

Privacy Policy

John Baraiolo & Co is committed to your privacy. We understand the importance you attach to information that identifies you, your 'personal information' and we want to help you protect it. Therefore we have created the below privacy policy ("Privacy Policy").

We are committed to ensuring the privacy and security of your personal information. As an Authorised Representative of Count Financial Limited and as a Credit Representative of Finconnect (Australia) Pty Ltd, members of the Commonwealth Bank Group of companies, we are bound by the Group's Privacy Policy. For further details, you can refer to the [Group's Privacy Policy](#)

We also maintain an internal privacy policy, engagement letters and standard terms and conditions governing the delivery of professional services which also describe how we manage personal, sensitive and special categories of information.

John Baraiolo & Co has created this privacy policy ("Privacy Policy") in order to demonstrate its firm commitment to privacy.

- This Privacy Policy applies to personal information collected by John Baraiolo & Co.
- John Baraiolo & Co is bound by the Privacy Act and the Australian Privacy Principles (APPs) set out in the act.
- John Baraiolo & Co will update this Privacy Policy as required. If it is changed, the changes will be posted on the John Baraiolo & Co website so that you are always aware of the sort of information collected, how the information may be used, and under what circumstances it may be disclosed by John Baraiolo & Co.
- Please note that if at any time John Baraiolo & Co is required by law to release information about you or your organisation, John Baraiolo & Co must cooperate fully.
- This Privacy Policy **does not** apply to acts or practices of John Baraiolo & Co that are directly related to employee records of current or former employees.

What sort of information does John Baraiolo & Co collect and hold?

John Baraiolo & Co collects information when you engage the organisation so that we may provide you with, (but is not limited to) financial planning, tax, audit, lending and other primary purpose services.

The type of information we may collect from you includes (but is not limited to):

- names, address, email, phone numbers and job titles;
- information in documents such as passport or driver's licence;
- tax file numbers (TFNs) and other identification numbers such as Medicare number;
- date of birth and gender;
- financial information;
- details of superannuation and insurance arrangements;
- sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties;
- bank account details, shareholdings and details of investments;
- educational qualifications, employment history and salary.

Lending services are authorised through Finconnect (Australia) Pty. Ltd. ABN 45 122 896 477 Australian Credit Licence No. 385888 a wholly owned subsidiary of Count Financial Ltd. **LINK TO FINCONNECT PRIVACY POLICY – [CLICK HERE](#).**

Why and how does John Baraiolo & Co collect the information and how is it used?

We will only collect personal information which you have voluntarily provided to us, or consented to us collecting the information. We may collect personal information about you in a variety of ways, for example:

- when you visit or use our website;
- when you retain our services;
- when you subscribe to our newsletter or mailing list;
- when you contact us or our associated entities, for example by mail, email or telephone;
- when you apply for employment with us.

How do we use your personal information?

John Baraiolo & Co and our associated entities will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as accounting, financial planning, lending or business advisory services.

John Baraiolo & Co may also use the information we collect for our internal business and management processes (for example, accounting or auditing purposes), monitoring and improving our website, keeping you informed about our services and company news, and for any other purposes that would be reasonably expected by you and to allow us to comply with our obligations under the law.

John Baraiolo & Co also uses the information you provide to send you information (either by email or post) that you request. If at any time you receive material that you did not request or do not want to receive such material any more, you can unsubscribe by contacting us as detailed below:

- By email admin@jbco.net.au or by mail at PO Box 3217, NORWOOD SA 5067
- Through our contact details set out in the ‘**Contact Us**’ section of our website and informing us that you wish to unsubscribe.

Direct Marketing

John Baraiolo & Co may also use your personal information for the purposes of marketing our services.

If you do not want to receive marketing material from us, you can unsubscribe by contacting us as detailed below:

- By email admin@jbco.net.au or by mail at PO Box 3217, NORWOOD SA 5067
- Through our contact details set out in the ‘**Contact Us**’ section of our website and informing us that you wish to unsubscribe.

What happens if you do not provide the information?

We require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

To whom does John Baraiolo & Co disclose your personal information?

John Baraiolo & Co will not sell, rent, trade or otherwise supply to third parties any personal information obtained from you unless you consent.

Your personal information will only be disclosed to those employees or consultants of John Baraiolo & Co and its associated entities related to the agreed provision of services. Depending on the nature of the engagement, we may need to disclose your personal information to third parties which may include service and content providers (for example accounting, financial planning, lending or auditing service providers or our website hosting service providers), dealers and agents, or our contractors and advisers.

Cross border disclosure

We may store, process or back-up your personal information on servers that are located overseas (including through third party service providers). These servers are commonly located in the United States and Singapore at present and apply to users of Xero and MYOB.

The privacy laws in other countries might not be the same as in Australia. However, where we do provide your personal information to third parties overseas, John Baraiolo & Co will take such steps as are reasonable to ensure that your information is handled and stored in accordance with our privacy laws and the Privacy Policy.

Important notice

In the event that the processing or use of your personal information involves the disclosure of any information outside Australia, you acknowledge that by providing us with your personal information, you consent to such overseas disclosure. By consenting to such disclosure, you acknowledge and accept that:

- A. John Baraiolo & Co will not be accountable under the *Privacy Act 1988* for any breach of your privacy by the overseas recipient; and
- B. You will not be able to seek redress under the *Privacy Act 1988* for any breach of your privacy by the overseas recipient.

John Baraiolo & Co and its associated entities shall not knowingly provide personal information to any third party for any other purpose without your prior consent unless ordered to do so by a law enforcement body, court of law or other governmental or regulatory body or agency.

How will John Baraiolo & Co keep your personal information secure?

John Baraiolo & Co has security measures designed to protect against the loss, misuse and/or alteration of the information under its control.

Our security procedures

John Baraiolo & Co takes your privacy and the privacy of its associated entities and their clients very seriously. We will take reasonable steps in the circumstances to protect any personal information you provide to us from misuse, interference or loss and unauthorised access, modification and disclosure. We will also de-identify and destroy the personal information we hold about you once our legal obligations cease. Our security procedures are reviewed from time to time and we update them when relevant.

However, please be aware that the transmission of data over the Internet is never guaranteed to be completely secure. It is possible that third parties not under the control of John Baraiolo & Co may be able to access or intercept transmissions or private communications without John Baraiolo & Co's permission or knowledge.

John Baraiolo & Co takes all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

John Baraiolo & Co typically use the below security measures;

- Restricted access
- Firewalls
- All key on site security measures
- Employee contract agreements inclusive of confidentiality clauses

Identifiers

We will not adopt as our own, any government identifiers you may provide to us such as TFNs etc.

Accuracy and correction

To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an email to admin@jbco.net.au (no spam please) or writing to us at PO Box 3217, Norwood SA, 5067.

Access to your personal information

You can request us to provide you with access to personal information we hold about you by sending us an email to admin@jbco.net.au (no spam please) or writing to us at PO Box 3217, Norwood SA, 5067. We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will not apply to lodging a request for access.

Your request to access your personal information will be dealt with in a reasonable time. Note that we need not provide access to personal information if a request is frivolous, or where to provide access would pose a threat to health or public safety, unreasonable interference with another person's privacy, or be a breach of the law. If we refuse access, we will provide you with reasons for doing so.

Links to other websites

John Baraiolo & Co and our associated entities' websites may provide links to other sites for you to access. You should be aware that these other sites are not subject to this Privacy Policy or our privacy standards and procedures. You will need to contact them directly to ascertain their privacy standards.

Collecting data

The John Baraiolo & Co website may deposit "cookies" in a visitor's computer. Cookies are pieces of information that a website transfers to an individual's hard drive for record keeping purposes. Cookies are only sent back to the website that deposited them when a visitor returns to that site. Cookies make it easier for you by saving your preferences while you are at our site. We never save personal identifiable information in cookies.

Most web browsers are initially set up to accept cookies. You can, however, reset your browser to refuse all cookies or to indicate when a cookie is being sent.

Changes to our Privacy Policy

This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will publish any changes on this website. By continuing to use our website and continuing to provide us with your information, you confirm your acceptance of these changes. This Privacy Policy was last amended in January, 2016.

We encourage you to check our website regularly for any updates to our Privacy Policy.

Complaints resolution

John Baraiolo & Co is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way we have handled your privacy, please send an email to admin@jbco.net.au or write to John Baraiolo & Co at PO Box 3217, Norwood SA, 5067. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe.

However, if after receiving your response, you still consider that your privacy complaint has not been resolved, you may refer your concerns to the Office of the Australian Information Commissioner at www.oaic.gov.au.

BY USING THIS WEBSITE, YOU SIGNIFY YOUR UNDERSTANDING AND AGREEMENT TO COMPLY WITH ALL TERMS AND CONDITIONS AND CONFIRM YOUR ACCEPTANCE OF THE TERMS OF THIS PRIVACY POLICY AND CONSENT TO THE USE OF YOUR PERSONAL INFORMATION AS SET OUT IN THIS PRIVACY POLICY.

If you do not agree with the terms of this Privacy Policy, please do not use the website or otherwise provide us with your personal information.