

This is the privacy policy of Enspira Financial Pty Ltd and Enspira Holdings Pty Ltd (together, **Enspira Financial**). Enspira Financial respects your privacy and it is important to us. We understand our legal and professional obligation about ensuring client information should be kept confidential at all times. We are committed to protecting the privacy of personal information obtained through our operations as a professional services firm.

Enspira Financial has created this privacy policy ("Privacy Policy") in order to demonstrate its firm commitment to privacy.

1. This Privacy Policy applies to personal information collected by Enspira Financial from you, your external bookkeeper, your advisors, other external accountants or related institutions such as banks.
2. Enspira Financial is bound by the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles ("APPs").
3. Enspira Financial will update this Privacy Policy as required. If it is changed, the changes will be posted on our website so that you are always aware of the sort of information collected, how the information may be used, and under what circumstances it may be disclosed by us.
4. Please note that if at any time Enspira Financial is required by law to release information about you or your organisation, we must cooperate fully.
5. This Privacy Policy does not apply to acts or practices of Enspira Financial that are directly related to employee records of current or former employees.

What Sort of Information does Enspira Financial Collect and Hold?

1. Enspira Financial collects personal and possibly sensitive information (the "information") that is necessary for, or directly related to, its functions or activities, eg taxation advice and services, business and consulting services, management accounting and bookkeeping services, corporate services, forwarding to various other outsourced providers for audit services, financial planning services and similar business activities.

Examples of information that we may collect and hold includes:

- Name, residential, business and mailing address, date and place of birth
- Contact details such as telephone numbers and email addresses
- Tax File Number
- Nature of Business
- Financial information such as bank account
- Family relationships and business relation connections
- Financial Records

2. In addition, our website uses cookies to identify site users and their interests and to track usage of the site. Cookies are small pieces of text stored on a computer that help us to know which browser the operator is using, where they have been on the site and any websites to which they may link in order to use some of our features. By acceptance of our cookie, the user will be permitted access to certain pages of the site without having to log in each time they visit. A user who does not accept the cookie from the site may not be able to access certain areas of the site.

We log IP addresses, or the location of computers on the internet to help diagnose problems with our server and to administer the site. If the user prefers not to accept a cookie, they can set their web browser to warn them before accepting any cookies. Alternatively they can refuse all cookies by turning them off in their web browser.

What Happens if You Do Not Provide the Information?

The nature of the services provided by Enspira Financial is that certain personal information is required in order to ensure we are able to provide the required scope of services for the individual and all their associated entities. Failure to provide the information may compromise the ability of Enspira Financial to achieve this goal.

Why and How Does Enspira Financial Collect the Information and How does Enspira Financial use the Information

1. Enspira Financial collects the Information to provide you with a specific service. For example, we may use the Information you provide us to prepare financial statements, provide management accounting services, prepare an income tax return, prepare a business activity statement, to collate information for a superannuation fund audit and other services.
2. Enspira Financial only collects personal information that has been directly provided to us by our clients or prospective clients, associates of clients, our suppliers or potential suppliers, our employees or potential employees, or is otherwise available in the public domain where this information will assist us with the provision of services to our current and prospective clients. Information may have been provided verbally or in writing (including by email or through web forms). Enspira Financial may from time to time collect personal information concerning an associate of a client or prospective client (eg spouse or child) where it is considered unreasonable or impracticable to seek this same information directly from the associate.
3. The information may be collected by Enspira Financial via written forms, email, verbally or our secure portal. We also use the personal information to send you material either via email or post that you request. If at any time you receive material that you did not request or do not want to receive, please notify us using the contact information below.
4. We may use personal information specifically your name and relevant address details, to let you know about our services, facilities and benefits and those of third party partners/contractors/suppliers of Enspira Financial, where we have your consent. We are not permitted to do so unless we have your consent. We and/or our partners/contractors/suppliers may contact you for direct marketing purposes in a variety of ways, including by mail, email, SMS, telephone, online advertising or facsimile.

For example, where we have your consent, we will send you:

- Periodical newsletters to keep you informed of matters relating to your business, taxation and/or financial information or in matters relating to your financial affairs. We also would keep you informed of any current and new service offerings.
- Notices where a service or product is currently being maintained.
- Newsletters informing you of a change in staff working hours, change in rates and general company developments.

You may at any time opt out of receiving such information by unsubscribing to the newsletters or via email to info@enspira.com.au

5. Whenever we collect or process your personal data, we'll only keep it for as long as is necessary for the purpose for which it was collected, subject to satisfying any legal, accounting or reporting requirements. Personal information provided in connection with the provision of our services will be retained in accordance with our retention policies unless we agree otherwise with you, in writing.
6. In some circumstances, you can ask us to delete your data.

To Whom does Enspira Financial Disclose Your Personal Information?

1. Enspira Financial will not supply to third parties any personal information obtained from you other than in relation to the provision of the services for which you engage Enspira Financial. Enspira Financial may engage third party contractors or service providers to carry out some or part of its activities on behalf of Enspira Financial, including contractors located outside of Australia, and you consent to us doing so.

Our current contracting partners are:

- Global Staff Connections – based in The Philippines
 - Super Records – based in India
 - IT&C Managed IT Services – based in Australia
 - Innovation Station – based in Australia
2. Enspira Financial ensures that all contractors used are contractually obligated to comply with the Privacy Act and the APPs, regarding handling of personal information and ensures that an ongoing training regime is put in place by such contractors to achieve this. Furthermore, all information made accessible to our contractors is stored on secure data servers located in Australia.
 3. Enspira Financial will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you unless it is for the purpose of providing our services to you or where we have your consent to do so.
 4. Enspira Financial may, from time to time, provide your personal information to Government agencies such as the Australian Taxation Office, Australian Securities & Investments Commission. However, unless directed or required by law, it will only do so in providing the services you engage us to provide to you.
 5. Should it be necessary to forward personal information to third parties outside the firm, we will make every effort to ensure that the confidentiality of the information is protected.

How Will Enspira Financial Keep Your Personal Information Secure?

1. Enspira Financial will take all reasonable steps to protect against the loss, misuse and/or alteration of the Information under its control. Including through appropriate physical and electronic security measures. Only authorised Enspira Financial personnel or specially contracted staff are provided access to personal information and these personnel are contractually obligated to keep the Information confidential. We may be required to keep records for a certain period of time and take steps to destroy the information when it is no longer required.
2. All data that is stored electronically is on secure data servers located within Australia and is only used for the purpose of providing our services to you. The steps we take to secure the personal information we hold include ICT security (such as encryption, firewalls, anti-virus software and login and password protection), secure office access, personnel security and training and workplace policies.

Accessing, Correcting and Updating Your Personal Information

You may gain access to Information that Enspira Financial has collected about you, by contacting our Privacy Office on the contact details below.

There is no charge for requesting access to your personal information, but we may require you to meet our reasonable costs in providing you with access (such as photocopying costs or costs for time spent on collating large amounts of material). Should your request for access to your personal information require a significant amount of time and effort on our part, we will discuss and agree with you the anticipated costs before proceeding.

We will respond to your requests to access or correct personal information in a reasonable time and will take all reasonable steps to ensure that the personal information we hold about you remains accurate, up to date.

Complaints

You may make a complaint about Enspira Financial's handling of your personal information, or in relation to your dealings with us about your personal information, by contacting the person named below. Our policy is to provide a written acknowledgement of our receipt of any request for access to personal information or a request for correction within seven (7) days. We will then provide a written response within 60 days of your request.

If you remain unsatisfied with the way in which we have handled a privacy issue, you may approach an independent advisor or contact the Office of the Australian Information Commissioner (www.oaic.gov.au) for guidance on alternative courses of action which may be available.

How to Contact Us

If you have any questions about this Privacy Policy, please contact:

The Privacy Officer
Enspira Financial Pty Ltd/Enspira Holdings Pty Ltd
PO Box 7219
Warringah Mall
NSW 2100

PH: 1300 908 558
Email: info@enspira.com.au

Date: 29 March 2021



Start



Scale



Secure