Privacy Policy

Count Limited (ACN 126 990 832)
As adopted by the Count Board

1. Privacy Policy

1.1 Count Limited and its related bodies corporate (collectively '**Count**', 'we', 'us', 'our') respect your privacy and are committed to protecting your privacy. We understand the importance you attach to information that identifies you (your 'personal information') and we want to help you protect it.

1.2 We are bound by, and committed to supporting, applicable privacy legislation including the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy ('Policy') explains how we collect, hold, use and disclose your personal information that we may obtain when you submit information to us in person, by mail or email or by visiting our website.

2. How do we collect and hold personal information about you?

2.1 We collect personal information from you in a variety of methods. Examples of the way we collect personal information include:

- through communications between you and our representatives or your adviser or accountant;
- your use of our website;
- you completing application forms in relation to products and services;
- through other avenues, where required to meet regulatory requirements and comply with the law;
- you apply for employment with us, and
- through marketing activities which request information from you, such as surveys.

2.2 Because our products and services are often offered by intermediaries such as financial planners, solicitors or accountants, we may collect personal information about you from these third parties.

2.3 You are able to deal with us anonymously or by pseudonym unless it is impractical for us to deal with you where you have not identified yourself or have used a pseudonym. We require certain personal information to be able to provide you with services and information. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request for information.

2.4 We will only collect personal information from you where it is reasonably necessary for us to provide our services to you or to perform our functions or activities.

2.5 We will only collect sensitive information from you with your consent, except in permitted general situations which include:

- the collection of the information is required or authorised by or under an Australian law or a court/tribunal order;
- the collection is necessary to address a threat to an individual's life, health or safety; and
- permitted health situations.

2.6 We may hold your information electronically or physically and have in place appropriate data and physical security measures and protocols to protect that information from loss or from disclosure not contemplated by this Policy.

3. What type of personal information do we collect?

3.1 The type of personal information we may collect from you includes (but is not limited to):

- names, address, email, phone numbers and job titles;
- information in identification documents such as your passport or driver's licence;
- tax file numbers (TFNs) and other identification numbers such as Medicare number;
- date of birth and gender;
- financial information;

- details of superannuation and insurance arrangements;
- sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties;
- bank account details, shareholdings and details of investments;
- educational qualifications, employment history and salary;
- visa or work permit status; and
- personal information about your spouse and dependants.

4. How do we use your personal information?

4.1 We will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement and related services, such as accounting or business advisory services or to meet obligations we may have at law, including in relation to health and safety.

4.2 We may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), monitoring and improving our website, keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

4.3 We may also use personal information we have collected from you for the purpose of marketing our services. If you do not want to receive marketing material from us, you can unsubscribe by contacting us as detailed below:

- For electronic communications, you can click on the unsubscribe function in the communication;
- For hard copy communications, you can email us using the details in the 'How to contact us' section of our website informing us that you wish to unsubscribe http://www.count.au/Contact-Us

5. How do we disclose your personal information?

5.1 Your personal information will only be disclosed:

- to our employees, contractors, consultants, dealers, agents or advisors as required to provide our services to you or for related purposes
- to suppliers and service providers (for example accounting or auditing service providers or our website hosting service providers) in connection with our provision of services to you;
- where you have consented to the disclosure;
- where required or authorised to do so under an Australian law, court or tribunal order, or other governmental or regulatory body or agency;
- in permitted health situations;
- if we believe that the use or disclosure of the information is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body; or.
- in connection with an actual or proposed sale, reorganisation or transfer of all or part of our business, including as set out in clause 16.1.

5.2 We may use, store, process or back-up your personal information on servers that are located overseas (including through third party service providers). The privacy laws in other countries might not be the same as in Australia. However, where we provide your personal information to third parties overseas, we will take such steps as are reasonable to ensure that your information is handled and stored in accordance with Australian privacy laws and this Policy. Currently, we use outsourced service providers in the Philippines, India and Serbia.

6 Access to your personal information

6.1 You can request us to provide you with access to personal information we hold about you by sending us an email: privacy@count.au (no spam please) or writing to us at Level 1, 45 Clarence Street, Sydney NSW 2000.

6.2 We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will not apply to lodging a request for access. Your request to access your personal information will be dealt with in a reasonable time.

6.3 Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.

7 Accuracy and correction

7.1 To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an email: privacy@count.au (no spam please) or writing to us at Level 1, 45 Clarence Street, Sydney NSW 2000.

8 Our security procedures

8.1 We take your privacy and the privacy of our associated entities and their clients very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification and disclosure.

8.2 We will also deidentify and destroy the personal information we hold about you once our legal obligations cease. Our security procedures are reviewed from time to time and we update them when relevant.

8.3 Please be aware that the transmission of data over the internet is never guaranteed to be completely secure. It is possible that third parties not under our control may be able to access or intercept transmissions or private communications without our permission or knowledge. We take all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

9 Data breach notification

9.1 We are required to give notice to the Office of the Australian Information Commissioner (**OAIC**) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.

9.2 "Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.

9.3 If you are likely to suffer serious harm from a data breach, we will notify you of:

- the nature of the eligible data breach (i.e. how the information was accessed or disclosed);
- the type of information that was accessed or disclosed;
- the steps that we have taken to control or reduce the harm, and those that we plan to take;
- any assistance we can offer you, such as arranging for credit monitoring;
- anything that we can suggest you can do to assist yourself or mitigate the harm;

- whether the breach has also been notified to the OAIC;
- how you can contact us for information or to complain; and
- how to make a complaint with the OAIC.

9.4 We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will publish the notification on our website.

9.5 There are some circumstances in which we do not have to notify you of a data breach. These include:

- where we have taken remedial action before any serious harm has been caused by the breach;
- if you have been notified of the breach by another entity;
- if notification would be inconsistent with Commonwealth secrecy laws; or
- where the OAIC declares that notification does not have to be given.

9.6 Depending on the nature of the breach and the harm, we may voluntarily, inform other third parties such as the police or other regulators or professional bodies.

10 Identifiers

10.1 We will not adopt as our own, any government identifiers you may provide to us such as TFNs and will not store these identifiers on any information.

11 Links to other sites

11.1 We may provide links to other sites for you to access. You should be aware that these other sites are not subject to this Policy or our privacy standards and procedures. You will need to contact them directly to ascertain their privacy standards.

12 Cookies

12.1 Our website may deposit “cookies” in a visitor’s computer. Cookies are pieces of information that a website transfers to an individual’s hard drive for record keeping purposes. Cookies are only sent back to the website that deposited them when a visitor returns to that site.

12.2 Cookies make it easier for you by saving your preferences while you are at our site. We never save personal identifiable information in cookies. Most web browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or to indicate when a cookie is being sent.

13 Changes to our Privacy Policy

13.1 From time to time, we may vary this Policy for any reason. We will publish any changes on this website.

13.2 By continuing to use our website and continuing to provide us with your information, you confirm your acceptance of these changes.

14 Complaints resolution

14.1 We are committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way we have handled your privacy, please send us an email at privacy@count.au or write to us at Level 1, 45 Clarence Street, Sydney NSW 2000.We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe.

14.2 If after receiving our response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at www.oaic.gov.au.

15 Disclaimer

15.1 By using our website, you signify your understanding and agreement to comply with all terms and conditions and confirm your acceptance of the terms of this Policy and consent to the use of your personal information as set out in this Policy.

15.2 If you do not agree with the terms of this Policy, please do not use the website or otherwise provide us with your personal information.

16 Business Assignment

16.1 In the event of a sale, reorganisation or transfer of all or part of our business (**Business Assignment**), you agree to the transfer of your personal information to the purchaser of the business, as reasonably required for the ongoing provision of services to you, and consistent with the terms of this Policy (unless otherwise permitted or required by law).

16.2 In the event of a Business Assignment, to the extent reasonably practicable, you will be notified of the transfer of your personal information.

Document control

Document number:	07
Effective from:	June 2023
Date approved:	June 2023
Approved by:	The Count Board
Last review date(s):	February 2024