



# DATA COLLECTION & PRIVACY POLICY

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2015

## DATA COLLECTION AND PRIVACY POLICY

### Purpose:

Coleman Farrell needs to gather and use certain information about individuals. This policy describes how this personal information is collected, handled and stored to meet our data protection standards and to comply with the law.

This policy exists to ensure that Coleman Farrell;

- Complies with data protection laws and follows good practice
- Protects the rights of its clients, customers, staff and suppliers
- Is transparent in the way we collect, store, process and use individuals and or company data
- Protects itself from the risks of any breaches to this policy and the relevant laws

### Associated Documents & Reference:

- Privacy Act 1988
- Privacy Amendment act 2000 (Private Sector ) (C'th)
- Privacy Act Fact Sheet # 17 Privacy Principals
- Australia Privacy Principals (APP)

### Overview:

Coleman Farrell recognises that while free flow of information is important it must ensure that data collected, processed and stored must be balanced against the privacy interests of individuals and business. This policy applies to all personal information that Coleman Farrell collects and holds about individuals ("you") and business operations with regards to financial information.

### Responsibility:

This policy applies to all data that the company holds relating to identifiable individuals, even if that information technically falls outside of the governing legislation. Information collected can include:

- ✓ Names of individuals
- ✓ Address and other forms of contact information such as email and telephone details.
- ✓ Information relating to individual and company tax returns
- ✓ Financial information of individuals and businesses.

All employees of Coleman Farrell will ensure that all client data is collected and stored in line with this policy. Client data is to be treated as confidential and will not be exposed to other third party providers without prior consent from the individual or business representative.

## General Data Collection:

Coleman Farrell will take reasonable steps to ensure that data collected and stored is accurate and up to date. As part of this process we may contact you to verify contact details or other information deemed necessary in conducting our business.

It is the responsibility of all Coleman Farrell employees to ensure that the following principals are maintained;

1. Data collected will be held in as few places as necessary. This may include our database (*Soft Copy*) or client file (*Hard Copy*)
2. Client data shall be updated on an annual basis or as deemed necessary
3. When working with sensitive\confidential data employees will ensure that monitors are not left on and in view of the public. Monitor Screens will be locked when left unattended
4. Personal data will not be shared informally or sent in an unsecured manner.
5. Information shall not be discussed outside of the parameters for which it has been collected.
6. Any data printouts that are not be filed will be shredded and disposed of.

## Web Site Data Collection:

Visitors to the Coleman Farrell web site are not requested to reveal any individually identifiable information. We may collect some information about visitors indirectly through standard web logs, including IP address, what browser is being used and the domain name from which a visitor entered the site.

Coleman Farrell may use this information to administer and improve our web site however this information is collective and not listed individually. In some cases data may be traceable to an individual, but we do not normally seek to identify individuals unless we believe that our site may be unsuitably used.

Through our web site, we offer users the opportunity to receive information on our service offering and subscribe to our news letters.

At times visitors who wish to receive information about our service offerings or request for us to make contact with them may be required to provide contact information such as;

- Names
- Mailing Address
- Email Addresses
- Telephone contact numbers.
- For some visitors who are seeking financial advice they may be required to provide some financial information which will be used in the course of providing a business service.

## Data Storage & Security:

Coleman Farrell will use and disclose information it holds about an individual for the purpose for which it was collected and for other related purposes for which the individual would reasonably expect us to use the information or to which the individual has agreed (either expressly or implied).

In many cases the primary purpose of collecting the information is to include it in one or more of our databases so that we can conduct the service offering on your behalf or provide it to our third party partners such as government bodies and agencies where necessary.

At times we may be required to provide information about individuals or companies by law and may do so without the consent of the individual.

Financial information will not be provided to creditors without your prior written consent.

Coleman Farrell do not on-sell or release any of your information to persons or businesses to which your information can be used for marketing purposes outside of our own governance.

### Information Retention:

Coleman Farrell will take all reasonable measures to ensure that we will destroy or remove all identifying features from information held about an individual or business within a reasonable time after it is no longer needed.

All hard copy (paper) information shall be shredded using a cross cut shredding machine or where necessary a third party provider of document destruction.

All soft copy (electronic) information and or files shall be removed completely from all databases or hard drives where no longer applicable or required to be kept by law.

General Retention Period for Financial documents:

Record	Retention Period
Financial Records (E.g. Invoices, Cheques, financial statements)	7 years after the end of the transaction to which the document relates – not 7 years from when the document was created.
Records electronically lodged with ASIC or any ASIC form	7 years
Financial transaction Reports (FTR Act 1988)	7 Years after the day in which the relevant account is closed
Income Tax Assessment	5 years after the records were prepared or obtained or 5 years following completion of the transaction.
Capital Gains Tax requirements	5 years after the completion of the transaction
GST Requirements	At least 5 years after the completion of the transaction
FBT Assessments	5 years from the date they were prepared, obtained or the transaction was completed.
State Taxes (payroll, land and stamp duty)	5 years
Employment Records	7 years after employment terminated

### Correction of data held:

Coleman Farrell will correct information it has about an individual or business where necessary as it is discovered or if the individual or business is able to show, the information is incorrect.

We will act promptly to rectify the error or any misleading information. This may include contacting third party partners such as the ATO, ASIC or other agency where necessary.

## Request to Access Information:

Individuals and business owners who are subject to personal and or financial data collected by Coleman Farrell are entitled to:

- Ask what information we hold about them and why,
- Ask how to gain access to it,
- Be informed how to keep it up to date
- Ask how we are meeting its data protection obligations.

If an individual or business owner contacts Coleman Farrell requesting this information it should be made in writing, email is accepted. Where a change of information is submitted to ASIC a fee may be charged.

You may be requested to provide proof of identity where necessary.

Individuals and businesses who would like more information regarding our data collection and privacy policy are encouraged to contact the Business Manager on 02 4344 7114 or email [tricia@colemanfarrell.com.au](mailto:tricia@colemanfarrell.com.au).

## Records/Review:

This Policy shall be reviewed for continuing suitability during Management Reviews, safety consultation meetings/agendas and or updates to any related Act, Standard or regulation. At minimum documents shall be reviewed on an annual basis

## Authorisation:

Policy Approved By: Patricia Downs  
Position: Business Manager

Signature:  
Date:



13/07/2015