

## PRIVACY POLICY

### 1. INTRODUCTION

This Privacy Policy explains how we, BNR Partners Pty Ltd (ABN 85 354 278 697) (“BNR Partners”, “we”, “us” or “our”) collect and handle your personal information when you use our services, when you visit us or otherwise interact with us online or offline.

This Privacy Policy applies to our website visitors, service users, clients, service providers, partners, job applicants, members of the public, or others who visit us or interact with us online or offline (each referred to as, “you”, “your”). This policy applies to you as an individual even if you act as a representative of an organisation (e.g. your employer).

This Privacy Policy does not apply to, and we are not responsible for, the privacy practices of any third-party providing services which may be associated or linked with our services and we recommend that you review the privacy policy of any such third-party that asks you to provide or otherwise handles your personal information.

This policy provides information only as required under data privacy laws and it is not intended, and must not be relied on, as a representation, warranty, contract or an acknowledgement of a duty of care.

Please read this policy carefully. If you have any questions or if you do not understand anything explained in it, please contact us.

### 2. WHAT TYPES OF PERSONAL INFORMATION DOES BNR PARTNERS COLLECT?

For the purposes of this Privacy Policy “personal information” has the meaning set out in the Privacy Act 1988 (Cth) and, in general terms, means information or an opinion about an identified, or reasonably identifiable, individual, whether true or otherwise. It does not include de-identified information where you are not reasonably identifiable, as determined in the circumstances.

The term “sensitive information” includes information about your health, racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal history, genetic information, biometric templates and biometric information.

The types of personal information we handle about you will depend on the type of dealings you have with us and may include (but are not limited to):

- Name, email addresses, postal or residential addresses, phone numbers, and facsimile numbers;
- Date of birth, gender and other background information;
- Details of your enquiry and call recording data, if you contact us, and your matter details if you become our client;
- Tax file number (TFN) as authorised under taxation law, personal assistance law or superannuation law;

- Australian Business Number (ABN), Medicare, passport or driver's licence number as is reasonably necessary to verify your identity;
- Your identity verification information obtained by our third party identity verification service provider including the verification of your official identity documents with the official record holder as envisaged under the Identity Verification Services Act 2023 (Cth) ("Official Record Verification"), liveness detection from your selfie, and your biometric information derived from your selfies or a video and the photo on your official identity document used by our third party service provider to establish a match;
- If we provide a 'designated service' for the purposes of the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) ("AML/CTF Act"), any personal information reasonably required to conduct customer due diligence, verify beneficial ownership or control of an entity, determine authority to act, undertake proof-of-identity checks, and to otherwise comply with our obligations under the AML/CTF Act;
- Financial information including, amongst other things, information about your assets, liabilities, income, expenditure and other finances, bank account details, shareholdings and details of investments;
- Personal information about your spouse and dependents and other family relationships;
- Details of superannuation and insurance arrangements;
- Job title, educational qualifications, employment history, salary, employment references, visa or work permit status;
- Monitoring data such as CCTV footage when you visit our premises;
- Device, browser, usage and other data relating to your use of online services; and
- Sensitive information (with your consent or otherwise in accordance with the Privacy Act) such as health information or membership details of professional or trade associations or political parties.

We note that you are under no obligation to provide any of the above personal information to BNR Partners. However, we may not be able to provide certain services to you in the absence of such information.

### 3. HOW DOES BNR PARTNERS COLLECT YOUR PERSONAL INFORMATION?

Generally, BNR Partners will collect personal information provided by you, for example, when we deal with you in person or over the phone, when you send us correspondence, when you complete questionnaires or forms or when you subscribe to our publications.

If you apply for employment with BNR Partners we will collect personal information directly from you such as your name, contact details, qualifications, resume, employment history, training records and contact details of referees.

We may also collect information about you from other people or organisations, for example, from your other professional advisors or consultants, your referees, a confirmation of your ID verification from our third party identity verification or customer due diligence service providers, company registers, official public records, your employer when you engage with us in your professional capacity, law enforcement, for example, in connection with a criminal record check, from government or regulatory bodies as permitted by law and other third parties.

BNR Partners may also collect personal information automatically through your use of our website (for example, where you make an inquiry in relation to our services via our website, complete any of our on-line forms or if you register for any of our services or subscribe to any of our firm publications).

We deploy cookies, pixels and similar technologies to track certain events and your online actions and behaviour when you access our online properties. For example, pixels sit on our website and load each time you visit. This event is recorded on our server and helps us count visitor numbers. Cookies are small files that store information on your device and enable us to recognise your device across different websites or browsing sessions, by logging your browsing history under a unique cookie ID assigned to your device.

BNR Partners may also obtain personal information from social media, official public records, and other public sources, or may itself generate personal information about you in the course of providing its services.

We will rely on the information provided by you as accurate, complete and up to date, and we will be grateful if you would inform us of any changes without delay. Providing incorrect information to us could, among other things, prevent us from meaningfully responding to your enquiry or providing services requested by you.

If you provide to us another person's personal information, please only do so if they would reasonably expect it or with their consent.

#### 4. WHY DOES BNR PARTNERS NEED YOUR PERSONAL INFORMATION?

BNR Partners collects, holds, uses and discloses your personal information where it is necessary for our business functions or activities, including:

- To provide you, or an entity with which you are connected, with tax and accounting compliance and advisory services as well as any associated services. We may ask for your TFN to provide our services under relevant taxation law. <sup>1</sup> It is not an offence to choose not to provide your TFN, but this may prevent us from providing our services;
- To verify your identity where reasonably required for our functions or activities. For example, if you wish to become our client, we initiate a verification of your identity to satisfy the requirements of the Tax Practitioners Board and the Tax Agent Services Act 2009. Under the Privacy Act, we must not use your government related identifiers, such as driver's licence or passport number, for any other purpose. However, typically, we do not handle these documents and instead we use a third party identity verification service provider who verifies your identity by way of Official Record Verification, liveness check and facial biometric verification. When we initiate an identity check, our third party service provider will send you a communication seeking your consent for ID verification through Official Record Verification and biometric verification and providing instructions on how to complete your ID check. You will be asked to provide your information, a copy of your official identity document and photos or a video of your face. Our third party service provider will handle all your personal information to carry out your ID check. Once successfully completed, we will receive a confirmation of your liveness check and your biometric ID check, but we do not receive your biometric information. We do not receive the result of the Official Record Verification but rather an identity opinion about the matching of the biographical information on your identity document with the corresponding records held by the document issuing agency.

You do not have to consent to our third party service provider's ID verification, but any alternative ID verification may involve more time and information required from you;

- If we provide you with a 'designated service' for the purposes of the AML/CTF Act, to conduct customer due diligence, verify beneficial ownership or control, determine authority to act, undertake proof-of-identity checks and otherwise comply with our reporting obligations under the AML/CTF Act;

- For our own internal accounting and administrative purposes, managing our service providers including event coordinator, website host, cloud storage provider, our professional adviser, keeping appropriate records, resolving complaints, seeking your feedback, resolving disputes, and similar activities;
- To establish and maintain a professional relationship with you or an entity with which you are connected. We may use our record management systems and engagement tools to identify opportunities and contact you;
- To contact you from time to time to ensure the completeness and currency of your personal information where this is reasonably necessary for our functions and activities.
- To invite you to attend events, functions or training seminars conducted by us;
- To provide our online services and interact with you via our website and other online channels. Our systems automatically collect and provide information necessary to deliver our online services to your device. If you block cookies and similar technologies in your browser, some of our online services may be reduced; <sup>1</sup> Tax Agent Services Act 2009 (Cth)
- To determine your eligibility and suitability to be employed or otherwise engaged by us. We use your government related identifier information only where reasonably necessary to verify your identity as part of recruitment and may ask for your TFN to set up your "pay as you go" income tax withholding. <sup>2</sup> It is not an offence to choose not to provide your TFN, but this may prevent us from withholding the correct amounts of tax and you may be taxed more;
- To comply with our legal and regulatory obligations; and to exercise our legal rights;
- We may contact you or display ads for direct marketing purposes to promote our and our partners' services, events and activities. We will use profiling for personalisation and targeting, where appropriate, based on information known, observed or inferred from your activity or information about you provided by our third-party marketing and advertising partners.
- Undertaking research and analytics, for example, service usage metrics, reviewing your feedback, improving our services, quality assurance, publishing statistical reports, and other research.
- Maintaining physical security and health and safety on our premises, for example, enquiring about the purpose of your visit, where appropriate, deploying physical access control measures, managing accidents and incidents, and similar activities.

- Assisting law enforcement and other public authorities in detecting, preventing and investigating crime or breach of the law in accordance with the law.

We will update this policy to include any new purposes from time to time and we will obtain your prior consent for such new purposes where we are required to do so at law. We may not require your prior consent if the secondary purpose is related to our primary purpose and reasonably anticipated by you or otherwise authorised or required by law.

## 5. TO WHOM CAN BNR PARTNERS DISCLOSE YOUR PERSONAL INFORMATION?

We may disclose your personal information to third parties where this is necessary for us to provide you with the services you have requested, where you have authorised us to do so or where otherwise necessary for our functions and activities. We restrict any disclosure on a “need to know” basis. For example, we may disclose your personal information to:

- Your referrer, if you are referred to us by a person or organisation;
- specialist tax advisors, bookkeepers, accountants, insurers, lawyers, auditors and other professional advisers, if we refer you to them;
- your representative such as parent, next of kin or another third party acting for you or in your interest;
- a person, organisation or agency who can verify information about you or provided by you, where appropriate;
- your principal such as your employer when you engage with us in your professional capacity;
- our third party service providers who work with us to support and enable the operation of our business and the delivery of our services (for example, website hosting providers, payment processors, security service providers, technology platforms, approved artificial intelligence and automation platforms etc.);
- our accountants, solicitors, business advisors, debt collectors and consultants who assist us with a legal, accounting and similar matter;
- our partners who we collaborate with in relation to events, marketing, services and other activities;
- your bank or payment provider for example in connection with your payment of our fees;
- auditors for our annual and ad hoc audits, as required by law or good practice;
- a requestor where it is reasonable in the circumstances to disclose your personal information in complying with a personal information access request;
- our third party identity verification service provider who may will contact you to carry out an ID check and who may share the details of your official identity documents with Commonwealth of Australia represented by the Attorney-General's department for the purposes of Official Record Verification;
- our third party service and platform providers who support us to comply with our obligations under the AML/CTF Act;
- a third party in connection with a corporate transaction such as a merger of our organisation;
- law enforcement if we are compelled or permitted by law to provide your information;
- regulators, government agencies, courts, tribunals and law enforcement bodies where reasonably required or authorised by law, including in connection with our obligations under the AML/CTF Act, and other regulatory requirements;
- as otherwise required or authorised by law, under a binding disclosure request, court order or with your consent;
- another third party with your consent.

We take reasonable steps to choose reliable service providers who hold your personal information on our behalf. Other than that, whilst we take reasonable steps to implement appropriate measures to safeguard your personal information in the hands of third parties, we are not responsible for third parties.

## 6. WHEN WILL BNR PARTNERS USE PERSONAL INFORMATION FOR DIRECT MARKETING?

BNR Partners may use your personal information for the purposes of direct marketing reasonably expected by you or with your prior consent.

In each communication, we will provide you with the opportunity to opt out of receiving such communications at any time.

## 7. WHEN WOULD YOUR PERSONAL INFORMATION BE DISCLOSED TO OVERSEAS RECIPIENTS?

BNR Partners store, process and backup your personal information on servers that are located locally in Australia (including through third-party service providers).

In some circumstances, BNR Partners may use third party service providers with operations located overseas, to carry out its functions and provide relevant services (which may include software providers and technology platforms).

Where we do disclose your personal information to an overseas recipient, we will take reasonable steps to ensure that your information is handled and stored in accordance with the Australian Privacy Principles (APPs). This may include entering into contractual arrangements with the recipient or ensuring they are already subject to laws that are equivalent to the Australian Privacy Principles that you can enforce.

## 8. HOW DOES BNR PARTNERS ENSURE THE SECURITY OF YOUR PERSONAL INFORMATION?

We take reasonable steps and implement appropriate technical and organisational measures to ensure that personal information held by us is protected from misuse, interference or loss, unauthorised access, modification or unauthorised disclosure.

BNR Partners holds personal information predominantly in electronic form in secure systems. Some limited information is also retained in hard copy format held in secured premises. Our security procedures for both hardcopy and digital information are periodically reviewed and updated where required.

Disclosure of your personal information to third parties is always made on a confidential basis and subject to an appropriate contract.

Our staff receive regular data privacy and information security training including on the secure handling of personal information including government related identifiers, TFNs and ID verification information.

We take reasonable steps to de-identify or destroy the personal information we hold about you where it is no longer required for the purpose for which we collected it (except where we are required or authorised by law to retain that information).

We may retain identity verification records, customer due diligence records, beneficial ownership or control information and other compliance records for the periods required or authorised by applicable laws and regulatory requirements.

While we take reasonable steps to ensure information security, the transmission of information over the Internet is never completely secure, malicious actors constantly improve their attack vectors and human error cannot be completely ruled out.

## 9. YOUR DATA PRIVACY RIGHTS

Subject to certain conditions, exemptions and verification of your identity, as appropriate, you have the following data privacy rights in respect of your personal information:

- Right to information as provided by us in this Privacy Policy.
- Right to remain anonymous, where practicable.
- Right to withdraw consent at any time where our data handling is based on your consent.
- Right to access your personal information held by us.
- Right to correction of your personal information held by us if it is incorrect or incomplete. We will take reasonable steps in the circumstances to ensure your personal information is accurate, up-to-date, complete, relevant and not misleading in the context of each relevant purpose. However, we also rely on your timely update of your information by contacting us.
- Right to opt out from our marketing by using the unsubscribe facility in our communications or by contacting us.
- Right to know the source of your marketing data.
- Right to remove your TFN if you provided it for a purpose not connected with the operation of a taxation law, personal assistance law or superannuation law.
- Right to information about the Official Record Verification hub which can be obtained at [www.idmatch.gov.au](http://www.idmatch.gov.au).
- Right to complain about our third party identity verification service provider's use of Official Record Verification, where applicable.
- Right to complain to us or the relevant authority, such as, the Office of the Australian Information Commissioner, if you remain dissatisfied with how we have handled your enquiry or complaint.

We will respond within a reasonable time, typically, within 30 days or sooner, as required by law, following your request. If we need more time, we will let you know why and when you can expect our response.

We may refuse requests on certain grounds, for example, if they are unreasonably repetitive, disproportionately demanding, impracticable or otherwise exempt. If we refuse your request, we will explain our lawful reason for doing so.

We may charge a fee or recover from you our reasonable costs as prescribed or permitted by the law to handle your requests. However, in most circumstances, we will handle your request free of charge.

You can disable cookies and similar technologies through your internet browser. Alternatively, you could prevent some tracking by:

- turning off the automatic download feature in your browser to avoid tracking by pixels;
- applying your browser's do not track (DNT) feature, allowing you to opt out of all tracking, where DNT signals are recognised by our online property or our advertising partners;
- opting out from online interest-based advertising from companies that participate in public opt-out programs;
- enabling privacy controls on your browser to automatically send opt-out signals to sites indicating that you do not wish to share your data for targeted advertising; or
- opting out from Google Analytics or downloading the opt-out add-on and other third party services that deploy cookies and similar technologies.

Please be aware that if you opt-out of certain trackers, some or all of the functionality of our online services may be reduced. If you clear cookies in the browser on your device, the next time you visit our online services, cookies and similar technologies will be deployed again. However, you can prevent this by permanently blocking them in your browser.

## 10. AUTOMATED DECISION-MAKING AND USE OF AI TOOLS

We may use automation and approved artificial intelligence (AI) tools in limited ways to assist with certain decisions and processes in connection with the purposes described in this Privacy Policy. For example, automation and AI tools may be used to:

- support internal analysis, research, drafting, summarising and quality assurance of documents stored in our systems;
- prioritise or route queries and communications, including using rules or automated workflows;
- identify patterns or trends in service usage, feedback or internal data; and

- assist with risk-based assessments and other checks required by law or professional standards, subject to human review and oversight.

We do not make decisions that have legal, financial or similarly significant effects on you solely on the basis of automated decision-making without appropriate human involvement.

Where automation or AI tools are used in connection with a decision about you, our staff remain responsible for the services we provide and will exercise professional judgment, human oversight and appropriate quality control procedures over any material outputs.

Our use of automation and AI tools is limited to approved work environments (for example, firm-managed Microsoft 365 applications and enterprise Microsoft 365 Copilot in our work environment) and is subject to the same confidentiality, access control and information security measures that apply to our other systems and content.

## 11. HOW DO YOU CONTACT THE PRIVACY OFFICER AT BNR PARTNERS?

Any queries regarding your personal information which is held by BNR Partners should be addressed to the firm's privacy officer whose contact details are set out below.

**Privacy Officer** BNR Partners PO Box 1337

Waverley Gardens Vic 3170

T: (03) 9781 6800

## 12. WHAT IF THE PRIVACY POLICY CHANGES?

BNR Partners may vary this Privacy Policy from time to time so we encourage you to review this Privacy Policy at regular intervals.

We will publish any updated version of our Privacy Policy on the BNR Partners website.

Last updated: 7 September 2026