



Privacy statement

December 2001

PRIVACY STATEMENT

Birdanco Nominees Pty Ltd (ABN 33 009 321 377) practising as RSM Bird Cameron (ABN 65 319 382 479) and RSM Bird Cameron Partners (ABN 36 965 185 036) hereafter referred to as the RSM Bird Cameron Group is covered by 10 National Privacy Principles, the NPP's, as set out in the Privacy Act 1988 (amended by the Privacy Amendment (Private Sector) Act 2000).

To comply with our obligations under the NPP's, we have a Privacy Policy, which sets out how we manage privacy in our firm. You are welcome to receive more information about the Policy.

1. **PRIVACY POLICY**

(For the attention of individuals whose personal information may be collected by this firm).

1.1. **Purpose of the policy**

RSM Bird Cameron Group takes its obligations under the Privacy Act seriously and would like to take all reasonable steps in order to comply with the Act and protect the privacy of the personal information that we hold. This policy sets out how we intend to do so.

1.2. **The personal information that the firm collects**

RSM Bird Cameron Group collects and holds the following personal information –

- Your name;
- Date of birth;
- Address;
- Tax file number;
- Financial data as provided by you to allow preparation of financial statements and statutory returns on your behalf.

1.3. **Why we collect it**

RSM Bird Cameron Group collects, uses and discloses the information in accordance with the Collection Statement. The purpose of collecting personally identifiable information is to allow the RSM Bird Cameron Group to fulfil their contractual agreement with you, namely to prepare financial statements, income tax returns and other financial reports that have been requested of our firm as your accounting and taxation consultants. This information is only obtained from you when you voluntarily provide it to us.

The RSM Bird Cameron Group, as accountants and financial advisors, understands the importance of maintaining the confidentiality of our client information. To maintain our reputation as a professional and efficient firm of the highest integrity, any information provided by you is treated in strict confidence and shall remain confidential.

In addition to the primary purpose of collection identified above, the information may be used for a secondary purpose by being provided to our wholly owned subsidiaries to allow them to inform you about other financial services that may suit your needs.

No information collected in relation to the above will be disclosed to any unrelated third party without your prior approval.

1.4. **Access to your personal information**

RSM Bird Cameron Group provides access to the personal information that we hold about you. Access will be provided in accordance with our *Access Policy*. If you require access to your personal information please contact the Accountant responsible for handling your affairs.

1.5. **Complaints**

If you have any complaints about our privacy practices or wish to make a complaint about how your personal information is managed, please contact the Accountant responsible for handling your affairs. Complaints will be handled under the RSM Bird Cameron Group's Privacy Complaints Policy.

1.6. Storage

We will take all reasonable steps to protect the security of the personal information that we hold. This includes appropriate measures to protect electronic materials and materials stored and generated in hard copy.

1.7. Contract

We do contract out some data storage. We take measures to protect the information by requiring our contractors to work within the framework of the Privacy Act.

2. COLLECTION STATEMENT

The personal information collected is collected by Birdanco Nominees Pty Ltd (ABN 33 009 321 377) practising as RSM Bird Cameron (ABN 65 319 382 479) and RSM Bird Cameron Partners (ABN 36 965 185 036) hereafter referred to as the RSM Bird Cameron Group.

2.1. Use and disclosure

Personal information is collected for the purpose of preparing financial statements, income tax returns and other financial reports that have been requested of our firm as your accounting and taxation consultants.

2.2. Legal reasons why we collect the personal information

We collect the information in order to comply with our legal obligations under the contractual arrangements we have with you and to meet legal requirements you have in regard to taxation and other statutory returns.

2.3. What happens if you choose not to provide the information?

You are not obliged to give us your personal information. However, if you choose not to provide RSM Bird Cameron Group with the personal detail required we may not be able to provide you with the service requested to meet your requirements.

2.4. Access

You can gain access to the personal information the firm holds about you. If you wish to do so please refer to our Access Policy or contact the accountant responsible for handling your affairs.

2.5. Sources of information

Where possible, the RSM Bird Cameron Group will collect the information directly from the client. In some cases, our clients are children or young people. It may be more appropriate to collect information from the client's parent or appropriate carer.

3. ACCESS POLICY

This policy is directed to those individuals whose personal information is held by our firm.

3.1. Purpose

The purpose of this Policy is to set out how the RSM Bird Cameron Group will provide access to your personal information. The Policy is part of our Privacy Policy and our desire to provide for, maintain and give effect to your right to privacy.

3.2. **Overriding principles**

At all times the conduct under this Policy will be governed by the following principles –

- All requests for access will be treated seriously;
- All requests will be dealt with promptly;
- All requests will be dealt with in a confidential manner;
- Your requests to access your personal information will not affect your existing obligations or affect the commercial arrangements between you and the RSM Bird Cameron Group.

3.3. **Form of Access**

RSM Bird Cameron Group will provide access by allowing you to inspect, take notes of or receive copies or print outs of the personal information the RSM Bird Cameron Group holds about you.

You can make your request in writing by contacting your Accountant.

To obtain access you will have to provide proof of your identity. This is necessary to ensure that personal information is provided only to the correct individuals and that the privacy of others is not undermined.

3.4. **When will Access be denied?**

Access will be denied if –

- the request does not relate to the personal information of the person making the request;
- providing access would pose a serious and imminent threat to life or health of a person;
- providing access would create an unreasonable impact on the privacy of others;
- the request is frivolous and vexatious;
- the request relates to existing or anticipated legal proceedings;
- providing access would prejudice negotiations with the individual making the request;
- access would be unlawful;
- denial of access is authorised or required by law;
- access would prejudice law enforcement activities;
- access discloses a 'commercially sensitive' decision making process or information; or
- any other reason that is provided for in the National Privacy Principles (NPP's) set out under the Privacy Act.

Where possible, the RSM Bird Cameron Group will favour providing access. It may do so by providing access to the appropriate parts of the record or by using an appropriate "intermediary".

Where there is a dispute about the right or forms of access, these will be dealt with in accordance with the RSM Bird Cameron Group's Grievance Policy.

3.5. **Time**

We will take all reasonable steps to provide access within 30 days of your request. In cases where the request is not complicated or does not require access to a large volume of information, we will provide information within 14 days.

3.6. **Costs and Charges**

The RSM Bird Cameron Group will impose reasonable charges in relation to the following –

- Photocopying;

- Delivery cost of information stored off-site – where information is stored off-site, the cost of obtaining access to the information;
- Access to electronic databases.

4. **PRIVACY COMPLAINTS: How we handle privacy complaints (for individual clients)**

4.1. **Introduction**

RSM Bird Cameron Group sees the importance of privacy to the firm, its customers and other stakeholders. As such, RSM Bird Cameron Cameron Group is committed to protecting the privacy of the personal information that we hold. This is part of our firm's –

- (a) Legal obligations under the Privacy Act 1988.
- (b) Ethical and business obligations
- (c) Service to you

RSM Bird Cameron Group places high priority on effectively dealing with any complaints relating to privacy concerns that you may have.

4.2. **Overriding principles**

At all times the conduct under this policy will be governed by the following principles –

- (a) All complaints will be treated seriously.
- (b) All complaints will be dealt with promptly.
- (c) All complaints will be dealt with in a confidential manner.
- (d) The privacy complaint will not affect your existing obligations or the commercial arrangements that exist between this firm and you.

4.3. **Who may complain under this policy?**

If you have provided us with personal information you have a right to make a complaint, have it investigated and dealt with under this policy.

4.4. **What is a privacy complaint?**

A privacy complaint relates to any concern or dispute that you have with our privacy practices as it relates to **your** personal information. This could include matters such as –

- (a) How personal information is collected;
- (b) How personal information is stored;
- (c) How this information is used or disclosed;
- (d) How access is provided.

4.5. **What do I do if I have a complaint about privacy practices?**

RSM Bird Cameron Group resolves grievances at the local level if possible. If you have a complaint about privacy, please contact the Accountant responsible for handling your affairs.

All complaints will be logged on a complaints register.

All complaints should, in the first instance, be in writing. Usually, your contact with the firm will be the proper person to discuss or resolve your complaint, however, if your privacy complaint is not resolved the matter will then be referred to our Privacy Officer (Mr Peter Taylor).

4.6. **Grievance procedure**

The goal of this policy is to achieve an effective resolution of your complaint within a reasonable set timeframe (30 days or as soon as practicable).

Once the complaint has been made, the point of contact can then resolve the matter in a number of ways –

1. *Request further information* – Your initial contact may request further information from you. You should be prepared to give as many details as possible including details of any relevant dates and documentation. This will enable the contact to investigate the complaint and determine an appropriate and useful solution. All details provided will be kept confidential.
2. *Discuss options* – We will discuss options for resolution and if you have suggestions about how the matter might be resolved you should discuss these with your contact. The contact could also suggest other solutions or give examples of how the personal information can be revised or stored in a different way.
3. *Investigation* – The complaint may be investigated. The firm will try to do so as soon as possible. It may be necessary to contact others in order to proceed with the investigation. This may be necessary in order to progress your complaint.
4. *Escalate internally* – If your complaint cannot be resolved, it will be referred to an Executive Partner. This will be discussed with you before the referral.
5. *Discussion with any other parties* – If your complaint deals with the conduct of our employees we will raise the matter with the employee concerned and seek their comment and input in the resolution of the complaint and investigation stage.
6. *The complaint is resolved* – If your complaint is found to be substantiated, you will be informed of the reason for the decision. The RSM Bird Cameron Group will then take appropriate steps to resolve the complaint and prevent the problem from recurring.
7. If the complaint is not substantiated, or cannot be resolved to your satisfaction, but this policy has been followed, the decision of the Executive Partner will be final. Your contact will discuss with you the reasons for the decision.
8. If there is still disagreement your complaint will be dealt with by a mutually agreed independent intermediary.
9. If after all the above steps have been followed your complaint is unresolved, you are free to take your complaint formally to the Federal Office of the Privacy Commissioner.

4.7. **Records**

The firm will keep a record of your complaint and the outcome. Such material will be confidentially stored.

4.8. **Anonymous complaints**

RSM Bird Cameron Group is unable to deal with anonymous complaints as we are unable to investigate properly and follow up such complaints.

However, in the event that an anonymous complaint is received, RSM Bird Cameron Group will note the issues raised and try and resolve them appropriately. For example, RSM Bird Cameron Group may wish to conduct further training or provide assistance in a given area.

4.9. **Information**

For any further information about this policy, please contact our Privacy Officer (Mica Duncalfe) on (03) 9286 1800.