

Verve Group Privacy Policy

Verve Group 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.

Verve Group is an Australian professional services firm. In this Privacy Policy, 'Verve Group', 'we', 'us' and 'our' mean all firms carrying on business under the name of Verve Group and includes all partnerships, trusts and corporate entities.

This Policy outlines the obligations Verve Group has in managing the personal information we hold about our clients, potential clients, contractors and others, in order to comply with the Privacy Act. The Privacy Act does not apply to acts or practices 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.

Information we collect

The main types of information we may collect and hold includes (but is not limited to) personal information about:

- clients, business associates and potential clients and their employees
- suppliers and their employees
- prospective employees
- contractors, and
- other people who come into contact with a member of the Verve Group.

In this Policy the Verve Group means:

- each Verve Group entity and associated entity

Personal information we collect

As a provider of accounting, advisory, and wealth advisory 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, insurance cover and superannuation
- Health information (for some types of insurance cover)
- Details of your investment preferences and aversion or tolerance to risk (if a wealth advisory client)

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 or financial service 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.

We may also use personal information to market and promote other services we offer, invite you to events or distribute articles or publications. You can opt out from receiving this communication from us by request.

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 <http://vervegroup.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.

Verve Group Alumni

Any personal data that you submit to us will only be used to maintain contact with you, and will not be disclosed to a third party without your consent.

Use of personal information

We collect personal information for a variety of reasons including:

- to provide professional services
- to respond to requests
- to maintain contact with our clients and other contacts (including Alumni)
- to market our services and products
- for administrative services
- for recruitment purposes
- for the engagement of service providers, contractors and suppliers relating to the operation of our businesses
- to comply with our legal obligations; and
- to help us manage and improve our services

We may use and disclose your personal information for the primary purpose for which it is collected, for reasonably expected secondary purposes which are related to the primary purpose, and in other circumstances authorised by the Privacy Act.

Disclosure of personal information

In providing our services we may need to disclose personal information to a third party. This will be done to the extent that it is permitted by law and set out in this Policy.

Examples of the types of third parties we may disclose personal information to include

- member organisations of the Verve Group,
- companies or individuals contracted to assist us in providing services or who perform functions on our behalf (such as mailing houses, specialist consultants, barristers and solicitors, contractors or temporary employees to handle peak period workloads, information technology service providers, superannuation fund trustees, insurance providers, fund managers and other product providers)
- courts, tribunals and regulatory authorities, as required or authorised by law
- auditors or compliance officers, as required by Law or Professional Associations
- anyone else to whom you consent, such as banks, accountants and other financial institutions.

The Corporations Act has also provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you. This may involve the disclosure of your personal information.

Where you engage us to attend to your tax affairs we will assume (unless you advise otherwise) that you have specifically authorised us to deal directly with the Australian Tax Office (the "ATO") regarding day to day type matters. If, in the course of our dealings with the ATO, they request information regarding you that we believe is outside of such matters, e.g. Tax Office audit, we will request your specific authority before complying with their request.

If we are required by law to disclose information about you or your organisation, we must cooperate fully. However, where possible we will advise you of this fact.

We also collect personal information from other organisations and individuals, and deal with that information in accordance with this Policy.

Sending information overseas

It may be necessary in order to perform our services to send your personal information to recipients in the Philippines and Vietnam. In this case we will take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles in relation to the information. There may be circumstances in which the disclosure of the information is required or authorised by Australian law or a court/tribunal order, or where you have given your direct consent to disclose it.

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.

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 <http://vervegroup.com.au/> and can be obtained by contacting Verve Group.

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

Privacy Officer
Verve Group
1/609 Anzac Highway
Glenelg North SA 5045
(08) 8120 4877