



Privacy Policy

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Privacy Policy

True North Accounting & Advisory values and respects the privacy of the people we deal with. True North Accounting & Advisory is committed to protecting your privacy and complying with the Privacy Act 1988 (Cth) (**Privacy Act**) and other applicable privacy laws and regulations.

This Privacy Policy (**Policy**) describes how we collect, hold, use and disclose your personal information, and how we maintain the quality and security of your personal information.

What is personal information?

“Personal information” means any information or opinion, whether true or not, and whether recorded in a material form or not, about an identified individual or an individual who is reasonably identifiable. In general terms, this includes information or an opinion that personally identifies you either directly (e.g. your name) or indirectly.

What personal information do we collect and hold?

The personal information we collect about you depends on the nature of your dealings with us or what you choose to share with us.

The personal information we collect about you may include:

- Name, digital signature, address (residential and postal), phone number, email address and DOB
- Primary photographic ID such as a driver's licence or passport (*sensitive information*)
- Spouse and dependent details
- Tax File Number and Director Identification Numbers (*sensitive information*)
- Bank details, assets, income, investments
- Information regarding your employment such as salary and occupation
- Information regarding your superannuation and/or insurance arrangements

In certain circumstances, True North Accounting & Advisory may need to collect sensitive information about you. This may include information under '*what personal information do we collect*'.

If we collect your *sensitive information*, we will do so only with your consent, if it is necessary to prevent a serious and imminent threat to life or health, or as otherwise required or authorised by law, and we take appropriate measures to protect the security of this information (see page 4).

You do not have to provide us with your personal information. However, if you choose not to provide us with your personal information, we are not able to provide you with our services or otherwise interact with you as it is impracticable for us to deal with individuals who have not identified themselves. We will only ever collect information from you, the individual, unless it is unreasonable or impracticable to do so and we have authority under an Australian law, see page 4.

Why do we collect, hold and disclose your personal information?

We collect, hold and disclose your personal information as it is necessary to complete our functions or activities. This includes communicating with government organisations or other 'TFN recipients' on your behalf. We will not collect personal information (other than sensitive information) unless the information is reasonably necessary for one or more of our functions or activities. Under the below Australian laws, we are required to collect sensitive information such as tax file numbers and identification documents.

Under the Code of Professional Conduct and *Tax Agent Services Act 2009* tax agents are required to perform identity verification. Tax agents are required to sight primary photographic identification documents to confirm your identity.

Under the *Taxation Administration Act 1953 (TAA)* and *Privacy (Tax File Number) Rule 2015*, 'TFN recipients' such as tax agents and accountants are authorised to collect TFN's. Tax agents and accountants collect TFN's to identify you and communicate on your behalf with the Australian Taxation Office (ATO). It is not an offence to refuse to provide a TFN, however consequently we are unable to provide you with our services. In providing you with our services, we will only ever disclose your TFN to other 'TFN recipients' such as the following:

- The Australian Taxation Office (ATO)
- Government assistance agencies
- Employers, universities or investment bodies
- Solicitor, tax agents, accountants and share registries
- Superannuation funds

If an individual provides information to a 'TFN recipient' for a purpose not connected with the operation of a taxation, personal assistance or superannuation law and that information incidentally contains a TFN, the individual providing the information may remove the TFN.

If the individual does not remove the TFN, the TFN recipient must not use or disclose the TFN or record the TFN in a way that is inconsistent with the TAA or the TFN Rule.

Unauthorised use or disclosure of TFNs can be an offence under the TAA, as well as constituting a breach of the TFN Rule.

In completing our necessary functions or activities, the software's we use store information on overseas servers. These countries are New Zealand, Israel and the UK. We only disclose to overseas parties if the recipient is subject to laws similar to the Australian Privacy Principles and the law can be enforced. Both countries are subject to a law that is similar to the Australian Privacy Principles and these laws can be enforced in the relevant jurisdictions. To view the recipient's privacy policies, please see below:

- [Wix.com Privacy Policy](#)
- [Xero Privacy Policy](#)
- [FYI Docs Privacy Policy](#)

For further information, visit: [TFN Rule](#) or [Australian Privacy Principles](#)

How do we collect and hold your personal information?

We collect your personal information directly and indirectly by:

- Communicating with TFN recipients (listed on page 4) as tax agents and accountants
- Interactions with you over the phone
- Interactions with you in person
- Interactions with you online (such as website or social media)
- You participating in forms, surveys or questionnaires, or subscribe to our mailing list
- You are attending a True North Accounting & Advisory event (either in person or online)
- You applying for a position with us as an employee, or contractor

Collecting personal information from third parties

We may also collect your personal information from third parties or through publicly available sources, for example from:

- Australian Taxation Office (ATO)
- Australian Business Register (ABR)
- Australian Securities and Investment Commission (ASIC)
- Banks, Credit Unions & Superannuation Funds
- Employers & Payroll Providers
- Software & Payment Platforms

We collect your personal information from these third parties so that we can undertake and complete the agreed upon engagements you require our services for.

How do we use your personal or sensitive information?

We use personal information for many purposes in connection with our necessary functions and activities, including the following purposes:

- Provide you with information or services that you request from us (refer to your engagement letter)
- Deliver to you a more personalised experience and service offering
- Improve the quality of the services we offer
- Internal administrative, marketing and research purposes
- To verify your identity under the Tax Agent Services Act 2009, or communicate with the ATO¹

Disclosure of personal information to third parties

We may use or disclose your personal information to third parties in accordance with this Policy in circumstances where you would reasonably expect us to use or disclose your information. We will not use or disclose your personal information that we collected for a primary purpose (our necessary functions or activities agreed to in our engagement letters) for any other secondary purpose unless you have consented to its use or disclosure. We will never use or disclose your government-related identifiers (such as a Tax File Number) to recipients other than 'TFN recipients' that we are authorised by law to disclose to (see page 4). For example, we may also disclose your personal information to:

- Our third-party service providers (for example, our accounting and document storage service providers)
- Our marketing providers or website
- Our professional governing bodies (Institute of Public Accountants) if a Quality Review Program is required

¹ We will only adopt and use your government related identifier as our own identifier of you under Privacy (Tax File Number) Rule 2015. We will use and disclose your government related identifier in line with this Australian law and the Australian Privacy Principles (3.4a, 9.1, 9.2 & 9.3) for the following reasons:

- The use or disclosure of the identifier is reasonably necessary for the organisation to verify the identity of the individual for the purposes of the organisation's activities or functions
- The use or disclosure of the identifier is reasonably necessary for the organisation to fulfil its obligations to an agency or a State or Territory authority (The Australian Taxation Office)

Transfer of personal information overseas

Some of the third-party service providers we disclose personal information to may be based in or have servers located outside of Australia, including in New Zealand, Israel and the UK.

Where we disclose your personal information to third parties overseas, we will take reasonable steps to ensure that data security and appropriate privacy practices are maintained.

We will only disclose to overseas third parties if:

- you have given us your consent to disclose personal information to that third party; or
- we reasonably believe that:
 - the overseas recipient is subject to a law or binding scheme that is, overall, substantially similar to the APPs; and
 - the law or binding scheme can be enforced; or
- the disclosure is required or authorised by an Australian law or court / tribunal order.

In completing our necessary functions or activities, the software's we use store information on overseas servers. These countries are New Zealand, Israel and the UK. We only disclose to overseas parties if the recipient is subject to laws similar to the Australian Privacy Principles and the law can be enforced. Both countries are subject to a law that is similar to the Australian Privacy Principles and these laws can be enforced in the relevant jurisdictions. To view the recipient's privacy policies, please see below:

- [Wix.com Privacy Policy](#)
- [Xero Privacy Policy](#)
- [FYI Docs Privacy Policy](#)

How do we protect your personal information?

True North Accounting & Advisory will take reasonable steps to ensure that the personal information that we hold about you is kept confidential and secure, including by:

- Having robust physical security of our premises and databases / records
- Taking measures to restrict access to only personnel who need that personal information to effectively provide services to you
- Having technological measures in place (for example, anti-virus software, fire walls)
- Providing accountants with training on physical and ICT security and the handling of

personal information, including TFN information

- Limiting access to TFN information to those staff who need to handle it to enable the agency or organisation to carry out its functions and activities
- Using audit logs and audit trails and monitoring access by both internal and external persons
- Enforcing password or passphrase complexity. For example, including uppercase characters, lowercase characters, punctuation, symbols, and/or numbers
- Ensuring the latest versions of software and applications are in use
- Employing and maintaining an intrusion prevention and detection system and regularly analysing event logs
- Developing procedures to manage the transmission of TFNs away from email such as a secure website, as email is not a secure form of communication

We refer closely to principle 11 of the Australian Privacy Principles and the OAIC's Guide to Securing Personal Information

Retention of personal information

We will not keep your personal information for longer than we need to. In most cases, this means that we will only retain your personal information for the duration of your relationship with us unless we are required to retain your personal information to comply with applicable laws, for example record-keeping obligations imposed by the Australian Taxation Office.

How to access and correct your personal information

True North Accounting & Advisory will endeavour to keep your personal information accurate, complete and up to date. We will do this by confirming your personal information with you on an annual basis.

If you wish to make a request to access and / or correct the personal information we hold about you, you should make a request by contacting us and we will usually respond within 5 days.

Online activity

Cookies

The True North Accounting & Advisory website uses cookies. A cookie is a small file of letters and numbers the website puts on your device if you allow it. These cookies recognise when your device has visited our website before, so we can distinguish you from other users of the website. This improves your experience and the True North Accounting & Advisory website.

We do not use cookies to identify you, just to improve your experience on our website. If you do not wish to use the cookies, you can amend the settings on your internet browser so it will not automatically download cookies. However, if you remove or block cookies on your computer, please be aware that your browsing experience and our website's functionality may be affected.

Website analytics

Our website uses Wix website analytics to help us better understand visitor traffic, so we can improve our services. Although this data is mostly anonymous, it is possible that under certain circumstances, we may connect it to you.

Direct marketing

We may send you direct marketing communications and information about our services, opportunities, or events that we consider may be of interest to you if you have requested or consented to receive such communications. These communications may be sent in various forms, including mail, SMS, fax and email, in accordance with applicable marketing laws, such as the *Australian Spam Act 2003* (Cth). You consent to us sending you those direct marketing communications by any of those methods. If you indicate a preference for a method of communication, we will endeavour to use that method whenever practical to do so.

You may opt-out of receiving marketing communications from us at any time by following the instructions to "unsubscribe" set out in the relevant communication.

In addition, we may also use your personal information or disclose your personal information to third parties for the purposes of advertising, including online behavioural advertising, website personalisation, and to provide targeted or retargeted advertising content to you (including through third party websites).

Links to third party sites

True North Accounting & Advisory website may contain links to websites operated by third parties. If you access a third-party website through our website, personal information may be collected by that third party website. We make no representations or warranties in relation to the privacy practices of any third-party provider or website and we are not responsible for the privacy policies or the content of any third-party provider or website. Third party providers / websites are responsible for informing you about their own privacy practices and we encourage you to read their privacy policies.

Inquiries and complaints

For complaints about how True North Accounting & Advisory handles, processes or manages your personal information, please contact us with the details below. Note we may require proof of your identity and full details of your request before we can process your complaint.

Please allow up to 5 days for True North Accounting & Advisory to respond to your complaint. It will not always be possible to resolve a complaint to everyone's satisfaction. If you are not satisfied with True North Accounting & Advisory's response to a complaint, you have the right to contact the Office of Australian Information Commissioner (at www.oaic.gov.au/) to lodge a complaint.

How to contact us

If you have a question or concern in relation to our handling of your personal information or this Policy, you can contact us for assistance as follows:

Email

info@followtruenorth.com.au

Yours faithfully,

True North Accounting & Advisory



Joshua Chisholm

Founder & Principal Accountant