

Privacy Policy

1. Introduction

The privacy of personal information is important to Oxygen Private Clients Pty Ltd (ABN 82 128 479 158) (**OPC, we, our or us**). OPC is committed to protecting the privacy of an individual's personal information. This policy sets out how OPC will protect the privacy of your personal information, your rights in relation to your personal information managed by us and the way OPC collects, holds, uses and discloses your personal information. OPC may change this policy from time to time which will be made available on our website.

In handling your personal information, we comply with the Privacy Act 1988 (Cth) (**Privacy Act**), including the Australian Privacy Principles.

If you access our website or receive our services, you acknowledge that you have read, understood and agree to your personal information being handled in accordance with policy. Whilst you are under no obligation to provide us with your personal information, we may be unable to provide you with our services if you do not provide all requested information.

2. What kinds of personal information does OPC collect?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

OPC may collect the following kinds of personal information about you to provide you with our services:

- your full name and date of birth,
- contact information such as your business and personal addresses, telephone numbers, mobile numbers, email addresses or other contact details;
- identity documents such as your driver licence and passport, including driver licence number and passport number;
- marital and relationship status, including details of your dependents and prior relationships;
- VISA, citizenship, residency and permit information;
- company, partnership and business details such as your ABN, ACN, business names and officeholder information;
- trust arrangements, including details of trustees, unitholders and beneficiaries, trust property and units;
- financial information about your assets and liabilities (including superannuation and other investments), account balances, bank account details; account activities, trust arrangements, credit history, financial statements, payment history and transactions with us and third parties;
- employment and occupation information, including details of your job title, current employer, employer history and income;
- tax information including your tax file number, tax returns and related information;
- health insurance information;
- professional and business information about your membership of professional associations; and
- estate planning information and other legal documents to which you are a party, including Wills, Health Directives, Powers of Attorneys and Statement of Wishes.

In some circumstances, we may also hold other personal information provided by you.

When you use our website, we collect information which may include your server/IP address, the date and time of your visit, the pages accessed, the information you download and the type of browser used. We collect this information to help us determine how and why people visit our website, for the purposes of marketing and advertising and to improve the services we offer.

We do not generally collect sensitive information about you without your consent or where we are required by law. Sensitive information may include information regarding your health, racial or ethnic origins, political or religious beliefs, sexual preferences, membership of professional or trade associations or unions, or criminal convictions.

We may collect information about your health and medical status for the purpose of providing estate and succession planning services to you.

3. How does OPC collect personal information?

Generally, OPC collects your personal information in a number of different ways, including:

- when you provide information to us directly such as:
 - when you complete our forms, surveys, applications or other documents, whether online or in hard copy;
 - when you communicate or correspond with us, whether in person, in writing by email or post, over the phone or by audio-visual means, such as via meetings and exchanges, telephone calls, email or other electronic correspondence;
 - when you provide us with original, or copies of, documentation whether delivered in person, by post or electronically;
 - by receipt of mail which you have directed to be sent to OPC;
- when you use our website;
- where third parties provide that information to OPC, but only if you have consented to us collecting the information in this manner or you would reasonably expect us to collect information about you from a third party;
- where our related entities and related bodies corporate have disclosed that information to us in accordance with its privacy policy; and
- where that information can be obtained from publicly available sources.

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Cookies may be used on our website to collect information about you. A cookie is a small piece of information which is stored by your browser on your computer's hard drive. Cookies allow web applications to respond to you as an individual. The web application can tailor its operations to your needs, likes and dislikes by gathering and remembering information about your preferences.

We use cookies so that we can remember you when you return to the website, to help customise your web experience with us, to allow our website to function properly and to monitor aggregate site usage data such as total number of visitors and pages viewed. This helps us analyse data about web page traffic and improve our website in order to tailor it to customer needs. We may associate personal information with a cookie file in those instances and only use this information for statistical analysis purposes and then the data is removed from the system.

Overall, cookies help us provide you with a better website, by enabling us to monitor which pages you find useful and which you do not. A cookie in no way gives us access to your computer or any information about you, other than the data you choose to share with us. You can choose to accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. This may prevent you from taking full advantage of the website.

We may receive unsolicited personal information about you. We destroy or de-identify all unsolicited personal information we receive, unless it is relevant to our purposes for collecting personal information. We may retain additional information we receive about you if it is combined with other information we are required or entitled to collect. If we do this, we will retain the information in the same way we hold your other personal information.

4. Why do we collect your personal information?

OPC collects, holds, uses and discloses your personal information where it is reasonably necessary for the purposes of:

- providing services to you, including providing:
 - tax, accounting and superannuation services, including tax audit insurance;
 - estate and succession planning services;
 - services in accordance with any agreement you enter into with OPC;
- accounting, billing and other record keeping or administrative purposes;
- identifying and informing you of services that may be of interest to you from OPC or other selected third parties, our related entities and our related bodies corporate;
- responding to your enquiries;
- improving our services;
- undertaking marketing and promotion of us and our services, including by sending promotional emails, special offers or other information which we think you may find interesting using the email addresses which you have provided;
- contacting you for feedback on our website and services for market research purposes. We may contact you by email, phone or mail. We may use the information to customise our website according to your interests;
- adding you to our mailing list (where you have subscribed);
- any other purpose which you have consented to; and
- complying with any applicable laws, rules, regulations, codes and requirements of any relevant body or authority, including OPC's obligations under:
 - applicable laws, such as taxation law;
 - the Corporations Act 2001 (Cth);
 - the Australian Securities and Investments Commission Act 2001 (Cth); and
 - the Bankruptcy Act 1966 (Cth).

Tax file numbers are only collected for tax-related purposes.

Where personal information is used, or disclosed, OPC takes reasonable steps to ensure it is relevant to the purpose for which it is to be used or disclosed.

5. Disclosure of your personal information

Generally, OPC will only disclose your personal information for the purposes of providing its products and services to you.

We may disclose your personal information to third parties. These third parties may include:

- government departments or other regulatory authorities and professional associations;
- our business associates, related entities and related bodies corporate;
- our agents, affiliates or service providers who act for or on our behalf in connection with any of our products or services;
- service and/or product providers or distributors;
- our lawyers and other professional advisors;
- your authorised investment and professional advisors;
- lenders and credit providers;
- insurers and audit insurance providers;
- certain software and IT providers;
- marketing agencies;
- third parties engaged to perform administrative tasks;
- payment processing providers; and

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- to others with your consent or that you have been informed of at the time any personal information is collected from you.

This disclosure is always on a confidential basis. OPC may also disclose your personal information to other third parties if:

- you have provided your consent;
- you would reasonably expect us to disclose information of that kind to a third party; or
- we are required or authorised by law to do so, or if it is necessary to assist with law enforcement.

6. Disclosure to overseas recipients

We, or third party service providers we engage, may also use cloud-based storage and IT servers which may be located outside Australia to store your personal information. In those instances, it may be necessary for us to disclose personal information to overseas recipients for the storage of that information on those cloud-based data storing facilities and you consent to the transfer, storage and processing of that information outside of Australia.

7. Direct marketing

OPC may use and disclose your personal information in order to inform you of products and services that may be of interest to you. In the event you do not wish to receive such communications, you can opt-out by contacting our Privacy Officer on the contact details set out below or through any opt-out mechanism contained in a marketing communication to you.

8. Security of your personal information

We recognise the importance of securing the personal information of our clients. We will take steps to ensure your personal information is protected from misuse, interference or loss, and unauthorised access, modification or disclosure.

Your personal information is generally stored in our computer database. Any paper files are stored in secure areas. The protection measures in place include:

- confidentiality requirements for employees, contractors, agents and personnel;
- company policies relating to data protection of privacy for personnel;
- confidentiality statements on all outgoing correspondence including email;
- document storage security policies;
- security measures including encryption, password protections, firewalls, site monitoring and intrusion detection;
- providing a discreet environment for confidential discussions; and
- only allowing access to personal information where the individual seeking access has satisfied OPC's identification requirements.

However, OPC cannot guarantee the security of personal information provided to us electronically via the internet, email or text, nor can it guarantee the safe delivery of personal information via ordinary post and as such any communication is made at your own risk. The security arrangements are reviewed and tested from time to time.

Our website may contain links to other websites of interest. However, once you have used these links to leave our website, we do not have any control over that other the third party website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this policy. You should exercise caution and look at the privacy policy applicable to the website in question.

9. Accessing and correction of your personal information

We are committed to ensuring that the personal information OPC collects, holds and uses is accurate, current, complete, relevant and not misleading. Under the Privacy Act, you have a right to access and seek correction of your personal information that we collect and hold.

If at any time you would like to access the personal information OPC holds about you, please contact our Privacy Officer on the contact details set out below and we will grant access within 30 days of your request. However, we may deny access to your personal information to the extent permitted under the Privacy Act, which includes in circumstances where we consider providing access would pose a serious threat to the life, health or safety of an individual or there would be an unreasonable impact on the privacy of others. In circumstances where access is refused, we will provide you with written reasons for the refusal and details of complaint mechanisms.

If at any time you believe that our record of your personal information is not correct or out-of-date, please contact our Privacy Officer to arrange for correction of that personal information. In those circumstances or where we are satisfied that the personal information held is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that personal information so that it is accurate, up-to-date, complete, relevant and not misleading within 30 days of your request.

Before we provide access or make any corrections regarding your personal information, we will require proof and verification of your identity. An administrative fee for search and photocopying costs may be charged for providing access.

10. Notification of data breaches

Where your personal information held by us has been lost, accessed or disclosed without our authorisation, we will comply with our response plan and relevant notification requirements in accordance with the Privacy Act.

11. How to contact us for further information, enquiries, or requests

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For further information, enquiries or requests regarding your personal information, or if you would like to opt-out of receiving any promotional and marketing communications, please contact our OPC Privacy Officer:

The Privacy Officer
Oxygen Private Clients Pty Ltd
Level 1
25 Burwood Road
HAWTHORN VIC 3122
Telephone: +61 414 491 468

You can obtain further information about privacy in Australia and the protection of personal information by visiting the Office of the Australian Information Commissioner's website at <https://www.oaic.gov.au/>.

12. Complaint handling processes

You can make a complaint to us about the treatment or handling of your personal information by lodging a complaint with the Privacy Officer.

We will endeavour to address your complaint efficiently and within a reasonable timeframe. However, if you are not satisfied with our response you may contact the Office of the Australian Information Commissioner via its website at <https://www.oaic.gov.au/> or 1300 363 992.