

PRIVACY POLICY

This document relates to your personal information, collected by Work@Scale as part of the Subscriber sign up process and your use of Work@Scale services, and held by Work@Scale as part of our day-to-day business dealings with you. Some of the personal information that Work@Scale holds may be the same information as that which you enter in your Work@Scale financial database, however our information is not collected only from that source. Only you and your nominated representatives (which explicitly includes Work@Scale employees) have access to your financial database under normal operational circumstances with the exception of summarised (anonymous) industry wide benchmarking information for use in our research department (which will not have enough detail to identify underlying individuals or individual businesses under any circumstances) and associated research subscribers.

This Privacy Policy sets out the approach which the Work@Scale will take in relation to the treatment of Personal Information. It includes information on how Work@Scale collects, uses, discloses and keeps secure, individuals' personal information. It also covers how Work@Scale makes the personal information it holds available for access to and correction by the individual.

This policy has been drafted having regard to Work@Scale's obligations under the Privacy Act 1988 (including the National Privacy Principles) (the Privacy Act).

This policy is a public document and has been prepared in light of National Privacy Principle 5, Openness.

1. Collection

Biarri ("we", "our") provides services and products in the accounting and information technology industries. Part of this service provision requires us to protect your privacy. From 21 December 2001 the Commonwealth Privacy Act contains new sections that we are bound by. They concern a number of principles in relation to the protection of your personal information and in how we must deal with our customers in relation to this information. Personal information held by Work@Scale may include your name, current and previous addresses, telephone/mobile numbers, e-mail address, bank account and credit card details, details of your services and information we require to perform our services for you.

Sensitive personal financial information entered into Work@Scale's online accounting and wealth management products, will not be used or disclosed by Work@Scale except as authorised by you to perform our services for you and to provide summarised anonymous benchmarking data across all our clients. Access to this information by your professional advisors or other representatives can only be granted by you. Should you choose not to provide personal information we may not

be able to provide you with the services you require or at a sufficient level that we regard as important for performing at best practice and as such we reserve the right to terminate the supply of this service to you.

1.1 Work@Scale will only collect Personal Information where the information is necessary for Work@Scale to perform one or more of its functions or activities. In this context, “collect” means gather, acquire or obtain by any means, information in circumstances where the individual is identifiable or identified.

1.2 Work@Scale collects Personal Information primarily to supply individuals who obtain Work@Scale products and services directly from Work@Scale with information and details of its products and services. Work@Scale also collects and uses Personal Information for secondary purposes including:

provision of products and services;

accounting purposes;

business planning and product development.

1.3 Work@Scale will notify individuals (including, but not limited to, our customers) of the matters listed below at the time of collecting any Personal Information:

the main reason that we are collecting Personal Information (this reason will be the Primary Purpose);

other related Uses or Disclosures that we may make of the Personal Information (Secondary Purposes);

our identity and how individuals can contact us, if this is not obvious;

that individuals can access the Personal Information that Work@Scale holds about them;

that individuals should contact Work@Scale if they wish to access or correct Personal Information collected by us or have any concerns in relation to Personal Information;

the organisations or types of organisations to whom we usually Disclose the Personal Information;

where applicable, any law that requires the Personal Information to be collected;

the consequences (if any) for the individual if all or part of the Personal Information is not provided to Work@Scale.

1.4 Where it is not practicable for Work@Scale to notify individuals of all of the Collection Information before the collection of Personal Information, Work@Scale will ensure that individuals are notified of the Collection Information as soon as possible after the collection. Work@Scale will provide “post collection

notification” in those circumstances where it is not practicable to notify individuals about the collection of their personal information before it is collected.

1.5 Work@Scale will not collect Sensitive Information from individuals except with express consent from the individual and only where it is necessary for Work@Scale to collect such information for an activity or function.

1.6 Work@Scale will not collect Personal Information secretly or in an underhanded way.

1.7 Work@Scale will take steps to ensure that individuals on purchased lists are or have been notified of the information as outlined at 1.3.

2. Use

2.1 Work@Scale will obtain an individual’s consent for Use of non-sensitive Personal Information for Secondary Purposes at the time of collection, unless the Use is a related Secondary Purpose which would be within the relevant individual’s Reasonable Expectations.

2.2 Work@Scale Uses Personal Information primarily for the purposes listed in 1.2 above.

2.3 If Work@Scale relies on the Direct Marketing exception to Direct Market to individuals it will ensure that:

individuals are clearly notified of their right to Opt Out from further Direct Marketing; and

if the individual Opts Out of all Direct Marketing the Opt Out will be respected by and Work@Scale implemented free of charge.

2.4 Work@Scale will not use Sensitive Information for Direct Marketing.

2.5 Work@Scale may use Personal Information to avoid an imminent threat to a person’s life or to public safety. It may also use Personal Information for reasons related to law enforcement or internal investigations into unlawful activities.

2.6 Work@Scale will not use Personal Information without taking reasonable steps to ensure that the information is accurate, complete and up to date.

2.7 Work@Scale will not attempt to match de-identified or anonymous data collected through surveys or such online devices as “cookies”, with information identifying an individual, without the consent of the relevant individual.

3. Disclosure

3.1 Work@Scale may Disclose Personal Information to related or unrelated third parties if consent has been obtained from the individual.

3.2 Work@Scale may Disclose Personal Information to unrelated third parties to enable outsourcing of functions where that Disclosure or Use is for a related Secondary Purpose and has been notified to individuals or where such Disclosure is within the individual's Reasonable Expectations.

3.3 Work@Scale will take reasonable steps to ensure that its contracts with third parties include requirements for third parties to comply with the Use and Disclosure requirements of the Privacy Act.

3.4 In the rare event that Work@Scale is required to disclose Personal Information to law enforcement agencies, government agencies or external advisors Work@Scale will only do so in accordance with the Privacy Act or any other relevant Australian legislation.

3.5 Work@Scale may Disclose Personal Information to avoid an imminent threat to a person's life or to public safety.

3.6 If a Disclosure is not for a Primary Purpose; is not for a related Secondary Purpose; or upfront consent has not been obtained, Work@Scale will not Disclose Personal Information otherwise than in accordance with the exceptions set out at 3.1 to 3.6 above.

3.7 Work@Scale does not generally share its customer lists on a commercial basis with third parties but if it did, it would only do so if we had the appropriate consent of the individual involved.

4. Remarketing

4.1 Work@Scale also uses 3rd party vendor re-marketing tracking cookies, including the Google Adwords tracking cookie. This means we will continue to show ads to you across the internet, specifically on the Google Content Network (GCN). As always we respect your privacy and are not collecting any identifiable information through the use of Google's or any other 3rd party remarketing system.

4.2 The third-party vendors, including Google, whose services we use – will place cookies on web browsers in order to serve ads based on past visits to our website. – Third party vendors, including Google, use cookies to serve ads based on a user's prior visits to your website. This allows us to make special offers and continue to market our services to those who have shown interest in our service.

5. Information Quality

5.1 Work@Scale will review, on a regular and ongoing basis, its collection and storage practices to ascertain how improvements to accuracy can be achieved.

5.2 Work@Scale will take steps to destroy or de-identify Personal Information after as short a time as possible and after a maximum of seven years, unless the law requires otherwise.

6. Information Security

6.1 Work@Scale requires employees and contractors to perform their duties in a manner that is consistent with Work@Scale's legal responsibilities in relation to privacy.

6.2 Work@Scale will take all reasonable steps to ensure that paper and electronic records containing Personal Information are stored in facilities that are only accessible by people within Work@Scale who have a genuine “need to know” as well as “right to know”.

6.3 Work@Scale will review, on a regular and ongoing basis, its information security practices to ascertain how ongoing responsibilities can be achieved and maintained.

7. Access and Correction

7.1 Work@Scale will allow its records containing Personal Information to be accessed by the individual concerned in accordance with the Privacy Act.

7.2 Work@Scale will correct its records containing Personal Information as soon as practically possible, at the request of the individual concerned in accordance with the Privacy Act.

7.3 Individuals wishing to lodge a request to access and/or correct their Personal Information should do so by contacting Work@Scale, as per the details on the back of this document.

7.4 Work@Scale will not normally charge a fee for processing an access request unless the request is complex or is resource intensive.

8. Openness

8.1 Contact with Work@Scale via phone or web inquiry will be the first point of contact for inquiries about privacy issues.

8.2 Any formal privacy related complaints should be directed in writing to the Work@Scale Privacy Officer

180 Albert St. Melbourne, VIC 3181, Australia

8.3 Work@Scale will endeavour to manage any privacy related complaint efficiently and in a timely manner.

8.4 Work@Scale websites will contain a prominently displayed privacy statement and will include a copy of this Work@Scale Privacy Policy.

9. Anonymous Transactions

9.1 Work@Scale will not make it mandatory for visitors to its web sites to provide Personal Information unless such Personal Information is required to answer an inquiry or provide a service. Work@Scale may however request visitors to provide Personal Information voluntarily to Work@Scale (for example, as part of a competition or questionnaire).

9.2 Work@Scale will allow its customers to transact with it anonymously wherever that is reasonable and practicable.

10. Transferring personal information overseas

10.1 Work@Scale generally does not send information overseas.

10.2 If Personal Information must be sent by Work@Scale overseas for sound business reasons, Work@Scale will require the overseas organisation receiving the information to provide a binding undertaking that it will handle that information in accordance with the National Privacy Principles, preferably as part of the services contract.

11. Glossary

Collection Information means the information outlined in 1.3 notified to individuals prior to, or as soon as practical after, the collection of their Personal Information.

Direct Marketing means the marketing of goods or services through means of communication including written, verbal or electronic means. The goods or services which are marketed may be those of Work@Scale or a Related Body Corporate or those of an independent third party organisation.

Disclosure generally means the release of information outside Work@Scale, including under a contract to carry out an “outsourced function”.

Health Information means:

information or an opinion about:

the health or a disability (at any time) of an individual; or

an individual's expressed wishes about the future provision of health services to him or her; or
a health service provided or to be provided to an individual; that is also personal information; or
other personal information collected to provide or in providing a health service; or
other personal information about an individual collected in connection with the donation; or intended
donation by the individual of his or her body parts or body substances. Opt Out means an individual's
expressed request not to receive further Direct Marketing.

Personal Information means information or an opinion (including information or an opinion forming
part of a database), whether true or not and whether recorded in a material form or not, about an
individual whose identity is apparent, or can reasonably be ascertained from the information or opinion.

Primary Purpose is the dominant or fundamental reason for information being collected in a particular
transaction.

Reasonable Expectation means a reasonable individual's expectation that their personal information
might be Used or Disclosed for the particular purpose.

Sensitive Information means:

information or an opinion about an Individual's:

racial or ethnic origin; or

membership of a political association; or

religious beliefs or affiliations; or

philosophical beliefs; or

membership of a professional or trade association; or

membership of a trade union; or

sexual preferences or practices; or

criminal record; that is also personal information; or

Health Information about an individual; or

Use means the handling of Personal Information within Work@Scale.

Contacting Work@Scale

If you require further information regarding Work@Scale's Privacy Policy, contact us.

Telephone: +61 (0)3 9510 3878

180 Albert St. VIC, 3181, Australia