an Australian law or a court/tribunal order. There are other exceptions to the requirement of obtaining your consent in accordance with the Australian Privacy Principles. If you would like more information on these requirements, please contact our Privacy Officer.

We use a variety of formats for the collection of personal and sensitive information. These include:

- requiring clients to complete a Client Profile or other forms;
- receipt of emails, letters and other correspondence;
- telephone calls;
- appointments in person;
- publicly available records;
- through a customer's personal representative;
- through use of our website, such as via contact mailboxes or online enquiry forms, or through the registration process

In every circumstance we will attempt to obtain such personal and sensitive information directly from you. If that is unreasonable or impracticable, we will attempt to obtain such information from other sources as described above.

You should only provide us with someone else's personal information where you have their express consent to do so and it is for the purpose of us providing services to you. Matters in this policy should be communicated to any person whose information you collect and provide to us. In providing such information you agree that you have obtained the relevant consent and this is authorised to do so.

There may be circumstances where we are provided with personal information which we did not actively seek. An example may be misdirected mail, or an excess of documents provided to us by clients. In such situations, our Privacy Officer will make a determination on whether we could have obtained the information lawfully in accordance with the Australian Privacy Principles. If the information was not lawfully obtained it will be destroyed or de-identified. We will try to notify the relevant person, whose information has been mistakenly received, if this situation arises.

Security of personal information

Safeguarding the privacy of your information is important to us. We hold personal information in a combination of secure computer storage facilities and paper based files, and take steps to protect the personal information we hold from misuse, loss, interference, unauthorised access, modification or disclosure.

DBC Advisory trains its employees carefully on handling personal information and confidentiality of such information. Once we have no purpose for holding your personal information, we will take all reasonable steps to destroy or de-identify the information.

Disclosure of personal information overseas and sharing personal information amongst the mutually trusted advisors

To meet the purposes for which your personal information has been collected we may disclose your information to others who are mutually trusted including other accountants, lawyers, financial planners and other advisors/consultants.

In some circumstances, DBC Advisory uses third party service providers to carry out part of the services we provide to you. These services providers are typically located in Australia and are also located in India and the Philippines. DBC Advisory will be required to take reasonable steps to ensure that the Australian Privacy Principles are complied with by the overseas recipients of your personal information. We may disclose your personal information to these providers from time to time. When required, your personal information will only be disclosed to an overseas person or business in the following circumstances:

- Where the overseas recipient has signed a contract with us which creates legal obligations to comply with Australian Privacy Law (i.e. the APPs);
- If the recipient is subject to similar privacy law as Australian privacy law, and you are able to personally access avenues to enforce the protection of those laws;
- If you provide written consent for us to disclose the information after we provide you with full information; or
- If the disclosure is required or authorised by or under an Australian law or a court/tribunal order.

DBC Advisory utilises third party providers (such as IT providers and market researchers) for its business and to deliver services to you. It may be necessary for us to disclose non-sensitive personal information to these providers from time to time. Such disclosure will be in accordance with this Privacy Policy and the APPs.

The DBC Advisory website uses Google Analytics or other third party software to analyse aggregate user behaviour. Google Analytics and such other software uses first party cookies, which are text files placed on your computer for the purpose of anonymously identifying your session. These cookies are not used to grant DBC Advisory access to your personally identifiable information. Non-identifiable information (such as the pages you visit) may be tracked. By directing your browser to delete your cookies, this data will be erased. For more information about Google Analytics, please follow the links provided on our website. The information is collected using first party cookies, meaning that only DBC Advisory is able to access your information. Your information may be aggregated with information from other users for the purpose of improving our website and offerings. We will not associate any

data gathered from our website with any personally identifiable information, unless you explicitly submit that information (e.g. your email address) via our online information form. Any links to third party websites on the DBC Advisory website are not covered by our privacy policy.

Direct marketing

DBC Advisory may use or disclose the personal information we hold about you for the purpose of direct marketing, such as articles that may be of interest to you, if there is a reasonable expectation that your personal information will be used for this purpose and you have not opted out of receiving direct marketing communications from us, or where you have provided your consent.

If you do not wish to receive these materials, please contact our privacy officer.

Access to personal information

You have the right to access any personal information regarding you that DBC Advisory holds. This is subject to some limited exceptions, which the Privacy Officer can provide further information on. Such requests should be made in writing to the Privacy Officer. We will acknowledge your request within 14 days and respond to it within a reasonable time. DBC Advisory may charge a fee only to cover the cost of locating, retrieving, reviewing, and copying any material requested. We will not charge any fee to make the request or to for us to give effect to the request. If your request is approved, we will provide you with access to the information in the manner requested if it is reasonable and practicable to do so.

Correction of personal information

DBC Advisory endeavours to ensure that the personal information it holds is accurate and up-to-date. You are able to make a request to correct the information by contacting our Privacy Officer, or by telephoning or emailing us with your corrected information. In some limited circumstances your request may be refused or partially refused.

Procedure if your request to access or correct is refused

There may be limited circumstances where your request is refused or partially refused. If this occurs we will give you a written notice that sets out:

- The reasons for the refusal, including the reasons why access cannot be granted in an alternative way (except where it would be unreasonable to provide those reasons);
- How to make a complaint about the refusal;
- Any other matter as prescribed by the regulations.

If your request to correct is refused you have the option of submitting a statement associated with your personal information. For more information contact the Privacy Officer.

How to make a complaint

If you consider that any action of DBC Advisory breaches this policy or the Australian Privacy Principles, you can make a complaint. Once we have received your complaint, it will be assessed and acted upon within a reasonable time. To make a complaint please contact our Privacy Officer. If you are not satisfied with our response to your complaint, you may contact the Office of the Privacy Commissioner.

Use or Disclosure of Personal Information

DBC Advisory will not use or disclose personal information collected by us for any purpose other than the primary purpose for which it is collected, unless you would reasonably expect us to use or disclose the information for a secondary purpose or your consent has been obtained to use the information for additional purposes. Exceptions to this include where disclosure is:

- required by superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to the provision of services and recommendations made by us
- 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 audit, peer reviews, legal advice, consultancy, issuing statements or handling mail
- required by reporting entities for the purpose of complying with the Anti-Money Laundering and Counter-Terrorism Financing legislation
- permitted under the Australian Privacy Principles

Dealing with Unsolicited Personal Information

If DBC Advisory receives unsolicited personal information that we know could have been collected from you, we will afford it the same privacy protection as if we had solicited this personal information. If the information is not reasonably necessary for one or more of DBC Advisory's functions or activities or we know that we could not normally have collected the personal information, we will destroy or de-identify the information as soon as practicable, unless it is unlawful or unreasonable to do so.

Effect of Policy

DBC Advisory operates in a dynamic business environment and we aim to review this policy annually to keep it current. We may update this privacy policy at any time by publishing an updated version on this website. The amended policy will apply between us whether or not we have given you specific notice of any change.

How to Contact Us

All privacy complaints, requests for access to personal information, queries in relation to this Privacy Policy, or any other privacy related matter, should be directed to the Privacy Officer at DBC Advisory as follows:

Attn: The Privacy Officer
DBC Advisory Pty Ltd
Level 2, 8 Brodie Spark Drive
Wolli Creek NSW 2205
E: admin@dbcadvisory.com.au

We will respond to your request within a reasonable time and in accordance with the requirements of the Privacy Act.