

Privacy Policy

Effective 1 July 2017

1 Background

This policy sets out how mi-fi Group Pty Ltd ABN 70 1411 417 37 (mi-fi) collects, stores and uses the personal information of clients, staff and associated third parties of mi-fi and other persons ("information"), and explains:

- What kind of information is collected
- How it is collected
- How it is managed, used and stored
- How mi-fi uses personal information
- Security measures and disclosure overseas
- How to make a complaint
- How you can access and update information relating to you

mi-fi is committed to protecting the privacy of the personal information it collects and receives. We are bound by the Australian Privacy Principles (APP) contained in the Privacy Act 1988 (Cth).

2 Scope

This policy applies to information collected from persons whom mi-fi deals with in the ordinary course of its business. Mainly, this information is received from clients, staff and associated third parties of mi-fi.

mi-fi only collects personal information (being information that identifies or could reasonably identify an individual) where mi-fi considers it to be reasonably necessary for mi-fi functions and activities.

By engaging the services of mi-fi, you accept this Privacy Policy and expressly consent to mi-fi's collection, use and disclosure of your personal information as described in this Privacy Policy.

3 Privacy Act and Privacy Principles

mi-fi is committed to respecting the privacy rights of individuals in accordance with all applicable laws and standards. This policy is intended to comply with the *Privacy Act 1988 (Cth)* and the Australian Privacy Principles.

4 The Collection of Personal Information

What kind of Information is Collected?

mi-fi initially collects and holds information relevant to its provision of advice and the performance of accounting services. mi-fi collects personal information to service the needs of its clients and to carry out its professional duties when you make contact, enlist or otherwise engage our services as a client.

The types of information mi-fi collects includes:

- name, age, gender and address details;
- educational qualifications and financial accounts;
- work history, tax file numbers, tax returns, current employment and position;
- contact and banking details;
- assets and investments; and
- responses to forms and surveys (if any).

We may collect Sensitive Information where it is necessary for the performance of our services. Sensitive information is information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record.

How is it Collected?

The information collection process usually begins when the client enlists mi-fi's accounting services. mi-fi may also request clients, staff and associated third parties of mi-fi and other persons to provide additional information, from time to time.

mi-fi may collect your personal information from third parties including:

- your legal representatives;
- the Australian Tax Office (ATO);
- the Australian Securities and Investment Commission (ASIC);
- professional indemnity insurance providers; and
- public sources (phone directories, membership lists, professional and trade associations, ASIC, bankruptcy or court registry searches).

mi-fi may receive unsolicited information where personal information is provided to mi-fi that it has taken no active steps to collect (such as a job application sent to mi-fi by an individual on their own initiative, rather than in response to an advertisement).

mi-fi may keep records of unsolicited personal information if the information is reasonably necessary for one or more of mi-fi functions or activities. If not, it is mi-fi policy to destroy the unsolicited information or ensure that the information is de-identified, provided it is lawful and reasonable to do so.

How is it Stored and Managed?

Some information is transferred to and stored electronically in a databases managed by mi-fi. The electronic database will be cleared regularly of unused or outdated information except where archiving is required. Information will be kept only as long as it is necessary for its proper use by mi-fi, or as is permitted by law.

mi-fi will not use nor otherwise disclose the information held for any purpose peripheral to the provision of accounting and advisory services except where:

- you would have consented to the use or disclosure of your personal information;
- you would reasonably expect mi-fi to use or disclose your information for a secondary purpose;
- use or disclosure is required or authorised under Australian law or by a court or tribunal; or
- mi-fi reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement or auditing related activities conducted by, or on behalf of, an enforcement or professional standards body.

If mi-fi uses or discloses your personal information because mi-fi reasonably believes that the use or disclosure of your information is reasonably necessary for one or more enforcement or professional standard related activities conducted by, or on behalf of, an enforcement or professional standard body, mi-fi will give written notice of the use or disclosure.

What if I do not want to provide my personal details?

You can refuse to provide personal information and you may choose to be dealt with anonymously with the use of a pseudonym. However, a refusal to provide personal information or to be dealt with may mean that the service you requested will not be able to be provided or will be refused.

5 How mi-fi uses Personal Information

mi-fi uses the information contained in its files, records and computer database primarily for the following purposes:

- Managing and administering professional services;
- Communicating with ASIC and the ATO;
- Enlisting third party services (i.e. lawyers);
- Utilising various information technology service providers; and
- Receiving payments from clients and remunerating staff.

In addition, mi-fi may carry out client services and use data for related purposes such as updating and enhancing our client records, analysis for management purposes and statutory returns, legal and regulatory compliance and crime prevention we may obtain, process, use and disclose personal data about you.

6 Security and Quality of Personal Information

Restrictions on Access

No persons other than mi-fi and its employees, agents and contractors are authorised to access any information held by mi-fi. All persons who are allowed by Mi-fi to have access to the information are required to maintain its confidentiality and to comply with relevant privacy laws and this policy.

Information Accuracy

mi-fi is committed to taking all reasonable steps to ensure that our information is accurate and secure. mi-fi will not disclose personal information to another organization or individual without your consent except where required by law or regulation, or where mi-fi reasonably believes that it is reasonable in the course of business or otherwise necessary on health or public safety grounds or for reasons of duty of care.

Security Precautions

mi-fi will take reasonable steps to protect stored information from misuse, interference, loss, unauthorised access, modification or disclosure including:

- secure password protected databases for storage;
- confidentiality requirements of staff;
- security measures for access to mi-fi's systems including firewalls;
- servers kept at a secure location with limited access;
- document storage security requirements;
- access granted only those verified to receive personal information;
- access controls for mi-fi's building;
- limited provision of personal information to third parties subject to guarantees about use; and
- mi-fi's staff are trained to deal with the information.

mi-fi cannot guarantee that personal information will be protected against unauthorised access or misuse and mi-fi does not accept any liability for the improper actions of unauthorised third parties.

mi-fi will retain your personal information for as long as necessary to fulfil mi-fi's obligations to you, to protect mi-fi's legal interests, to comply with an Australian law or as otherwise stated to you when mi-fi collected your personal information.

7 Overseas Disclosure

mi-fi may disclose your personal information to other third party service providers operating outside Australia who work with mi-fi or one of mi-fi's agents or partners.

mi-fi may also store your personal information on servers based overseas or in the “cloud” or other types of networked or electronic storage.

Before disclosing your personal information to an overseas third party, mi-fi will first take reasonable steps to ensure that the overseas recipient:

- does not breach the APPs in relation to your personal information; or
- the recipient of the information is subject to a law, or binding scheme, that has the effect of protecting your personal information in a way that is substantially similar to the way in which the APPs protect the information.

To make it easy for you to deal with mi-fi and provide you with a more personal and consistent experience, mi-fi may exchange and combine personal information with related entities for the purposes described in this Privacy Policy.

If your personal information is collected using a document that references this Privacy Policy, you are taken to consent to the disclosure, transfer, storing or processing of your personal information outside of Australia.

You acknowledge and understand that by providing such consent:

- mi-fi will not be required to take steps as are reasonable in the circumstances to ensure that such third parties comply with the APPs;
- if the overseas recipient handles your personal information in breach of the APPs:
- mi-fi will not be liable under the Act; and
- you will not be able to seek redress under Act.
- the overseas recipient may not be subject to any privacy law or principles similar to the APPs;
- you may be unable to seek redress overseas;
- the overseas recipient is subject to a foreign law that could compel the disclosure of personal information to a third party, such as an overseas authority.

8 Accessing your personal information

You have the right, upon request, to access any of mi-fi’s records containing your personal information. To request access to your information please contact mi-fi’s privacy officer. mi-fi will respond to your request to access your information within a reasonable period of time.

Campbell King
cking@mifi.com.au
1300 200 101

On the basis that it is reasonable and practicable to do so, mi-fi will give you access to the information requested within thirty days of request. If mi-fi refuses your request to access personal information relying on its rights under the APPs, mi-fi will provide a written notice setting out the reasons for the refusal and how you can complain about the refusal.

When you make a request to access personal information, mi-fi will require you to provide some form of identification (such as a driver's licence or passport) so mi-fi can verify that you are the person to whom the information relates.

9 Keeping Your Personal Information Accurate

mi-fi will take reasonable steps to ensure mi-fi’s records of personal information are accurate, up to date and complete. The accuracy of information depends to a large extent on the information you provide. If you do not give mi-fi all the information mi-fi may require, or the information provided is inaccurate or incomplete, then the products, services and information mi-fi provide may be affected.

If you think there is something wrong with the information mi-fi holds about you please contact mi-fi's privacy officer to inform mi-fi of any errors and keep mi-fi up to date with any changes.

mi-fi will respond to your request to correct your information free of charge and in a reasonable period of time. If mi-fi refuses, mi-fi will give you a written notice setting out the reasons for the refusal; and the mechanisms available to complain about the refusal.

10 Resolving your privacy issues

If you have any issues you wish to discuss with mi-fi or if you're concerned about how mi-fi has collected or managed your personal information, please contact the privacy officer on:

Campbell King
cking@mifi.com.au
1300 200 101

For further information about privacy or if your concerns are not satisfactorily resolved, you may contact the Office of the Australian Information Commissioner on 1300 363 992 or read the Privacy Act's National Privacy Principles on their website.

11 Changes to this privacy policy

mi-fi may, from time to time, review and update this privacy policy to take account of new laws and changes to mi-fi's operations. Changes to this Privacy Policy will not affect mi-fi's use of previously provided information.