



PRIVACY POLICY AND STATEMENT

POLICY OWNER National Human Resources
LAST UPDATED October 2018

1. PURPOSE

The RSM Australia Group (the 'Firm') includes RSM Australia Pty Ltd practicing as RSM, RSM Financial Services Australia Pty Ltd and RSM Australia Partners and is a member of the global RSM Network. Each member of the RSM network is an independent accounting and consulting firm each of which practices in its own right.

The Firm endeavours to take all reasonable steps in order to comply with the *Privacy Act 1988* (Cth) (the '**Act**'), the Australian Privacy Principles (**APPs**) and any applicable State or Territory privacy laws, and to otherwise protect the privacy of the personal information that the Firm collects and holds.

This Privacy Policy explains how we collect, hold, use and disclose personal information in the course of providing our professional services, through interactions on our website and through our employment and marketing activities.

We have also taken steps to ensure that, if you tell us you are located in the European Union, and advise us that you wish to exercise the additional rights available to you under the General Data Protection Regulation, we will endeavour to meet those requests subject to the terms of this policy.

This is the policy of RSM Australia and its associated Australian entities.



2. PERSONAL INFORMATION COLLECTED BY THE FIRM

The Firm collects and holds personal information pertaining to its clients, prospective clients, prospective employees, employees, referral sources, alumni, contractors, subcontractors and other individuals with whom the Firm has dealings.

If it is reasonably necessary in the circumstances, the Firm may also collect sensitive information (which is a type of personal information) such as a person's medical history or medical health checks, membership of a professional organisation or criminal record.

The Firm collects and records personal information that is necessary to: the recruitment and selection process; the provision of services by the Firm or a contractor or subcontractor; and for marketing activities. Personal information is collected when a person:

- sends the Firm an email or written correspondence;
- provides feedback;
- applies for a position with the Firm;
- provides a resume, reference details, education records and personal information including citizenship status;
- participates in an interview;
- completes an assessment or exercise;
- provides information for the purposes of financial services and advice;
- attends events, and information sessions conducted by the Firm;
- offers services as a contractor with the Firm; and/or
- provides information in relation to services being provided to the Firm.

The Firm may also collect an individual's personal information from National Human Resources for the purposes of recruiting prospective employees or enrolling its employees in our induction courses.

Personal information may also be collected where the Firm is required to do so by law (for example, via education, child protection, work health and safety laws, charitable collections, medical treatment or other legislation in Australia).

Personal information that the Firm collects may include:

- name, date of birth, home and business address and Tax File Number declaration;
- records relating to your professional development, learning and development and work-related performance, if applicable;
- drivers licence or passport details;
- visa and work permit status;
- emergency contact details;
- pecuniary interests;
- imagery, including still or video;
- business contact details including job title and email address;
- financial data as provided by an individual to allow preparation of financial statements and statutory returns on their behalf; and/or
- all other personal information required for the management of the relationship an individual has with the Firm.

When applicable the Firm may ask an individual for additional information that is not stated above in order to assist us in carrying out our services or to comply with legislative requirements. As an example, the Firm may on occasion require bank account details, details of directorships and investments.

2.1 Why Does the Firm Collect Client Information?

The Firm collects, holds, uses and discloses personal information for the purposes of providing our services, conducting our business and communications.

The main purposes for which the Firm collects client's personal information are:

- to maintain client and alumni contact;
- to provide professional financial and advisory accounting services;
- to notify clients and alumni of events and services;
- to keep clients and alumni informed on any developments; and/or
- for administration requirements.

Some examples of the specific purposes for which the Firm may collect, hold, use and disclose personal information include the following:

- responding to a business query regarding our products or services;
- managing, operating and improving our website; and/or
- dealing with enquiries regarding prospective employment with us.

3. USE AND DISCLOSURE OF PERSONAL INFORMATION

The Firm uses and discloses personal information in accordance with this policy. Where requested by a person whose personal information is held by the Firm, the Firm will provide details of this activity.

3.1 Use and Disclosure – General

As part of our business processes, to back up our information or to obtain certain services, the Firm may use the services of a third party. As a result, personal information collected about an individual may be disclosed to third parties in these circumstances.

3.2 Use and Disclosure – Recruitment

Unsuccessful applications will be retained for any future opportunities. Personal information may also be retained after that time in reports created during the selection and through the application process.

Applicants may be required to provide their written consent to check records maintained by state and/or federal police, the Department of Immigration and Citizenship and the relevant state Road Authority as a part of the selection process. At the Firm's request, applicants may be required to undertake a medical or health check.

Where third parties are involved in the recruitment, selection or promotion of the Firm's personnel, applicants' personal information may be collected and/or held by that third party for that purpose. The applicant or the Firm may provide personal information to the third party for this purpose. Where such personal information is collected or held by the third party, it will be managed, de-identified and/or destroyed in accordance with the third parties' privacy policy.

3.3 Use and Disclosure - Marketing

The Firm may use and disclose an individual's personal information in order to inform them of products and services that may be of interest. In the event a person does not wish to receive such communications, they can opt-out by contacting the Firm marketing team or through any opt-out mechanism contained in a marketing communication to you.

4. PRIVACY ON OUR WEBSITE

Individuals do not have to reveal their identity or otherwise provide us with any personal information if they visit our website. However, if a person remains anonymous or goes by a pseudonym, the Firm may be unable to efficiently respond to a request.

Cookies may be used in some areas of the website to improve the navigation use by visitors.

If a person contacting us via our website is concerned about Cookies, most browsers recognise when a cookie is offered and allow the user to opt out. If a person does this they can still navigate on our website.

The Firm's website contains links to third party websites which a user can access if they wish. By clicking and accessing these links the user will be subject to the third party's privacy policy and not that of the Firm. The Firm is not responsible for the privacy policies or practices of those website and for any consequences of a person's use of those websites.

The Site is an Australian based website, and it is not intended to provide services to EU residents, and its terms may not be fully consistent with the General Data Protection Regulation. If you are an EU resident and you choose to use the Website then you do so at your own risk, and on the terms of the Site.

5. STORAGE AND DATA SECURITY

All reasonable steps are taken to protect the security of personal information held by the Firm. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy. The Firm may engage a third party for the storage of personal information, including cloud storage and will take reasonable steps to ensure that the personal information is protected by the third party, including by requiring the third party to itself comply with the Act and the APPs and any applicable State or Territory privacy laws in relation to personal information passed to it by the Firm. The Firm will permanently destroy or de-identify personal information the Firm holds about an individual if the Firm no longer needs it for any purpose, including the purposes set out in this Privacy Policy. Appropriate de-sensitisation of data is practiced and information is destroyed using secure means.

6. ACCESS ARRANGEMENTS

Individuals are able to access personal information held about them by the Firm in a prompt and confidential manner by making a request to the Firm. The Firm treats all requests for access seriously and any request to access personal information will not negatively impact the individual's existing obligations or affect any arrangement between them and the Firm.

Clients of the Firm are able to gain access to the information the Firm holds about them by contacting the Manager/Principal/Partner responsible for providing their services.

All requests will be dealt with in a timely manner and the Firm will endeavour to respond within 30 days. Individuals who find that the personal information the Firm holds about them is inaccurate, incomplete or out-of-date are asked to contact the Firm immediately via the contact details below and the Firm will correct it.

An individual's right to access their personal information is not absolute. The Firm may deny access to personal information if:

- the request does not relate to the personal information of the person making the request;
- the request is frivolous or vexatious;
- providing access would pose a serious and imminent threat to life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access discloses a 'commercially sensitive' decision making process or information; and/or
- any other reason that is provided for in the APPs set out under the Act.

If the Firm denies access personal information, the Firm will provide the person seeking access with written reasons. Where possible, the Firm will respond to each request within 30 days of a request being received; or where the request is not complicated or does not require access to a large volume, information will be provided as soon as reasonably practical.

There is no charge for making a request for access to personal information. However, individuals will be required to pay all reasonable costs imposed by the Firm for the provision of the requested personal information. Fees will be charged for accessing, photocopying and any delivery charges for personal information stored off-site and access to electronic databases.

7. DATA INTEGRITY

The Firm endeavours to maintain accurate and up to date information. From time to time, the Firm may request individuals to provide an update of their personal information, and at times this is to aid in meeting the Firm's obligations under the APPs.

8. NOTIFIABLE DATA BREACHES SCHEME

RSM has in place policies and procedures to investigate suspected breaches, mitigate any harm and report in accordance with requirements.

9. DISCLOSURE OF PERSONAL INFORMATION OUTSIDE OF AUSTRALIA

There are several circumstances in which the Firm may disclose personal information outside of Australia.

First, in some circumstances, as part of the delivery of the Firm's services, the Firm may be required to disclose personal information to other members of the RSM network or their representatives overseas. The full list of countries where RSM members firm are located is available [here](#).

Second, the Firm may disclose personal information to third party service providers of the Firm which are located overseas.

The Firm will take reasonable steps to ensure that the overseas recipient does not breach the APPs in relation to the personal information disclosed to it. Any such transfer of personal information does not change any of the Firm's commitments to safeguard the privacy of personal information and to comply with the Firm's obligations under the Act.

10. COMPLAINTS

Any issues or complaints in relation to the collection, use, disclosure, quality, security of and access to your personal information may be made to National Human Resources at this address.

Director of National Human Resources
RSM
Level 21, 55 Collins Street Melbourne VIC 3000
PO Box 248, Collins Street West VIC 8007

The Firm will respond to each complaint within a reasonable period, and try to resolve the complaint.

If a person is dissatisfied with the Firm's response to their complaint, they can contact the Office of the Australian Information Commissioner. See www.oaic.gov.au for how to make a complaint.

11. INFORMATION

For any further information about this Privacy Policy, individuals are asked to contact the Director of National Human Resources.

The Firm may amend this Privacy Policy from time to time by publishing an updated version on this website.