

# Privacy policy

PrimusC Consultancy Services Pty Ltd is a proprietary company located in Melbourne.

In this Privacy Policy, 'PrimusC', 'we', 'us' and 'our' refers to any entity owned or controlled by a PrimusC Consultancy Services Pty Ltd.

At PrimusC, we recognise the importance of protecting and maintaining your personal information. We appreciate that you may have concerns about your privacy and about the security, accuracy and confidentiality of personal information. PrimusC is committed to providing you with the highest quality professional service whilst also protecting your privacy. PrimusC abides by the Australian Privacy Principles established under the *Privacy Amendment (Enhancing Privacy Protection) Act 2012* and the *Privacy Act 1988 (Cth) (Privacy Act)*.

This Privacy Policy sets out how PrimusC collects, processes and handles personal information. This policy may be modified from time to time to reflect our current privacy practices.

PrimusC recognises that the General Data Protection Regulations (GDPR) may apply to residents of the European Union. You should contact the PrimusC if you wish to exercise your rights under the GDPR.

## 1. Open and transparent management of personal information

PrimusC manages personal information in an open and transparent way by complying with the Australian Privacy Principles. We will remain open with you about what sort of personal information we hold, how we collect it, and for what purposes we use and disclose this information.

The PrimusC' Privacy Policy is available on our website or may be obtained by contacting PrimusC. If you have any queries or complaints about PrimusC' compliance with the Australian Privacy Principles,

please contact PrimusC using the 'How to Contact Us' information shown below.

If you believe that PrimusC has breached the Australian Privacy Principles, please contact PrimusC in writing. We will respond to you within 30 days. If you are not satisfied with our response, you may take your complaint to the Office of the Australian Information Commissioner.

If you believe that PrimusC has breached the EU's General Data Protection Regulations, please contact PrimusC immediately.

## **2. Anonymity and pseudonymity**

- w. engaging with PrimusC, you have the option of not identifying yourself or you may use a fictitious name. At times this may not be practicable because we need personal information to provide services to you and if you do not provide the information requested, we may be limited in our dealings with you. If it is important to you, and your identification is not required by us, you may request that we deal with you anonymously or by using a pseudonym.

## **3. Collection of solicited personal information**

Our ability to provide you with a comprehensive service is dependent on us obtaining certain personal information. This might include:

- name and contact details
- date of birth and gender
- bank account details
- employment details and employment history
- details of your current financial circumstances, including your assets and liabilities (both actual and potential), income, expenditure, investments, insurance cover and superannuation
- documentation used for identification and verification purposes

Some personal information is considered to be 'sensitive information'. It may be necessary in some instances for PrimusC to collect sensitive information about you, for example, your Tax File Number, professional memberships and health information.

PrimusC will collect information that is reasonably necessary for the primary purpose of providing a professional service to you and also for complying with our legal obligations. If this information is considered sensitive, then unless the law provides otherwise, PrimusC will also require your consent to the collection of this sensitive information. We will only collect sensitive information if it is necessary to provide our services to you.

PrimusC will collect personal information in a fair and lawful manner. In most instances, we will collect personal information from you unless it is unreasonable and impracticable to do so.

#### **4. Dealing with unsolicited personal information**

If PrimusC receives unsolicited personal information that we know could have been collected from you, we will afford it the same privacy protection as if we had solicited this personal information. If the information is not reasonably necessary for one or more of PrimusC' functions or activities or we know that we could not normally have collected the personal information, we will destroy or de-identify the information as soon as practicable, unless it is unlawful or unreasonable to do so.

#### **5. Notification of the collection of personal information**

PrimusC will endeavour to collect personal information directly from you, however, at times PrimusC may need to collect personal information from a third party and when this occurs, we will inform you. We will also be clear about the purpose of the collection, who we might disclose this information to, whether the personal information is required under an Australian law or a court/tribunal order and the main consequences of not collecting this information.

## 6. Use or disclosure of personal information

PrimusC will not use or disclose personal information collected by us for any purpose other than the primary purpose for which it is collected, unless you would reasonably expect us to use or disclose the information for a secondary purpose or your consent has been obtained to use the information for additional purposes. Exceptions to this include where disclosure is:

- required by superannuation fund trustees, insurance providers, and product issuers for the purpose of giving effect to your financial plan and recommendations made by us
- required by law or for inspection to ensure compliance with mandatory professional standards
- reasonably necessary to assist a law enforcement agency
- external service providers for the purposes of audit, peer reviews, legal advice, consultancy, outsourced administration, issuing statements or handling mail
- required by reporting entities for the purpose of complying with the Anti-Money Laundering and Counter-Terrorism Financing legislation
- permitted under the Australian Privacy Principles

Where PrimusC has collected the information from you, we may use this information for the purpose of direct marketing, to conduct surveys, to notify of seminars and other events, to seek your feedback and for any other business-related purposes.

## 7. Direct marketing

PrimusC may use or disclose the personal information we hold about you for the purpose of direct marketing, such as articles that may be of interest to you, if there is a reasonable expectation that your personal information will be used for this purpose and you have not opted out of receiving direct marketing communications from us, or where you have provided your consent.

PrimusC will not directly market to you using information that is considered sensitive unless you have provided consent.

## **8. Cross-border disclosure of personal information**

PrimusC may transfer or store your personal information outside Australia. If we engage with or are required to send personal information to an overseas entity to fulfil the purpose for which the personal information was collected (or a related or ancillary purpose).

If we do disclose personal information to an overseas recipient without your consent, we will take reasonable steps to ensure that this recipient does not breach the Australian Privacy Principles or a similar applicable law in relation to that information.

## **9. Adoption, use or disclosure of government related identifiers**

PrimusC will not adopt, use or disclose government agency identifiers, for example, tax file numbers, as our primary means of identifying you unless it is required or authorised by or under an Australian law or a court/tribunal order.

## **10. Quality of personal information**

Our goal is to ensure that, at all times, the personal information we collect, hold, use or disclose is up to date, accurate and complete. We will take reasonable steps to correct personal information. If you become aware, or believe, that any personal information we hold is inaccurate, incomplete or out of date, please contact PrimusC using the 'How to Contact Us' information shown below.

## **11. Security of personal information**

PrimusC takes the security of your personal information very seriously. We have implemented significant measures and precautions to protect the personal information we hold (electronic and physical)

from such risks as misuse, interference and loss, and from unauthorised access, modification or disclosure. We take reasonable steps to destroy or permanently de-identify any personal information no longer required.

## **12. Access to personal information**

Individuals may at any time request access to personal information that PrimusC holds about them. Where possible, we will provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held. If PrimusC were to refuse to give access to the personal information, or in the manner requested, we will provide written notice of the reasons (unless unreasonable to do so) and details should you wish to complain about the refusal. Generally, a refusal will only be in cases where denying such access is permitted under the Australian Privacy Principles or is otherwise lawful.

All requests for access to personal information should be in writing to PrimusC. We will respond to your request within a reasonable period (but not more than 30 days) after the request is made. PrimusC may charge a fee for supplying personal information.

## **13. Correction of personal information**

If PrimusC holds information about you for a purpose and knows that the information is inaccurate, out of date, incomplete, irrelevant or misleading we will take steps to correct the information. If you request us to correct the information, we will take reasonable steps to do so. If a third party is relying on this information, at your request we will also notify them, unless it is impracticable or unlawful to do so.

If we refuse to make a correction, we will let you know why and the complaint mechanisms that are available to you. If we continue to use this information, you may request us to associate a statement that the information is inaccurate, out-of-date, incomplete, irrelevant or misleading.

All requests for correction to personal information should be in writing to PrimusC. We will respond to your request within a reasonable period after the request is made. We will not charge you for making the request for the correction of personal information.

## **Privacy on our website**

When you visit any part of our websites, we collect statistical data about that visit (e.g. what you looked at, the way in which you moved around the site, etc) which is not personally identifiable. We use this information for statistical purposes and to improve our website. We generally only collect personal information from our website when it is provided voluntarily by you.

## **How to Contact Us**

All requests for access or correction to personal information, privacy complaints, requests for access to personal information, queries in relation to this Privacy Policy, or any other privacy related matter, should be directed to PrimusC as follows:

### **IT Manager**

### **PrimusC Consultancy Services Pty Ltd**

**Suite 102/1 Princess Street Kew VIC  
3101**

**T: (03) 9894 5452**

**F: (03) 8679 0541**

**E: [info@PrimusCconsultancy.com.au](mailto:info@PrimusCconsultancy.com.au)**

We will respond to your request within a reasonable time and in accordance with the requirements of the Privacy Act.

If you have made a privacy complaint and believe that PrimusC has not adequately handled your complaint,

you may complain to the Office of the Australian  
Information Commissioner:

**Office of the Australian Information  
Commissioner**

**GPO Box 5218**

**Sydney NSW 2001**

**1300 363 992**

**[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)**