



HFB Privacy Policy

Purpose

This privacy policy applies to the following entities HFB Accounting Pty Ltd (ABN 85 600 231 105), HFB Advisory Pty Ltd (ABN 48 166 956 841), HFB Eastside Pty Ltd (ABN 65 667 557 173), HFB Super Pty Ltd (ABN 66 600 231 089), HFB Drive Pty Ltd (ABN 23 657 588 773), HFB Private Wealth Pty Ltd (ABN 61 662 303 835), HFB Services Pty Ltd (ABN 26 659 350 893), HFB Corporate Services Pty Ltd (ABN 96 667 929 982), HFB Powerhouse Pty Ltd (ABN 53 662 295 721), HFB Bookkeeping Pty Ltd (ABN 25 613 906 184), collectively known as “HFB”; and any other entity owned or controlled by HFB (‘Related Entity’) in relation to HFB and its Related Entities’ (together ‘HFB’ or ‘we’) operations in Australia. This policy explains how HFB handles personal information.

Given the breadth of our business, there may be circumstances where our handling of personal information differs from that described in this policy. Where this is the case, we will generally provide you with terms of engagement which supplement or extend this policy or separate privacy policies which apply in place of this policy. If you have any further questions in relation to our privacy handling practices, please contact our Privacy Officer at team@hfbgroup.com.au, and reference ‘Privacy Officer’.

Exclusions

This policy relates to HFB’s collection and handling of personal information that is referenced by the Australian Privacy Act 1988 (Cth) (‘Privacy Act’). It is not intended to cover categories of information that are not referenced by the Privacy Act.

The following topics will be covered in this Privacy Policy:

- Collection of personal information
- Use of personal information
- Marketing communications
- Disclosure of personal information
- Disclosure of information outside Australia
- Privacy on our websites and applications
- Security of personal information
- Access to information
- Corrections and concerns
- Effect of policy

Collection of personal information

HFB collects and holds personal information from clients, customers, employees, job applicants, contractors and other individuals. We collect and hold this information for our business purposes.

The main types of personal information HFB collects and holds relate to:

- the contact details and organisational roles of our actual and prospective clients, suppliers and other business contacts. Typically, this information includes names, date of birth, gender, addresses, telephone numbers, e-mail addresses, Internet Protocol addresses’, job titles, occupation and industry;
- personal information collected in the course of providing products and services to our clients (for instance financial details relating to a client or the clients related entities);
- payment details including PAYG Payment Summaries, payslips, and other income earning information, for example payment summaries, super fund statements, statements from banks and

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(07) 3286 1322 team@hfbgroup.com.au PO Box 24 Cleveland	(07) 3506 8220 team@hfbgroup.com.au PO Box 1322 Coorparoo DC	(07) 3216 3900 hamilton@hfbgroup.com.au PO Box 456 Hamilton Central

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financial institutions showing interest received, employment termination payment summaries, receipts for gifts, donations and work-related expenses;

- government-issued identification numbers such as tax file numbers;
- personal information collected in relation to persons who attend seminars or other events we run, sponsor or are otherwise involved in;
- personal information collected when individuals communicate with us (including via email);
- personal information collected from job applicants when they apply for a job with us and individual contractors when performing a role for us (in some instances this may include sensitive information such as health information and/or immigration status if related to the role being applied for or being performed);
- personal information collected from our employees during the course of carrying out our duties and activities as an employer (in some instances this may include sensitive information such as health information if related to the employee's role);

We collect most personal information directly from individuals when we deal with them. The personal information we collect may be provided in forms filled out by individuals, face to face meetings, email messages, telephone conversations, when you use our websites or our social media, or by third parties. If you contact us, we may keep a record of that contact.

In some circumstances, we may take photographs or videos of individuals, such as at seminars or events we run, sponsor or are otherwise involved in.

We may also collect personal information when it is provided to us by third parties, including our clients. This may include personal information contained in materials provided to us in the course of providing products and services to our clients. When this occurs, we rely on the person providing us with that personal information having the right to do so.

Because of the nature of our business, it is generally impracticable for us to deal with individuals on an anonymous basis or through the use of a pseudonym, although sometimes this is possible (for example, when seeking staff or client feedback generally).

Use of personal information

The main purposes for which we collect, hold and use personal information are:

- to provide our products and services;
- to respond to an individual's request;
- to communicate, and maintain contact, with clients;
- to send marketing communications (as described in the 'marketing communications' section below);
- for general management and reporting purposes, such as invoicing and account management;
- for recruitment purposes;
- for purposes related to the employment of our personnel and providing internal products and services to our staff;
- other purposes related to our business (for example, photographs or videos we take at seminars or events may be used for training and promotional purposes); and
- where required or permitted by law, regulation, rule or professional standard.
- If you choose not to provide us with personal information, we may be unable to do such things.

Employee records are not generally subject to the Privacy Act and therefore this policy may not apply to the handling of information about employees by HFB. For information about our practices relating to employee information, please contact us directly.

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Marketing communications

We may collect, hold and use personal information about individuals to send marketing communications to them, including keeping clients and other contacts informed of industry developments, and products and services (including seminars and other events) that we believe may be of interest to them. These communications may be sent in various ways, including by email or other electronic means.

We are currently in the process of changing the way in which we manage permissions for our marketing communications. Like many organisations, and as is permitted under relevant laws, we often rely upon the implied consent of individuals to send them marketing communications. In the future, however, we intend to generally seek express consent from individuals to do so. There may still be limited circumstances in which we rely on implied consent, however, such as where it is impractical to seek express consent but we believe the individual would still wish to receive marketing messages from us.

Individuals always have the opportunity to elect not to receive further marketing communications from us. The opt out options include, amongst others, writing to HFB, PO Box 24, Cleveland QLD 4163, or by emailing us at team@hfbgroup.com.au, and reference 'Privacy Officer'. In cases of written requests please allow 28 days for your request to be processed.

In addition, you may be given the ability to unsubscribe from all marketing communications from HFB at a state level. Doing so will also unsubscribe you from marketing communications from us.

If you do not consent to receive, or unsubscribe from receiving, marketing communications from us, we may still contact you for the other purposes described in the 'use of personal information' section above.

Disclosure of information outside Australia

In addition to disclosures permitted under this policy, we may disclose your personal information to external contractors, third party specialist professionals, other public practitioners, cloud service providers and outsourced service providers (collectively known as "Network Entities"). In part, this is because we may use common systems with those Network Entities to obtain the advice you need or to assist us to provide our services to you.

We may also use overseas facilities or contractors to process, store or backup our information or to provide certain products or services to us. We take care to ensure that HFB Network Entities and other third parties outside Australia to whom we disclose personal information are subject to appropriate restrictions on their handling of that personal information. Due to differences in foreign laws and the nature of some arrangements in place for HFB, however, these restrictions may not be substantially similar to those required under the Australian Privacy Principles, and the Privacy Act (including mechanisms entitling you to seek redress) may not apply.

Any such disclosure of personal information does not change any of our commitments to safeguard your privacy, and the information remains subject to any existing confidentiality obligations.

Disclosure of personal information

HFB does not routinely disclose personal information to other organisations unless:

- use or disclosure is permitted by this policy;
- we believe it is necessary to do so in connection with a product or service we are providing (or, in the case of a partner, employee or contractor of HFB, it is necessary for maintaining or related to your role at HFB);

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- to protect the rights, property or personal safety of any member of the public or a customer of HFB or the interests of HFB;
- some or all of the assets or operations of HFB are or may be transferred to another party as part of the sale of some or all of HFB's business;
- you give your consent; or
- such disclosure is otherwise required or permitted by law, regulation, rule or professional standard.
- We may also share non-personal or de-identified information for research or promotional purposes. We do not sell personal information to third parties.

HFB uses a range of third party providers to help us maximise the quality and efficiency of our services and our business operations (including internal business requirements, such as recruitment and human capital requirements). This means that individuals and organisations outside of HFB will sometimes have access to personal information held by us and may collect or use it from or on behalf of HFB. This may include, but is not limited to, independent contractors and consultants, travel service providers, mail houses, off-site security storage providers, information technology providers, event managers, credit managers and debt collecting agencies.

If you are employed by HFB and you obtain products or services offered by a third party pursuant to an agreement or arrangement between that third party and HFB, such as a credit card provider, we may provide your personal information to that third party, including information that relates to your use of such products and services.

Privacy on our websites and applications

This policy also applies to any personal information we collect via our websites, including hfbgroup.com.au, and/or applications, in addition to personal information you provide to us directly – such as where you make a request or complete a registration form.

In order to properly manage our websites and applications, we may log certain statistics about the users of the facilities, for example the users' domains and browser types. None of this information specifically identifies an individual and it is used solely to ensure that our websites and applications provide the best possible navigational experience for users.

Cookies are used on the HFB website. Cookies are small text files that are placed on your computer by the websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. If you are uncomfortable with the use of cookies, you can manage and control them through your browser, including removing cookies by deleting them from your 'browser history' (cache) when you leave the site. In most cases, you can refuse a cookie and still fully navigate the HFB website.

We may also use other technologies, such as web beacons, to monitor users of the HFB website. These help us gain an understanding of how HFB websites are being used.

If you have registered an account with us, you will be identified by a user name and password when you log into our website or applications. The information we collect about members' use of our websites may be used for measuring use and performance and in assisting to resolve any technical difficulties.

Because HFB wants your user experience to be as informative and resourceful as possible, we provide a number of links to websites and embedded content operated by third parties. HFB is not responsible for the privacy practices or policies of those sites. We encourage you to review each website's privacy policy, especially if you intend to disclose any personal information via that site. A link to another non-HFB website is

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not an express or implied endorsement, promotion or warranty of the products or services offered by or accessible through that site or advertised on that site.

Security of personal information

HFB will endeavour to take all reasonable steps to keep secure any information which we hold about you, whether electronically or in hard-copy, and to keep this information accurate and up to date. We also require our employees and data processors to respect the confidentiality of any personal information held by HFB.

Access to information

We will provide access to personal information upon request by an individual, except in the limited circumstances in which it is permitted for us to withhold this information (for instance, where granting access would infringe another person's privacy).

When you make a request to access personal information, we will require you to provide some form of identification (such as a driver's licence or passport) so we can verify that you are the person to whom the information relates. In some cases, we may also request an administrative fee to cover the cost of access.

If at any time you want to know what personal information we hold about you, you may contact us by writing to: HFB, PO Box 24, Cleveland QLD 4163, submitting a request or emailing us at team@hfbgroup.com.au, and reference 'Privacy Officer'.

Corrections and concerns

If you believe that information, we hold about you is incorrect or out of date, or if you have concerns about how we are handling your personal information, please contact us and we will try to resolve those concerns.

If HFB becomes aware of any ongoing concerns or problems concerning our privacy practices, we will take these issues seriously and work to address these concerns. If you have any further queries relating to our privacy policy, or you have a problem or complaint, please contact our Privacy Officer. If you are not satisfied with our handling of your problem or complaint you may make a complaint to the Australian Information Commissioner (www.oaic.gov.au)

Effect of policy

HFB operates in a dynamic business environment, and we aim to review this policy biannually to keep it current. We may update this privacy policy at any time by publishing an updated version on this website: <https://www.hfbgroup.com.au>.

This policy was last updated 28 February 2025

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