

# Bray & Associates Pty Ltd Privacy Policy

Bray & Associates Pty Ltd respects and values privacy and protects the personal information of others, including clients, employees, contractors and other individuals. This privacy policy outlines how we collect, use, disclose, store and otherwise manage your personal information and comply with our obligations under the Privacy Act 1988.

## Why & How We Collect Your Information

The main purposes for which we collect personal information are:

- - where it is necessary for us to provide our services;
- - to maintain contact with clients;
- - to keep clients and contacts informed of the services we offer and of current developments;
- - to notify clients and contacts of events, services and service offers;
- - for recruitment and employment (including expressions of interest in working for us);
- - for administration and management purposes; and
- - to provide you with information about other services we offer that may be relevant to you.

Generally we will collect personal information directly from you. Sometimes it may be necessary for us to collect your personal information from a third party, or from a publicly available source. We will only collect personal information in that way where you have consented, you would reasonably expect us to collect personal information in that way, or if it is necessary for a specific purpose in the performance of our services.

We may also collect personal information about you from your use of our websites and information you provide to us through contact mailboxes or through the registration process on our websites.

## Information Collected

The type of personal information which we will ordinarily collect includes your name, business contact details, email, job title and interests. Where relevant, we may ask you for other information. In particular, in order to perform our services, it may be necessary for us to collect bank account details, tax file numbers, details of directorships, shareholding or other investments, superannuation and insurance details.

We will not usually seek to collect sensitive information (e.g. data relating to professional memberships, race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation) from you. If it is necessary for us to collect sensitive information, we will obtain your explicit consent to collect and use such information.

If you do not wish to provide certain information you can refuse to do so. Please be aware failure to provide information may inhibit the provision of professional services. In this instance, we will advise you, and you can then decide whether you wish to continue with our services.

## How We Use the Information

We will only use your personal information to perform professional services, respond to your requests or to provide you with further information about Bray & Associates Pty Ltd.

We may use your information to market our services, including by email. You will have the opportunity to elect not to receive further marketing information from us by emailing [mail@bray.com.au](mailto:mail@bray.com.au). We will endeavour to process your request within 21 days. Alternatively, if we have contacted you by email, you may notify us that you do not want to receive further marketing information from us.

We will hold your personal information for only as long as is required to fulfil the purposes for which it was collected or as required by law.

We may share your personal information with third parties who we contract to assist us to provide the services requested by you. Those third parties may include service providers who assist us in performing our services such as mailing houses, our professional advisers, third parties for the purpose of verification of accounts payment processes, experts who are contracted as part of your engagement. We require that these organisations protect your information in the same way we do. We will never sell your personal information.

We may also store, process or back-up your personal information on computer servers or networks which are located overseas or in 'the cloud', including where services are performed by service providers who are located overseas. Where your personal information is provided to overseas entities, we will take all necessary steps to ensure that the security of the information is maintained and that it is used consistent with this policy and our obligations under the Privacy Act.

### **Use of Cookies**

You do not have to provide us with any personal information if you are a visitor to our website and you may choose to remain anonymous or to provide us with a pseudonym if you do not wish to reveal your identity. However, you should be aware that by remaining anonymous, or in providing a pseudonym, we may be unable to properly provide services and advice to you; or the nature and extent of that advice may be limited. We may also be unable to properly respond to any request, particularly in the event that we may have a conflict of interest or concern in relation to the dissemination of information to an unknown party. We use cookies on our website. These are small text files that are placed on your computer when you visit our website. We use Cookies to monitor the traffic to the various pages on our website so that we can improve its relevance to our clients. Most of this information is aggregated and used for statistical purposes. The information we collect in this manner, e.g. Internet provider, date and time, search phrases, or referring websites is not reasonably personally identifiable.

Most browsers are set up to accept cookies however if you do not wish to receive any cookies, you may be able to change the settings of your browser to give you greater control over this.

We also collect some information about your use of our website. Much of this information will not be personal as it will not reveal your personal identity.

You may choose to provide us with personal information in some circumstances when you access our website, including where you wish to subscribe to our newsletters, request services, ask us to respond to queries or correspondence, or apply for work. If you provide us with someone else's personal information, you should only do so if you have their authority or consent. You should also take reasonable steps to inform them of the matters set out in this Privacy Policy.

### **Blogs, Forums, and Other Social Media**

Our website may host various blogs, forums, and other social media applications or services that allow you to share personal information and content with other users ('Social Media Applications'). Any personal information or content that you contribute to any Social Media Applications can be read, collected and used by other users over whom we may have no control. We are not responsible for any use, misuse or misappropriation by other users of any personal information or content that you contribute to any Social Media Applications.

Our website may include links to third party websites. If you access those websites (even via a link from our website) you will be subject to their privacy policy. You may wish to consider the privacy policy of the third party website providers, which Bray & Associates Pty Ltd will not be taken to endorse or accept by providing a link from our website.

### **Security of Your Information**

We will take reasonable commercial measures to ensure the security of your personal information, whether kept in electronic form or hard copy.

We use a range of physical and electronic procedures to ensure the privacy of your personal information is safeguarded. These include restricting physical access to our offices, maintaining a secure database system, passwords, encryption and firewalls. However, the internet is not secure and we cannot guarantee the security of any information sent to us via the internet.

### **How You Can Access Your Information**

If you are a client of Bray & Associates Pty Ltd, in most cases you can access the personal information we hold about you by contacting the Director who manages your relationship. Otherwise, you may contact the Office Manager using the contact details below. Requests will be dealt with as quickly as possible and we will endeavour to respond within 21 days. In some circumstances we may

refuse to give you access to personal information and in these circumstances we will explain why (e.g. it may be a conflict of interest to provide the information).

If you believe that any personal information which Bray & Associates Pty Ltd has collected about you is inaccurate, incomplete or not up-to-date, please contact us and we will take reasonable steps to correct it in accordance with the requirements of the Privacy Act.

### **Changes to our Privacy Policy**

Bray & Associates Pty Ltd works in a dynamic business environment and from time to time it may be necessary to review our privacy policy.

You will always be able to find the current version of our privacy policy on our website.

In the event that any changes to our privacy policy will have an adverse effect on you, we will place a notice on our website.

### **Complaints**

We are committed to providing clients whose personal information we hold, a fair and reasonable system for the handling of their complaints.

If at any time you have any complaints in relation to privacy, please contact the Office Manager in writing. We will address any concerns you have through our complaints handling process. We will endeavour to respond to your complaint within 30 days.

### **How to Contact Us**

You may request further information about the way we manage your personal information by emailing Office Manager at [mail@bray.com.au](mailto:mail@bray.com.au) or by writing to Office Manager, Bray & Associates Pty Ltd, Level 2, 23-25 O'Connell Street SYDNEY NSW 2000.