Privacy Policy

This privacy policy applies to Bell Partners Accountants Advisors Auditors Pty Ltd ACN 123 069 590 (**BPAAA**) and all entities owned or controlled by BPAAA (each called a **Related Entity**) in relation to BPAAA's or its Related Entity's (**BPAAA** or **we**) operations. This policy explains how we handle personal information and complies with the requirements of the Australian Privacy Act 1988 (Cth) (**Privacy Act**). If you have any further questions in relation to this policy, please contact our Privacy Officer at pnicolaou@bellpartners.com.

Collection of personal information by us

We collect and hold personal information from clients, employees, contractors and other individuals. We collect and hold this information when it is necessary for our business purposes.

The primary types of personal information we collect and hold relate to the contact details of our clients, suppliers and other business contacts. This information includes names, addresses, telephone numbers and e-mail addresses. In the course of providing professional services to our clients, we may collect and hold more detailed personal and financial information (for instance financial details if we are engaged to perform financial services, or credit information).

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

Because of the nature of our business, we do not deal with people 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 reasons for which we collect, hold and use personal information are:

- to provide our services;
- to respond to a person's request;
- to maintain contact with our clients;
- to keep clients and other contacts informed of the services we offer and industry developments that may be of interest to them, and to notify them of services we offer, seminars and other educational events we host or conduct;
- for general management and reporting purposes, such as invoicing;
- for recruitment purposes;

- for purposes related to the employment of our personnel and providing internal services to our staff; and
- other purposes related to our business.

If you choose not to provide us with personal information, we may be unable to provide the services we offer.

We may collect, hold and use personal information about people to market our firm, including by email. However, individuals always have the opportunity to elect not to receive further marketing information from us by emailing our privacy officer at pnicolaou@bellpartners.com. Please allow between 21 and 28 days for your request to be processed. Alternatively, if we have contacted you by email, you may use the "unsubscribe" function in that email to notify us that you no longer wish to receive marketing information from us by email.

If we collect, hold or use personal information in ways other than as stated in this policy, we will ensure we do so strictly in accordance with the requirements of the Privacy Act.

Employee records are not generally subject to the Privacy Act and therefore this policy may not apply to the handling of information about our employees.

Decisions made by computer programs

We use some computer programs, including software and artificial intelligence (AI) tools, that use personal information to make, or substantially assist our staff in making, decisions that could significantly affect individuals. These are described below.

Client identity verification and risk assessment

When we take on a new client, and during our engagement, we use software to verify identity, check names against politically exposed person and sanctions lists, and assess the money laundering and terrorism financing risk of a client or engagement, as required by anti-money laundering and counter-terrorism financing laws.

Kinds of personal information used: names, dates of birth, addresses, identity document details, nationality, occupation, information about the source of funds or wealth, details of related entities and beneficial owners, and the results of public register and screening checks.

Kinds of decisions: the results from this software substantially assist our staff in deciding whether a person's identity has been verified, the risk rating and level of due diligence that applies to a client or engagement, and whether we can accept or continue an engagement.

AI tools used in client work

Our staff use AI tools, including generative AI, to help analyse information, review documents and prepare work for our clients.

Kinds of personal information used: information in the documents and data provided to us by clients or their representatives, including financial, tax, income, asset and business information, and details of related entities and individuals.

Kinds of decisions: these tools may substantially assist our staff in preparing tax returns and other lodgements, and in forming the advice and recommendations we give to clients about their financial, tax and business affairs.

All outputs from these computer programs are reviewed by our staff, and we do not use computer programs to make these decisions without the involvement of a member of our team. If you have any questions about how we use computer programs in decision-making, please contact our Privacy Officer.

Disclosure of personal information

We do not routinely disclose personal information to other organisations unless:

- the use or disclosure is expressly permitted by this policy;
- we believe it is necessary to provide you with a service which you have requested;
- to protect the rights, property or personal safety of any member of the public or a client of BPAAA;
- some or all of the assets or operations of BPAAA are or may be transferred to another party as part of the sale of some or all of BPAAA's business;
- you provide your consent; or
- such disclosure is otherwise required by a court, government body or permitted by law, regulation, rule or professional standard.

We may also share non-personal, de-identified and aggregated information for research or promotional purposes. Except as set out in this policy, we do not sell to or trade personal information with third parties.

We use a range of service providers to help us maximise the quality and efficiency of our services and our business operations (including internal business requirements). This means that individuals and organisations outside of BPAAA will sometimes have access to personal information held by us and may collect or use it from or on our behalf. This may include, (without limitation), independent contractors, consultants, security storage providers, information technology providers, identity verification providers, AI tool providers, credit managers and debt collecting agencies. We require our contractors to adhere to our privacy guidelines and not to keep, use or disclose personal information we provide to them for any unauthorised purposes.

If our staff obtain products or services offered by a third party pursuant to an agreement or arrangement between that third party and us (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 services.

Privacy on Our Web Site

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

In order to properly manage our website, 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 any individual and it is used solely to ensure that our website and applications provide the best possible navigational experience for users.

Cookies and web beacons are used on our 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 do not consent to the use of cookies, you can control them through your browser, including removing them 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 website.

A web beacon is a clear picture file used to keep track of your navigation through a website. Along with cookies, web beacons help us obtain an understanding of how users of our website navigate through and process the content contained in it. On occasion, BPAAA may advertise on third party websites. As part of the tracking process for advertising campaigns we may at times use web beacons to count visitors who have come to the website after being exposed to our advertising on a third party site. We do not use this technology to access your personal information.

Because BPAAA wants your user experience to be as informative and resourceful as possible, we may provide a number of links to website and embedded content operated by third parties that may also set cookies and web beacons. We are not responsible for the privacy practices or policies of those sites and 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-BPAAA website is 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

Depending on the purpose for which we have collected personal information (for example, registration for a BPAAA event or a request for particular information or material), we may store some of the information electronically in our client relationship management system. Some or

all of this personal information may be available to partners and authorised staff of BPAAA but only for use in accordance with this policy.

We 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 to respect the confidentiality of any personal information held by BPAAA.

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 breach another person's privacy rights).

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.

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 our Privacy Officer and we will try to resolve those concerns.

If you wish to have your personal information deleted, please let us know and we will take reasonable steps to delete it (unless we need to keep it for legal or internal risk management reasons, or compliance with our professional obligations).

If BPAAA becomes aware of any ongoing concerns or problems concerning our privacy practices, we will 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

We may update this privacy policy at any time by publishing an updated version on this website. The amended policy will apply between us, whether or not we have given you specific notice of any change.

This policy was last updated on 26 November 2026.