



# Privacy Policy

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## UBTA | PRIVACY POLICY

### 1. INTRODUCTION

This Privacy Policy applies to:

- UBT Accountants Pty Ltd ACN 117 200 594, Registered office: The Precinct, Level 6, 10 Herb Elliott Ave, Sydney Olympic Park, NSW 2127, Australia; and
- any related bodies corporate (**we, us, our**).
  - explains how we collect, hold, use and disclose Personal Information (defined below) regulated by applicable privacy laws and how we comply with the requirements under the applicable privacy laws.
  - applies in respect of all Personal Information collected by us on our websites and any other platforms or applications we may offer with a link to this Privacy Policy, including the Personal Information of clients, member businesses and suppliers. It does not apply to any other information collected by us through any other means.

We may update this Privacy Policy from time to time. The most current version will be posted on <https://ubtaccountants.com/> where this will be updated. It will be effective from the date of posting. Unless otherwise required by law, it is your responsibility to check our website from time to time in order to determine whether there have been any changes.

### 2. THE KIND OF PERSONAL INFORMATION WE COLLECT

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable: (a) whether the information or opinion is true or not; and (b) whether the information or opinion is recorded in a material form or not (**Personal Information**).

Sensitive information is Personal Information which may include, but is not limited to, information or an opinion about an employee's membership of a professional or trade association, or membership of a trade union, or information about any criminal record or employee health information (**Sensitive Information**).

The types of Personal Information we collect about you depends on the circumstances in which that information is collected and can include data collected through our volunteers. The kinds of Personal Information we collect, and hold includes:

- for **users of our website**, contact information such as name, postal address, email address and telephone number, other data about you such as gender, marital status, dietary information, special needs data, passport and frequent flyer data and information about your religious beliefs, as well as data associated with your use of the website, such as bank details for direct debit payments and credit card information, as well as information you submit via online forms and your use of any other platforms or applications we may offer. This may include information about the device you are using, as well as:

- information about which pages you visit and which resources you use on our site
- information about how you got to our site
- your internet protocol address known as your IP address which is used to connect your device to the internet
- your device's operating system and platform
- the type and version of the browser you are using
- browser plug-in types and versions which extend the functionality of your browser, for example Pinterest, Evernote and Adblock
- MAC addresses which are used as network addresses for Wi-Fi and Ethernet
- traffic data, which is aggregated information about the number of visitors, sessions, users and page visits to our site
- geolocation data
- time zone setting
- weblogs
- for our **clients, member businesses** and other **partners**:
  - the client, member business or partner's contact information such as name, postal address, email address and telephone number;
  - information collected when you visit one of our sites, which may include CCTV footage and car registration details;
  - addresses of the site or premises where we are supplying any products and/or services;
  - billing information; and
  - other information relevant to the provision of products and/or services by or on behalf of us to the client, member business or partner's premises;
- for our **suppliers** and **service providers**, names and contact details of individuals working for those suppliers and service providers, who we deal with;
- for **prospective personnel** seeking employment or engagement with us, and where permitted by applicable privacy laws, contact information, curriculum vitae, current employment information (e.g. job title and employer), professional association memberships, criminal record, general health information, religious beliefs and other information about your suitability for employment with or engagement by us; and
- for **other individuals**, name, contact details and any other information relevant to our interactions with you.

### 3. HOW WE COLLECT PERSONAL INFORMATION

#### 3.1 PERSONAL INFORMATION GENERALLY

We collect Personal Information about you where it is reasonably necessary for us to perform one or more of our functions or activities.



We will generally collect your Personal Information from you directly. There are however, circumstances in which we collect Personal Information from third party individuals, business entities and governmental agencies, such as signatories to the GAP Global Limited Amended and Restated Members Agreement (**GAP Global Members**), courts, public and law enforcement agencies, and credit bureaus, regardless of whether such individual, business entity or governmental agency compiled the information itself or received it from other sources.

Where we collect Personal Information from a third party, we will handle that information in accordance with applicable local privacy laws, this Privacy Policy and any obligations we have to that third party.

If you provide to us Personal Information about another person, we are relying on you having addressed all relevant consents, notifications and other requirements to enable us to process the Personal Information for our purpose of collection.

We may collect Personal Information about prospective personnel, by conducting reference and background checks in relation to their application for employment with us from time to time, including searches for any criminal records, employment and education verifications, personal credit history based on reports from any credit bureau and searches of any public records, where permitted by applicable privacy laws.

### 3.2 SENSITIVE INFORMATION

We will only collect, use and disclose Sensitive Information about you where you have provided your consent to the collection of that information, or where we are required or authorised by law to do so. Such Sensitive Data may in certain circumstances include biometric data such as biometric facial scans. In providing any consents to the collection or handling of Personal Information (including Sensitive Information), you consent to us collecting, holding, using and disclosing the information you provide in accordance with the terms of those consents and this Privacy Policy.

### 3.3 IF YOUR PERSONAL INFORMATION IS NOT PROVIDED

If you do not provide us with your Personal Information when requested or if you provide us with inaccurate Personal Information, this may limit the assistance we are able to provide to you, including assistance we are contracted to provide on behalf of a third party. For example, we may not be able to provide the product and/or service you may have requested and may not be able to handle enquiries in connection with those products and/or services or process your job application.

### 3.4 COOKIES

Our website uses a technology called “cookies” and web server logs to collect information about how the website is used including, where available, your IP address, browser type and the geographical location of your computer. We also use Google Analytics to collect details of how you use our site, as well as anonymous data that you enter into our forms. We do this to help us analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices), administer our site and manage your account. Google Analytics doesn't collect information that identifies a visitor to our site. All the information that is collected is anonymous and is only used to improve how our site works. We do not allow Google to make any attempt to establish the identities of any users of our site.



## 4. HOW WE USE AND DISCLOSE PERSONAL INFORMATION

### 4.1 GENERAL PURPOSES

We collect, hold, use and disclose Personal Information about individuals for a variety of business purposes.

These include, without limitation, to:

- monitor and evaluate the performance and security of our website and any other platform or application we may offer, including to:
  - administer our site
  - improve our site to ensure that content is presented in the most effective manner
  - allow you to participate in interactive features of our services when you choose to do so
  - analyse how visitors use our site (including behaviour patterns and the tracking of visits across multiple devices)
  - improve your online experience
- facilitate the provision of our products and/or services to our clients and member businesses who have engaged us;
- facilitate the provision of such other products and/or services that we or others may offer from time to time and provide information about their availability, features and benefits;
- work with and procure goods and/or services from our suppliers and service providers;
- facilitate recruitment and selection of prospective personnel;
- facilitate conferences, training and education programs, and event management;
- provide and manage charitable assistance;
- issue newsletters and provide information on church services or other sponsored events;
- conduct audit, accounting, financial and economic analysis of our business operations;
- respond to enquiries or investigate and resolve complaints;
- protect our legal rights, investigate suspected fraud or other misconduct, or assist law enforcement agencies; and
- comply with our legal and regulatory obligations.

We may also use and disclose Personal Information we collect for other purposes that are permitted, required or authorised by applicable law, which may include:

- purposes which you would reasonably expect and which are related (and, in the case of Sensitive Information, directly related) to the primary purpose of collection of Personal Information; and
- any other purposes for which you have given your consent.



## 4.2 MARKETING

We will only use or disclose your Personal Information for the purposes of direct marketing (e.g. in relation to products and/or services we may offer from time to time) where we have your consent or we are otherwise permitted by law to do so.

You are free to opt out from receiving marketing communications from us, by:

- following the “opt out” process indicated in a marketing communication you have received;
- emailing us at [info@ubtaccountants.com](mailto:info@ubtaccountants.com) at any time requesting that your name and email address be removed from our marketing lists; or
- following such other process that is made available for this purpose from time to time or otherwise as required by applicable law.
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## 4.3 DISCLOSURE OF PERSONAL INFORMATION

In order to perform activities in connection with the purposes described in this Privacy Policy, we may make Personal Information available to other persons or entities, or disclose it to them, as permitted by applicable privacy laws, including:

- our suppliers and service providers, including those to whom we outsource certain of our information technology functions (e.g. cloud service providers). We authorise our suppliers and service providers to use or disclose your Personal Information only as necessary to provide us with supplies or perform services on our behalf, or to comply with legal requirements. We require suppliers and service providers by contract to safeguard the privacy and security of Personal Information they process on our behalf;
- any corporate purchaser or prospect to the extent permitted by law as part of any merger, acquisition, sale of our assets, or transition of service to another provider, as well as in the event of insolvency, bankruptcy, or receivership in which Personal Information would be transferred as an asset of us;
- other related bodies corporate;
- government, regulatory, judicial or law enforcement authorities;
- accountants, insurers, auditors, lawyers and our professional advisers; and
- any other third parties notified to you at or around the time we collect your Personal Information (together, the **Required Recipients**).

We may disclose Personal Information to GAP Global Members and Required Recipients who are located in Australia, Argentina, the Caribbean, North America, Europe, New Zealand, the United Kingdom and the United States.

Therefore, it may be necessary to transfer Personal Information across country borders. Some of the countries to which information is transferred may not have laws regulating the collection and disclosure of Personal Information, or may not provide an equivalent level of protection as your home jurisdiction. Cross-border transfer may still, therefore, be necessary for the conclusion or performance of a transaction that you are requesting, and for the establishment, exercise, and defense of legal claims. In these circumstances, we will take steps to ensure that the recipients of the Personal Information comply with applicable privacy



laws. To the extent permitted by local applicable law or otherwise legally required, your use of our website and any other platform or application we may offer or provision of any Personal Information constitutes your consent to the cross-border transfer of your Personal Information and the other activities identified in this Privacy Policy.

## 5. HOW WE HOLD PERSONAL INFORMATION

The security and confidentiality of your Personal Information matters to us. That's why we have administrative, technical and physical safeguards in place to protect your Personal Information from misuse and loss, and unauthorised access, modification and disclosure.

We hold Personal Information both electronically and in paper form. Unless the law requires otherwise, we take reasonable steps to destroy or permanently de-identify Personal Information if it is no longer required. We provide the option to encrypt all information you submit to us using Secure Sockets Layer ("SSL") technology that helps protect information during transport to our website and any other platform or application we may offer. We also review our security procedures periodically to consider appropriate new technology and updated methods.

Even so, despite our reasonable efforts, no security measure is ever perfect or impenetrable.

## 6. ACCESS TO PERSONAL INFORMATION

You may request access to and correction of Personal Information that we hold about you. Such requests should be made in writing using the contact details at the end of this Privacy Policy. We will consider all requests to access and correct Personal Information within a reasonable time. Unless there are reasons why we cannot provide you with access to your Personal Information (e.g. for legal reasons), the Personal Information we hold about you will be made available to you or corrected within a reasonable time after we receive your request, or as may otherwise be required pursuant to applicable privacy laws.

There is no charge for requesting access to your Personal Information, however, to the extent permissible under applicable privacy laws, we reserve the right to charge reasonable costs for providing access to that Personal Information.

## 7. KEEPING PERSONAL INFORMATION CURRENT AND ACCURATE

We take reasonable steps to periodically review information collection and storage practices to ensure that Personal Information we hold is accurate, up-to-date and complete. However, you should ensure that the Personal Information provided to us is accurate, complete and up-to-date at the time it is provided and you should notify us of any changes to or errors in your Personal Information.

To notify us of changes to or errors in Personal Information that we hold about you, please contact us using the contact details at the end of this Privacy Policy and we will amend our records as appropriate.

## 8. ENQUIRIES AND COMPLAINTS

If you wish to make an enquiry or complaint to us regarding privacy matters, you should contact us in writing using the contact details at the end of this Privacy Policy. We will



endeavour to respond to your enquiry or complaint within 30 days, or as otherwise required pursuant to applicable law.

If we fail to respond to a complaint within a reasonable time or if you are dissatisfied with our response, you should discuss your concerns with an independent adviser or contact your local data protection or privacy regulator.

## 9. THIRD PARTY SITES

Please remember that when you use a link to go from our website, platform or application to another website, this Privacy Policy is no longer in effect. Your browsing and interaction on any other website, including websites which are linked to our website, platform or application is subject to that website's own rules and policies. We are not responsible for the content or the conduct of the organisations accessed via links to such third party websites.

## 10. CONTACT US

You may contact us in relation to privacy matters at:

Postal Address: The Precinct, Level 6, 10 Herb Elliott Ave, Sydney Olympic Park, NSW 2127, Australia

Email: [info@ubtaccountants.com](mailto:info@ubtaccountants.com)

All correspondence attention: UBT Accountants Privacy Officer

Privacy Policy Dated: May 2022

## Supplemental Terms - Jurisdiction Specific

The following are specific provisions which modify the Privacy Policy for certain jurisdictions. The Supplemental Terms should be read together with the Privacy Policy. In the event of a conflict or inconsistency between the provisions of the Supplemental Terms - Jurisdiction-Specific that are relevant to your jurisdiction from which you access our website and/or provide your Personal Information, and the rest of this Privacy Policy, the relevant jurisdiction's Supplemental Terms - Jurisdiction-Specific will supersede and control to the extent of any conflict or inconsistency.

All definitions used in the Supplemental Terms are given the meanings contained in the Privacy Policy, unless otherwise defined in the Supplemental Terms.

### NEW ZEALAND

If you are located in New Zealand, then in addition to the rights of access to, and correction of, your Personal Information as recorded in section 6 of this Privacy Policy, you also have the right to:



- a. provide us with a statement of correction (**Statement of Correction**) sought to your Personal Information; and
- b. request that we attach the Statement of Correction to your Personal Information if we do not make the correction sought.