

European Union and United Kingdom General Data Protection Regulation Addendum

If you are an individual residing in the European Union (“EU”) or United Kingdom (“UK”), this General Data Protection Regulation (“GDPR”) Addendum will apply to you in addition to our Privacy Policy.

Individuals residing in the EU and UK have certain rights as to how personal data is obtained and used. We comply with the principles of data protection set out in the GDPR.

We are a Data Controller for the purposes of the GDPR. By consenting to this Privacy Policy we are able to collect and process your personal data in accordance with this Privacy Policy.

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1. How do we collect your personal data?

Most of the personal data we process is provided to us directly by you when you:

- o meet with us for face to face meetings;
- o converse with us by phone or in writing;
- o send us emails or other electronic files including via our MYOB Client Portal;
- o register to use our services on our website;
- o interact with our websites, services, content, and/or advertising and media campaigns; and
- o use or view our website via your browser’s cookies.

We may also receive your personal data indirectly from the following sources:

- o your relatives where it is necessary to collect information from these individuals;
- o your legal or financial representatives; or
- o referees; or
- o publicly available records (including land titles and ASIC records).

In such a case we will take reasonable steps to ensure that you are made aware of the personal data provided to us by the third party.

2. What kind of personal data do we collect?

The types of personal data collected by us are outlined in the “Collection of Information” section of our Privacy Policy.

We collect and process your personal data necessary in order to provide you with our services and/or products. Depending on the circumstances, the following are the types of personal data you might be asked to provide to us:

- o your name and contact information, such as phone number, residential and business addresses, email address;
- o your date of birth and gender;
- o your employment history, job title and current employer details;
- o any information relevant to the provision of our professional accounting, business and taxation services including: bank account details, tax file numbers, Australian Business Numbers, details regarding your investments, shareholdings, assets and liabilities, superannuation, insurance details, government identifiers (including tax file number), and details of any dependents;
- o financial, credit and payment information including:
 - bank account and credit card information;
 - type and amount of credit sought;
 - publicly available information about an individual's creditworthiness;
 - consumer credit liability information including: name of credit provider, type of consumer credit, details of the consumer credit provided;
 - default information;
 - repayment history information;
 - payment information in relation to an overdue payment;
 - new arrangement information;
 - court proceedings information;
 - personal insolvency information; or
 - opinion that a serious credit infringement has been committed by an individual.
- o device and network information (when using our website), such as your IP address an operating system; and
- o the content of your communication with us, such as feedback and technical support requests.

We may also seek sensitive information or information that may infer sensitive information including any professional memberships, health information and criminal records. This information will only be collected after receiving your explicit consent.

3. How do we use your personal data?

We collect and use your personal data for the following reasons:

- o to provide professional accounting, business and taxation services to you, including to:
 - assist you in managing your financial and corporate affairs;

- organise other services on your behalf from third parties related to our accounting, business and taxation services;
- o for internal administration and filing, and managerial purposes;
- o to engage third party service providers, contractors and suppliers;
- o to comply with our legal obligations;
- o to enable you to access and use our website or services;
- o account maintenance;
- o to send you marketing and promotional messages and other information that may be of interest to you, including information sent by, or on behalf of, our business partners that we think you may find interesting;
- o to comply with our legal obligations, resolve any disputes that we may have with any of our users, and enforce our agreements with third parties.

4. How will we process your personal data?

We collect, store and process personal data where we have a lawful basis to do so. The lawful basis for which we collect your personal data depends on the data we collect and how we use it. The lawful bases that may apply to our processing activities are:

- o **Consent** – you have given clear consent for us to process your personal data for a specific purpose. This purpose is outlined in our engagement letter to you.
- o **Contract** – the processing of your personal data is necessary for the performance of an agreement with you to provide our products and/or services.
- o **Legal obligation** – the processing of your personal data is necessary for us to comply with the law (not including contractual obligations).
- o **Vital interests** – the processing of your personal data is necessary to protect someone’s life.
- o **Public task** – the processing of your personal data is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law.
- o **Legitimate interests** – the processing of your personal data is necessary for our legitimate interests or the legitimate interests of a third party except where such interests are overridden by your prevailing legitimate interests and rights.

We will not process any of your personal data that is considered “sensitive data” under the GDPR unless we have obtained your explicit consent, or if it is being collected subject to and in accordance with the GDPR.

5. How do we share personal data with third parties?

In certain circumstances, we may share information with affiliates, partners, service providers, authorised resellers and distributors and relevant third parties in order to fulfil the limited purposes described above. When we share your personal data, we require the recipient to protect your personal data in compliance with the law.

6. Do we transfer your personal data outside the EU?

We will transfer or disclose personal data outside the EU and UK, almost exclusively to Australia and the servers of our digital service providers.

Data transfers are made in order provide the products and services we offer you. When we transfer personal data outside the EU or UK, we take reasonable steps to ensure that the recipients of such information do not breach the GDPR Privacy Principles, and where appropriate the privacy laws of the relevant jurisdiction in relation to that information including by entering into binding contractual arrangements with any relevant third parties.

7. How do we keep your personal data secure?

Your personal data is primarily securely stored at our offices in Australia. We also employ digital service providers with servers located in other Australian cities such as Brisbane.

We may retain your personal data to fulfil the purposes outlined in this Addendum and our Privacy Policy for as long as needed, as allowed, or as required by law. For instance, we may retain and use your personal data as necessary to comply with our legal obligations, resolve disputes, prevent fraud and abuse and fulfil and enforce our agreements.

In the event of a data breach, we are committed to complying with the requirements of the GDPR. If we detect a high-risk data breach, we will notify you without undue delay and help guide you through steps to ensure better protection.

8. What are your rights in relation to your personal data?

In addition to the rights in our Privacy Policy, you have rights with respect to your personal data under the GDPR. Your rights include, but are not limited to:

- o **Right of access** – you have the right to ask us for copies of your personal data.
- o **Right to rectification** – you have the right to ask us to rectify your personal data you think it is inaccurate. You also have the right to ask us to complete your personal data if you think it is incomplete.
- o **Right to erasure** – you have the right to ask us to erase your personal data.
- o **Right to restriction of processing** – you have the right to ask us to restrict the processing of your personal data.
- o **Right to object to processing** – you have the the right to object to the processing of your personal data.
- o **Right to data portability** – you have the right to ask that we transfer the personal data you gave us to another organisation, or to you.

These rights are not absolute, and some only apply in certain circumstances.

You are not required to pay any charge for exercising your rights.

If you make a request in relation to any of these rights, we have one month to respond to you. Please contact us at the details provided at 10 below if you wish to make a request.

9. How do we use cookies?

Cookies are text files placed on your computer to collect standard internet log information and visitor behaviour information. When you visit our websites, we may collect information from you automatically through cookies or similar technology.

We use cookies to support the underlying functionality of our website. Our cookies assist us in understanding how you use our website and facilitate the provision of information to you. We do not use cookies to collect personal data or information that can be associated with you. Our cookies may capture your IP address, the date and time you access our website, device information and browser information.

You can set your browser not to accept cookies, and the above website tells you how to remove cookies from your browser. However, in a few cases, some of our website features may not function as a result.

10. How to contact us with questions?

If you have any questions about our privacy policy, your personal data held by us, or if you would like to exercise one of your data protection rights, please do not hesitate to contact us at:

The Privacy Officer
LeCornu Lewis Hancock
GPO Box 446
ADELAIDE SA 5001

T: +61 8 8232 1133
F: +61 8 8232 0088
E: privacy@llh.com.au

11. How to complain to the supervisory authority?

Should you have any concerns, or wish to exercise your rights in relation to our collection and/or processing of your personal data, then in addition to the process set out in the "Questions and Complaints" section of our Privacy Policy, you have the right to complain to the supervisory authority:

United Kingdom
I n f o r m a t i o n
Commissioner's Office
Wycliffe House
Water Lane
Wimslow, Cheshire SK9
4AF
UNITED KINGDOM

T: +44 303 123 1113
W: www.ico.org.uk

Ireland (for EU Customers)
Data Protection Commission
21 Fitzwilliam Square South
Dublin 2, D02 RD28
IRELAND

T+353 578 684 800
W: www.dataprotection.ie