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# Spry Roughley

CHARTERED ACCOUNTANTS

## PRIVACY POLICY

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## 1. PRIVACY POLICY

- 1.1. Spry Roughley Services Pty Ltd (ABN 44 003 845 832) or any of its associated entities, including but not limited to Spry Roughley & Co (ABN 27 962 527 056), Spry Roughley Financial Planning Pty Limited (ABN 25 133 808 643) and Primrox Office Pty Ltd ATF Primrox Unit Trust (ABN 48 178 871 342) (hereafter collectively referred to as “**Spry Roughley**”) is committed to keeping your information safe and secure in accordance with the *Privacy Act 1988* (Cth) (the “**Privacy Act**”) and the Australian Privacy Principles contained therein. By engaging Spry Roughley’s services or using Spry Roughley’s Website (the “**Website**”), you are giving consent to Spry Roughley to use your Personal Information in the manner set out in this Privacy Policy.
- 1.2. “**Personal Information**” is information we hold which is identifiable as being about you, including but not limited to your personal financial information and details where they are relevant for the provision of the services provided by Spry Roughley.

## 2. COLLECTION OF PERSONAL INFORMATION

- 2.1. Spry Roughley may collect and use the following kinds of information:
- (a) information about your use of the Website (including operating system; version and language; pages viewed while browsing the Website; page access times; and referring website address);
  - (b) information about your personal details (including, but not limited to, name; package details; phone contact details; address information; email; date of birth; username; password; and payment information); and
  - (c) information about the kinds of jobs that you are posting or accepting through the Website (including the type, quantity, price range and how often you make similar transactions).
- 2.2. Personal Information and your personal details may be collected from you in a variety of ways, including but not limited to: when you register for the services; when you interact with Spry Roughley electronically or in person; when you access the Website; and when Spry Roughley provides services to you.

## 3. USE AND DISCLOSURE OF YOUR PERSONAL INFORMATION

- 3.1. Spry Roughley may use your Personal Information to:
- (a) enable your access to the Website;
  - (b) provide to you the services that you purchase or request as a customer;
  - (c) track usage and measure traffic statistics of the Website;

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- (d) receive and/or access information from third party providers for the provision of our services to you;
- (e) contact you regarding your use of the services or services offered by Spry Roughley;
- (f) contact you in relation to comments, complaints, enquiries or dispute resolution;
- (g) collect payments from you;
- (h) communicate with third party providers or associate parties with respect to the provision of the services; and
- (i) send you marketing communications.

3.2. Spry Roughley will not disclose Personal Information about you, unless it is required, incidental or otherwise related to the primary purpose of providing services to you or a third party for which you have consented to by engaging Spry Roughley's services, or using the Website. However, Spry Roughley may disclose your Personal Information to its business partners who assist in providing services to you as a customer.

3.3. Spry Roughley in its sole discretion, may disclose your Personal Information to the extent that it is required to do so by law, in connection with any legal proceedings or prospective legal proceedings, and in order to establish, exercise or defend its legal rights.

3.4. Spry Roughley is not liable for how a third party uses your Personal Information if the Personal Information has been disclosed in accordance with this policy.

## **4. DISCLOSURE OF YOUR PERSONAL INFORMATION OVERSEAS**

4.1. Spry Roughley will transfer Personal Information to someone who is in a foreign country where:

- (a) Spry Roughley reasonably believes that the recipient of the information is subject to a law, binding scheme or contract which effectively upholds principles for fair handling of the information that are substantially similar to the Australian Privacy Principles;
- (b) the transfer is required for Spry Roughley to provide you the services you requested;
- (c) all of the following apply:
  - (i) the transfer is for your benefit;
  - (ii) it is impracticable to obtain your consent to that transfer; and
  - (iii) if it were practicable to obtain such consent, you would be likely to give it; or
- (d) Spry Roughley has taken reasonable steps to ensure that the information which it has transferred will not be held, used or disclosed by the recipient of the information inconsistently with the Australian Privacy Principles.

## 5. SECURITY OF YOUR PERSONAL INFORMATION

- 5.1. It is important that you advise Spry Roughley of changes to your Personal Information that you have provided to Spry Roughley as it is essential that your Personal Information is accurate, complete, and up-to-date in order for Spry Roughley to provide services to you.
- 5.2. Spry Roughley uses reasonable technical precautions and has implemented business processes to protect your Personal Information from misuse, loss, unauthorised access, modification and disclosure. However Spry Roughley is not liable for any unauthorised access to, or dissemination of, this information.
- 5.3. Spry Roughley will take all reasonable steps to destroy or permanently de-identify Personal Information if it is no longer needed for the purposes of providing our services to you and where Spry Roughley is not required to retain that information by law.

## 6. ACCESS TO YOUR PERSONAL INFORMATION

- 6.1. You are responsible to ensure that the information you provide to Spry Roughley is accurate, complete and up-to-date.
- 6.2. By request, you may contact Spry Roughley at [privacy@spryroughley.com.au](mailto:privacy@spryroughley.com.au) and ask to know what sort of Personal Information is held about you, for what purposes, and how it is collected, held, used and disclosed and you may also request access to the information held. Spry Roughley may charge, in its discretion, a reasonable administration fee for this access.
- 6.3. Spry Roughley in its sole discretion may consider that there is a sound reason under the Privacy Act, *Freedom of Information Act* 1982 (Cth) or other relevant law to withhold Personal Information, or not make the requested changes.

## 7. IDENTIFIERS AND ANONYMITY

- 7.1. You acknowledge that Spry Roughley retains, collects and maintains your Personal Information for statistical analysis purposes (whether for commercial or non-commercial purposes). You agree that Spry Roughley may share, distribute and/or transfer information which you have provided to Spry Roughley to third parties, after that information has been de-identified.
- 7.2. Spry Roughley may use cookies on its Website. Cookies are very small files which a Website uses to identify you when you come back to the site and to store details about your use of the Website. Cookies are not malicious programs that access or damage your computer. Spry Roughley uses cookies to improve the experience of people using its Website. If you do not or are unable to accept cookies from Spry Roughley, you may not be able to access the full functionality of the Website.

## 8. SENSITIVE INFORMATION

- 8.1. Sensitive information is defined in the Privacy Act to include information or opinion about such

things as an individual's racial or ethnic origin, political opinions, membership of a political association, religious or philosophical beliefs, membership of a trade union or other professional body, criminal record or health information.

8.2. Sensitive information will be used by Spry Roughley only:

- (a) for the primary purpose for which it was obtained;
- (b) for a secondary purpose that is directly related to the primary purpose;
- (c) with your consent; or
- (d) where required or authorised by law.

## 9. COMPLAINTS ABOUT PRIVACY

9.1. As a valuable customer, if you have any complaints in relation to this Privacy Policy or privacy practice, please contact Spry Roughley by email at [privacy@spryroughley.com.au](mailto:privacy@spryroughley.com.au) or by writing to Spry Roughley at PO Box 913 Parramatta, NSW 2124.

9.2. A complaint should identify whether it is about:

- (a) the collection of Personal Information;
- (b) the use of Personal Information;
- (c) the disclosure of Personal Information;
- (d) the security or storage of Personal Information;
- (e) the accuracy of Personal Information;
- (f) a refusal to give access to or provide information about their Personal Information; or
- (g) a refusal to change or delete Personal Information.

9.3. Spry Roughley values your opinions and takes complaints very seriously. Upon receiving written notice of your complaint about privacy, Spry Roughley will respond quickly to advise you of the outcome following its enquiring into the same. You will also be invited to respond to its outcome. If a response is received, Spry Roughley will assess it and advise if it has changed its view or outcome. If you are unsatisfied with the final outcome, Spry Roughley will advise further options including, if appropriate, making a complaint with the Office of the Australian Information Commissioner.

## 10. MISCELLANEOUS

10.1. No Partnership or Agency

Nothing contained or implied in this Privacy Policy will create or constitute, or be deemed to create or constitute, a partnership between you and Spry Roughley. A party must not act,

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represent or hold itself out as having authority to act as the agent of the other party or in any way bind or commit the other parties to any obligation.

## 10.2. Waivers

In limited circumstances, Spry Roughley may allow you to waive application of this Privacy Policy. A waiver of this Privacy Policy must be in writing and signed by Spry Roughley. Spry Roughley anticipates that the waiver of this Privacy Policy would only be in exceptional circumstances, and Spry Roughley encourages that you consider the circumstances leading to the waiver request prior to submitting such a request.

## 10.3. Governing Law & Jurisdiction

This Privacy Policy is governed by the laws of New South Wales, Australia. In the event of any dispute arising out of or in connection with this Privacy Policy, you agree that the exclusive venue for resolving any dispute shall be Sydney, Australia.

## 11. VARIATIONS TO THIS POLICY

11.1. This Privacy Policy is available online via [www.spryroughley.com.au](http://www.spryroughley.com.au) and by clicking the "Privacy Policy" link located in the Website. Spry Roughley reserves the right to modify or amend this Privacy Policy at any time and for any reason, without notification.

11.2. Spry Roughley updates this Privacy Policy from time to time by posting a new version on the Website. You shall be taken to agree to the Privacy Policy from the time the new policy is posted on the Website.

## 12. CONTACT

12.1. Please contact Spry Roughley if you have any questions regarding this Privacy Policy.

Email: [privacy@spryroughley.com.au](mailto:privacy@spryroughley.com.au)