

MSA Privacy Policy

The policy statement refers to all independent entities within the Moore Stephens Australia network. Collectively referred to as “MSA”

Introduction

The Privacy Amendment (Enhancing Private Protection) Bill 2012 was passed with amendments on the 29 November 2012. The Privacy Act includes a set of new, harmonised, privacy principles that will regulate the handling of personal information.

These new principles are called the Australian Privacy Principles (APPs).

Your privacy is important to MSA and we are committed to handling your personal information in a responsible way in accordance with the Privacy Act 1988.

The Moore Stephens Australia (MSA) Privacy Policy sets out how we may collect, store, use and disclose your personal information.

What information will we collect?

MSA will collect the information necessary for us to provide you with the services you have engaged us to complete on your behalf and to allow us to manage our relationship with you.

The information MSA generally holds and collects will include an individual’s name, address, e-mail address, phone numbers, banking details, date of birth, investment details, payroll details, taxation details and other accounting and financial services related information.

We will only collect your sensitive information if you have provided us with consent to do so. Where practicable, we will give you the option of interacting with us anonymously.

The nature of the services provided by MSA may limit us from allowing the use of pseudonym, we will advise you accordingly where the use of pseudonym is permissible.

How do we collect this information?

MSA may collect your information from you in various ways, including face to face meetings, via the telephone, emails, hard copy forms and from our website.

Personal information will be collected directly from you unless you have authorised otherwise.

On all occasions, your information is collected, held, used and disclosed by us in accordance with this Privacy Policy.

How do we use this information?

MSA collects, hold, use and disclose personal information from you or about you where it is reasonably necessary for us to carry out our business functions and activities. MSA will only use your information for the purpose for which you provided it to us, related purposes and as permitted by law.

How will your information be disclosed?

Staff of MSA will have access to your personal records, for use in the provision of services to you.

MSA may also disclose information to third-party service providers, within or outside of Australia. Where such disclosure occurs MSA has established controls and procedures designed to ensure compliance with our privacy policies.

MSA may also need to disclose your personal information to one or more of the third party organisations which may include:

- a client's personal financial advisor and their service provider;
- individuals or organisations that are your representatives including a client's legal advisors;
- organisations authorised by Federal or State legislation;
- other organisations where a client has given their express consent;
- The Australian Tax Office;
- The Australian Securities and Investments Commission;
- Off-site third-party organisations providing secure storage and archiving services; and
- Other third parties as required by us in performing the functions and activities of the service.

Overseas disclosure

Our business is affiliated with other businesses located overseas. In the course of doing business with you, we may disclose some of your personal information to overseas recipients. However, we will only do so where:

- it is necessary to complete the transaction you have entered into; and
- you have provided consent; or
- we believe on reasonable grounds that the overseas recipient is required to deal with your personal information by enforceable laws which are similar to the requirements under the APPs; or
- it is otherwise permitted by law.

At present, some of our network entities may exchange data with our overseas affiliate located in India.

How is your information secured?

MSA utilises a range of procedures to protect your personal information. These may include:

- Security procedures associated with access to our business premises;
- Security procedures within our offices;
- IT systems designed to ensure personal information is only available to those staff who require access;
- IT security procedures including password protection, firewalls, intrusion detection and site monitoring;
- We will retain your personal information whilst it is required for any of our business functions, or for any other lawful purpose;
- We will also retain your personal information for the time periods required by law; and
- Mandatory confidentiality guidelines for all staff within the business.

Accuracy, Access & Correction

Clients of MSA may access personal information held by the firm, subject to a small number of legal restrictions. Where restrictions exist on our ability to provide you with access we will advise you of those reasons at the time of your request.

Should you wish to view the personal information held on them you should contact the member of staff responsible for their file or the Privacy Officer of MSA, and request a "personal Information Access Form".

While we do not charge a client for making a request to access their personal information, you should be aware that MSA may charge a fee for time and cost in the following circumstances:

- Staff costs: if an extended amount of time is required in searching for, locating, retrieving, collating and preparing the material; and
- Costs associated with using an intermediary.

Any charges for accessing the information will be advised prior to commencement (estimated time and cost).

In the event that you wish to advise us of changes to the personal details we hold, please contact your MSA Representative by phone, email, mail or fax, and we will amend your file accordingly.

In certain situations, we may not agree to a request to correct information we hold about you. If this occurs, we will advise you of this and our reason for not agreeing to the correction request and you have the right to complain about the refusal in the manner set out in the next section.

What do you need to do if you have a complaint?

If you want to make a complaint about our handling of personal information we ask that you contact MSA first. We will then follow our Internal Dispute Resolution process and we will endeavour to respond within a reasonable period after the request is made (not exceed 30 calendar days). If the matter proves to be more complex we will advise you of a revised response timeframe in writing.

Any complaint regarding a possible breach of privacy by MSA should be directed to Moore Stephens Australia in writing; mail or e-mail to the Privacy Officer at the following address:

The Privacy Officer
Moore Stephens Australia

If your complaint is not handled satisfactorily, you may refer your complaint to:

The Office of the Australian Information Commissioner
GPO Box 2999
Canberra ACT 2601
Australia
Phone: 1300 363 992
Fax: 02 9284 9666
Website: www.oaic.gov.au

Privacy Policy Updates

This Privacy Policy is not a static document. MSA may from time to time make changes and update this Privacy Policy. The current MSA Privacy Policy will always appear on our website.