

## Privacy Policy

### 1. Purpose

We, Our or Us is used to refer to Breathe Accounting

We collect, hold, use and/or disclose personal information relating to individuals (including, but not limited to, customers, contractors, suppliers and employees) in the performance of Our business activities. We recognise the importance of protecting your personal information. We are committed to processing it responsibly and in compliance with applicable data protection legislation in all countries in which We operate. This policy outlines Our general privacy practices in the collection, uses and handling of your personal information.

### 2. Personal Information We Collect

We collect and hold personal information pertaining to our clients, prospective clients, prospective employees, employees, referral sources, contractors, subcontractors and other individuals with whom We have dealings.

The main purposes for which We collect personal information are:

- for legislative requirements;
- to provide professional taxation and advisory accounting services;
- to maintain client contact;
- for administration requirements.

We collect personal information only by lawful and fair means. We will collect personal information directly from you if it is reasonable or practicable to do so.

We may collect personal information in a number of ways, including without limitation: through application forms, by email or other written mechanisms, over a telephone call, in person, through transactions, through our website, through publicly available information sources (which may include telephone directories and through the internet and social media sites).

As part of our professional obligations, we may be required to collect, verify, and retain personal information to comply with the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (AML/CTF Act) and related legislation.

We may collect personal information including identification details (such as name, date of birth, residential address, and identification documents) to verify your identity and meet our legal obligations. In certain circumstances, we may also be required to disclose information about you to government authorities, including AUSTRAC, without notifying you.

We collect, use, store, and disclose personal information only as required or authorised by law, including the AML/CTF Act and the Privacy Act 1988. We take reasonable steps to protect personal information from misuse, loss, unauthorised access, modification, or disclosure.

We may request identification documents and other information from you to verify your identity and assess risks associated with providing our services. If you do not provide the requested information, we may be unable to provide services to you.

Further information about how personal information is handled by AUSTRAC is available on the AUSTRAC website.

### **3. Storage and Data Security**

All reasonable steps are taken to protect the security of personal information held by Us. This includes appropriate measures and materials stored and generated in hard copy. We 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 the third party to itself comply with the applicable data protections laws in all countries in which they operate.

### **4. Accessing your Personal Information**

Individuals are able to access personal information held about them by Us in a prompt and confidential manner by making a request to Us. We treat 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 Us.

Individuals are able to gain access to the personal information that We hold about them by contacting the Manager Administration. All requests will be dealt with in a timely manner.

### **5. Data Integrity**

We will take steps as are reasonable in the circumstances to protect the personal information from misuse, interference, loss and from unauthorised access, modification or disclosure. If the personal information We hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, We will take steps as are reasonable to correct the information.

### **6. Disclosure of Personal Information to third parties and outside of Australia**

There are several circumstances in which We may disclose information outside of Australia. As part of the delivery of Our services, We may be required to disclose personal information to third party service providers located overseas.

We will take reasonable steps to ensure that the third party (located within Australia or overseas) does not breach the applicable Australian or global laws in relation to the personal information disclosed. Any such transfer of personal information does not change Our commitment to safeguard the privacy of personal information and the obligations under the *Privacy Act 1988* and applicable legislation.

## 7. Complaints

Any complaints in relation to the collection, use, disclosure, quality, security and access to your personal information may be made to the Managing Director:

Managing Director

Breathe Accounting

23 Spencer Street, BUNBURY WA 6230

We will take all reasonable steps to resolve the complaint. If an individual is dissatisfied with Our response, they can contact the Australian Information Commissioner. See <https://www.oaic.gov.au/>

## 8. Further Information

For further information about Our Privacy Policy, contact the Manager Administration.

Manager Administration

Breathe Accounting

23 Spencer Street, BUNBURY WA 6230

We may amend the Privacy Policy from time to time. An updated version of this policy will be available on the website.

Revision	Description	Author	Approved By	Approval Date
0	First version	Jacinta Fazey (Manager Human Resources)	Kiko Willers (Director)	12 September 2023
1	Second version	Jacinta Fazey (Manager Human Resources)	Kiko Willers (Director)	14 May 2026