



CHARTERED ACCOUNTANTS
FINANCIAL ADVISORS

Pinker Arnold McLoughlin is committed to treating the personal information we collect in accordance with the Australian Privacy Principles in the Privacy Act 1988 (Commonwealth) (Privacy Act) and the Privacy Amendment (Enhancing Privacy Protection) Act 2012.

Pinker Arnold McLoughlin 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.

Please note that if at any time Pinker Arnold McLoughlin is required by law to release information about you or your organisation Pinker Arnold McLoughlin must cooperate fully.

This Privacy Policy does not apply to acts or practices of Pinker Arnold McLoughlin that are directly related to employee records of current or former employees. In summary, 'personal information' is information or an opinion relating to an individual which can be used to identify that individual.

Personal information we collect

As a provider of accounting services we are subject to certain legislative and regulatory requirements which necessitate us obtaining and holding detailed information which personally identifies you and/or contains information or an opinion about you.

In general, the main types of personal information we collect and hold includes (but is not limited to):

- Names
- Contact details
- Genders
- Dates of Birth
- Employment details and employment history
- Tax File Numbers
- Details of your financial circumstances, including bank account details, your assets and liabilities (both actual and potential), income, expenditure and superannuation.

You have a right not to provide information that can identify you, but failure to provide this information may expose you to higher risks in respect of advice and recommendations made to you. It may also prevent us from providing our services or alternatively, affect the adequacy or appropriateness of advice we give to you.

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us.

To Whom Does Pinker Arnold McLoughlin disclose Your Personal Information?

Pinker Arnold McLoughlin will not sell, rent, trade or otherwise supply to third parties any personal information from you unless you consent.

Correcting and Updating Your Personal Information

You may access and update the personal information at any time by contacting us. If you believe that we may hold other personal information about you which is inaccurate, please contact us and we will take reasonable steps to ensure that it is corrected.

Sensitive information

Some of the personal information is “sensitive information” as defined by the Privacy Act. Sensitive information includes health information, information about your race, ethnic origin, political opinion, religion, trade union or other professional or trade association membership, sexual preference and criminal record. We will only collect this information as permitted under the Privacy Act.

Sensitive information will be used and disclosed only for the purpose for which it was provided or a directly related secondary purpose, unless you agree otherwise, or where certain other limited circumstances apply (e.g. where required by law).

Collection of personal information

We collect personal information in a number of different ways, for example:

- directly via face to face meetings or over the phone
- through correspondence with us or when you subscribe electronically to our publications
- you provide it to us via business cards
- a third party provides it to us, for example, a report provided by a medical professional, fund manager, superannuation and other product issuer; or
- reference from another person, your personal representative or a publicly available record

You have a right to refuse us authorisation to collect information from a third party.

Sometimes you may provide us with someone else’s personal information, e.g. other members of your family group. You must not do this unless you have their consent to do so. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

Unsolicited personal information

There may be times when we receive personal information that we do not solicit. If this occurs we will determine if you have given your consent and the information is necessary for us to provide our services, or whether the collection is required or authorised by or under an Australian law or a court/tribunal order. If it is, the information will be dealt with in accordance with the Australian Privacy Principles as if the information had been solicited.

If it is determined that we could not have obtained this information, we will destroy or de-identify the information as soon as practicable, provided it is lawful and reasonable to do so.

Website collection

We may collect personal information from the web site www.pam.com.au through receiving subscription applications and emails. We may also use third parties to analyse traffic at our web site, which may involve the use of cookies. Cookies are primarily used to enhance the website capability.

Much of the information we collect is statistical and not personally identifiable.

In general you are not required to provide personal information via our website, however you may choose to do so in order to receive information on our services, apply for an employment position or receive our newsletter.

Our website may also show links to third party websites who are not subject to our privacy policies and procedures. If you use these links you will need to review those websites directly to view a copy of their privacy policies.

Social media platforms

You may wish to participate in the various blogs, forums, wikis, and other social media platforms hosted by us and which we make available to you. These platforms are designed to facilitate and share content. We cannot be held responsible if you share personal information on these sites that is subsequently used, misused or otherwise appropriated by another user.

Updates to this Policy

This policy may be updated as and when required, for example, to take into account new laws, changes to our operations and practices, changes in the business environment and technology. The most current version is located on our website www.pam.com.au and can be obtained by contacting our Privacy Officer.

Management of personal information

We take reasonable steps to protect the security of personal information. Our employees are required to respect the confidentiality of personal information and the privacy of individuals, and privacy and data protection training is undertaken. All employees are required to read this policy and understand their obligations in regard to personal information.

We take reasonable steps to protect personal information held from misuse and loss and from unauthorised access, modification or disclosure, for example by use of physical security and restricted access to electronic records, firewalls, the use of encryption, passwords and digital certificates.

We will retain your personal information only as long as necessary to fulfil the purpose for which it was collected, as required by law and the Australian Privacy Principles, or in accordance with our documentation retention policies.

Keeping personal information up to date

We endeavour to ensure that the personal information we hold is accurate, complete and up-to-date. Changes inevitably are required and unfortunately errors do occur from time to time. You should contact us immediately in order to update any changes to the personal information we hold about you.

Access to personal information we hold

You have the ability to seek access to your personal information subject to the exceptions set out in the Privacy Act.

These exceptions would include where:

- it is a frivolous or vexatious request
- information relates to a commercially sensitive decision making process
- access is unlawful
- information would prejudice enforcement activities relating to criminal activities and other breaches of law, or

Denial of access is required or authorised by or under law.

If access is denied we will explain the reason why it is denied.

We will require you to verify your identity and to specify what information you require. A reasonable fee may be charged for providing access. We will advise you of the likely cost in advance.

Complaint Resolution

If you believe that we have failed to deal with your personal information in accordance with the Australian Privacy Principles or this policy, please speak with us so that we have an opportunity to resolve the issue to your satisfaction. If you would like access to your personal information, have any questions about privacy-related issues, or would like a hard copy of the Privacy Policy, you should contact the Privacy Officer in your local office.

Contact Details

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