



Financial Services Guide

Version number 24.02

1 March 2024

The purpose of this Financial Services Guide

This Financial Services Guide (FSG) has been authorised for distribution by the authorising licensee, Count Financial Limited ABN 19 001 974 625, Australian Financial Services (AFS) Licence no. 227232 ('Count').

Count is the AFS Licensee that authorises your Count financial adviser ('Adviser') and their firm ('we', 'us', 'our') to provide financial services.

This is an important document designed to provide you with information to make an informed decision about whether to use the financial services that we provide.

This FSG is divided into two parts and both parts must be read together. Part One of this FSG provides important information about Count and the financial services it is responsible for. Part Two of this FSG is an Adviser Profile and more specifically outlines the services, fees, and other important information applicable to us, as an authorised representative of Count.

Part One

Part One of this FSG provides information about:

- Count as the holder of the AFS License that authorises us to provide financial services;
- Relationships or associations with other entities;
- Other disclosure documents you may receive;
- The financial services and types of products we provide or recommend;
- Collecting your personal information and providing us with instructions;
- Fees or costs that may apply to you;
- Remuneration that Count, us, your Adviser, or a related entity may receive; and
- What you can do if you are not happy with our services or have a complaint.

Not Independent

Count and its authorised representatives maintain relationships with product issuers which prevents us from being classified as *independent, impartial, or unbiased* under s923A of the Corporations Act 2001.

Commission Payments

Count and its authorised representatives may receive regulated commissions from life insurance product issuers where financial services are provided in relation to these products.

For more information on commission payments, refer to section 4.

Count's Approved Product List (APL)

Authorised representatives of Count are generally restricted from recommending products that are not part of Count's APL.

Count utilises Lonsec Research as a primary research provider for the construction of Count's APL. Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406) (Lonsec Holdings). Lonsec Investment Solutions Pty Ltd (ABN 95 608) is also a subsidiary of Lonsec Holdings, and portfolios managed by this entity may appear on Count's APL.

Count has established a partnership program with a number of financial product issuers, through which it receives financial benefits. While these financial benefits are strictly governed for the purpose of funding education initiatives for Count's authorised representatives, participating product issuers may also have products included on Count's APL. For more information on Count's APL, refer to 'Approved Products', in section 3, below.

Contacting Count

If you need to contact us, you can speak with your Adviser. You can also contact Count using the following details:

Writing:	Count Financial Limited GPO Box 1453 Sydney NSW 2001
Phone:	1300 650 432
Email:	info@count.au

1. About Count

Count's purpose is to help Australians afford their dreams. Count educates clients and help them make informed decisions about their future. So, whether you are just starting out or approaching retirement, Count can assist you by providing you with a financial plan which gives you greater control over your financial future.

Count's relationship with Count Limited

Count is a subsidiary of Count Limited ABN 111 26 990 832 ("Count Limited"). Count Limited has subsidiaries and associates that provide accounting and financial advice services. Many of the Count Limited subsidiaries and associates that provide financial advice services do so as authorised representatives of Count.

Other relationships which might influence Count in providing financial advice services

Hub24 Limited

Count Limited is the owner of Count. HUB24 Limited is an ASX listed provider of investment administration platform and technology services and holds a material shareholding in Count Limited.

The Hub24 platform is available to us through an APL. We are obliged to always act in a client's best interests and will only recommend the use of the Hub24 platform if it is appropriate to do so. We also continue to use other platforms to implement our investment advice and you are free to request us to use an alternative platform if you would prefer. Importantly, we are not under any incentive, sales target, or obligation to recommend the Hub24 platform.

CARE Managed Accounts

DWA Managed Accounts Pty Ltd ('DWA') (AFSL 264125), a subsidiary of Count Limited, will receive fees for the provision of investment advice in their role as investment adviser to the CARE investment process (please contact your Adviser for more details of the CARE investment process). Any such fees will be outlined in the SoA, should it be applicable, and relate to the work done by DWA's Investment Committee in maintaining the CARE portfolios.

The CARE Portfolio Management fee is 0.297% (inclusive of GST) of funds invested as part of CARE. For example, if your account balance in the CARE Managed Account facility was \$100,000, the fee would be \$297 (inclusive of GST) for that year.

No part of this fee is paid to Count.

2. Disclosure documents

You may receive the following documents when your Adviser provides financial services to you.

Statement of Advice (SoA)

If your Adviser provides personal advice tailored to your circumstances and needs, you will receive a SoA. The information contained in the SoA will help you make an informed decision in relation to the advice provided. It also sets out the advice, the reasons for the advice and details about any remuneration payable.

Record of Advice (RoA)

In certain circumstances, if you were previously issued with a SoA, your Adviser may provide further advice without the need for another SoA. Where this is the case, you will be provided with a Record of Advice (RoA). Additionally, in certain circumstances where you are provided advice on a small investment balance you may be issued with a RoA. Your Adviser may provide you with a copy of the RoA, which will outline the advice, the reason for the advice, and details about any remuneration payable.

Product Disclosure Document (PDS)

You will receive a PDS if your Adviser recommends a financial product or offers to arrange the issue of a financial product at your request. The PDS contains information about a financial product's features, fees, benefits and risks.

3. Services and products we offer

Having access to a comprehensive range of products and services helps ensure your Adviser can provide a tailored financial solution just for you.

Advice services we provide

Count's AFS Licence authorises the provision of financial services related to the following classes of financial products:

- Basic deposit products
- Life insurance
- Government debentures, stocks and bonds
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation, and
- Standard margin lending

Approved products

Count's specialist product research team undertakes due diligence on product providers and also uses independent research providers to select a range of high-quality products which your Advisers may recommend.

While other products may also be suitable to your needs, your Adviser will generally only provide advice on products that are listed on the Count APL.

All products included on the Count APL must meet Count's rigorous selection criteria and approval process.

Depending on your objectives, financial situation and needs, your Adviser may need to recommend a financial product that is not on the Count APL. If this occurs, any product recommended by your Adviser must still meet Count's selection criteria and approval process. The specific financial services and types of products that your Adviser is authorised to provide are outlined in Part Two of this FSG.

Non-advised transactions

At times you may wish to make an investment transaction and do not need assistance from us with any decisions in relation to the product or transaction. In these cases, we can take your instructions and arrange for the transaction to be completed, without providing personal advice. If you wish to proceed without advice from us, we will ask you to confirm your instructions in writing and sign an acknowledgment form. Any assistance we provide to complete your transaction should not be taken as a recommendation or endorsement of the product or transaction.

Services Count is not responsible for

Count is only responsible for those financial services or products offered by your Adviser in their capacity as an authorised representative of Count. This does not include any other services your Adviser may provide in any other capacity, including as an accountant or tax agent, such as:

- Taxation advice and services, e.g., completing tax returns,
- Accounting and audit services,
- Self-Managed Super Fund compliance and administration services,
- Advice on specific credit products (excluding Margin Lending),
- Business or legal advisory services,
- Advice on unlisted or private companies and investments, private development funds, franchises, high yield debentures, direct property, property syndicates, solicitor's or other mortgage schemes, derivatives, general insurance or direct international share holdings, and
- Any other services not provided as an authorised representative of Count.

In all your interactions with your Adviser, it's essential to ensure that you understand who is accountable for the advice or services offered to you. If you need additional clarification, please feel free to contact your Adviser or Count.

In order to provide tax (financial) services to you an Adviser must be a Qualified Tax Relevant Provider (QTRP). Based on the information collected from you, your Adviser will consider the tax consequences that relate directly to the financial advice being provided, however, this financial advice will not include an assessment of your overall tax position. To determine how your Adviser's financial advice fits with your overall tax position, you should seek separate tax advice about liabilities, obligations or entitlements that arise, or could arise, under taxation law.

4. Remuneration that we or Count may receive

All advice fees, including non-advised fees, and commissions must be paid directly to Count as the licensee. Count may retain a percentage, and the remainder, that is attributable to the financial services we provide, is passed on to us.

If the fees, commissions or benefits cannot be determined at the commencement of our services, we will describe the manner by which they are calculated and provide you with an estimate of the applicable remuneration.

Financial planning advice fees

The fees or other costs associated with the services we offer and products we recommend depend on the complexity of your situation and the nature of the advice provided.

Your Adviser will discuss and determine the fees with you before providing any advice or services. Typically, payment for our services is through our financial planning advice fees.

We will clarify the method for calculating costs and provide you the actual costs in an agreement before starting any work that you will be charged for. You can ask for more information about the fees and the remuneration we may receive. The fees and charges for our advice and service may be based on a fixed dollar amount, percentage of funds invested, an hourly rate, or any combination of these.

Where we are aware that you have used borrowed funds to invest, including where we recommend that you borrow to invest, we will not charge you percentage-based fees on the borrowed amount.

Our financial planning advice fees generally include charges for providing you with a SoA, RoA, ongoing advice and services, or other transaction-related fees. You may choose to pay these fees directly or from an eligible financial product which you hold, or which we recommend.

Please refer to Part Two of this FSG for further details on fees that we charge.

Insurance commission payments

When we advise on an insurance policy that you hold, or we recommend, we may receive initial and ongoing commission payments from the product issuer.

An initial commission is a one-off payment made upon entry to a financial product and an ongoing commission is paid each year, starting from the second year, as long as you hold the policy. These commissions are a percentage of the premiums you pay. They are not paid directly by you but instead paid by the product issuer. We only receive commission where we are entitled to receive these payments through existing arrangements with product providers.

If you are charged a financial planning advice fee, we may rebate some or all of the above commission to you.

Detailed Commission Rates

Additional cover added to an existing product which was issued before 1 January 2018

The initial commission we receive on insurance products may be up to 124% of the first year's premium. The ongoing commission we receive may be up to 33% per annum of the renewal premium.

Additional cover added to an existing product which was issued after 1 January 2018 and before 1 January 2020

Where additional cover is added on or after 1 January 2019 and before 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that Count will receive will be no more than 77% of the increase in premium. The ongoing commission that Count can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

Additional cover added to an existing product after 1 January 2020

Where additional cover is added on or after 1 January 2020, to an existing product issued after 1 January 2018, the initial commission that Count will receive will be no more than 66% of the increase in premium. The ongoing commission that Count can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

New products issued on or after 1 January 2020

The initial commission that Count may receive on insurance products applied for and issued on or after 1 January 2020 will be no more than 66% of the premium in the year of issue. The ongoing commission that Count can receive will not exceed 22% p.a. of the premium (33% p.a. of the premium for level commission structures).

Referral fees

If you have been referred to your Adviser or us by a third party, Count Limited, Count or the Adviser's firm may also receive a benefit for referring you to third parties for

specialist services. These benefits are not passed on to your Adviser.

Class Super is Count's preferred third-party service provider of software to assist in the administration of Self-Managed Super Funds. In situations where you purchase this software Count Limited may receive up to 17.5% of the annual software licence fee.

If applicable, further details will be disclosed in Part Two of this FSG or within your SoA.

Count Bonus Scheme

Your Adviser is employed by a Corporate Authorised Representative (CAR) of Count and may also be a shareholder in that entity. This CAR may receive a monetary benefit which relates to the financial performance of Count, through participation in a bonus scheme. Whether the CAR receives any benefits depends on meeting specific criteria including financial and compliance standards.

Fee rebate or waiver

Count, your Adviser and/or we may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees are for the provision of support services provided by Count to its authorised representatives, including expenses such as annual membership fees, software and data service fees, paraplanning fees, as well as travel and accommodation costs related to conferences and training events.

Professional Development Sponsorship

Count Limited may receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help Count Limited to offset the organisational and running costs of providing education and training services to Count's authorised representatives.

Safeguards Adopted

Count has adopted safeguards to manage conflicts of interest that may arise wholly or partially in relation to the activities that we undertake. These may include:

- us providing full disclosure of the conflict of interest, potential conflict of interest, or perceived conflict of interest to you,
- us referring you to another adviser to provide advice to you, and
- us declining or withdrawing the services provided to you.

We consider these safeguards to be a robust and effective way to manage and prevent conflicts of interest. If we detect a conflict of interest, we will act as an impartial advisor would, prioritising advice that is in your best interests.

5. Complaints, privacy and compensation arrangements

How we handle your personal information

Count is committed to ensuring the privacy and security of your personal information. As part of its continuing commitment to client service and maintenance of client confidentiality, Count has adopted the principles set out in the Privacy Act 1988. For further details you can refer to Count's Privacy Policy, available at:

<https://www.count.au/privacy-policy>

If you wish to review your personal information held by us, please contact your Adviser directly, or Count by emailing info@count.au.

You may also contact the Australian Securities & Investments Commission (ASIC) on 1300 300 630 (free call info line) to make a complaint and obtain information about your rights.

As a financial service provider, we have obligations under the Anti-Money Laundering and Counter Terrorism Finance Act to verify your identity and the source of any funds. This means that we will ask you to present identification documents such as your passport or driver licence. We will also retain copies of this information. We cannot provide you with services if you are unwilling to provide this information.

What to do if you have a complaint

We are committed to resolving your concerns. If you are not fully satisfied with any part of the service or advice you have received, for whatever reason, you should take the following steps:

Step 1: Contact your Adviser

You should contact your Adviser in the first instance and discuss your concerns with them. Most complaints can be resolved quickly and fairly at this stage.

Step 2: Contact the Count Complaints Manager

If your complaint is not resolved by your Adviser to your satisfaction, or if you would prefer to contact Count directly to discuss the issue, it has an internal complaints process through which it independently reviews and seeks to address your concerns. In these circumstances your complaint will be escalated to the Count complaints manager who will aim to resolve your complaint quickly and fairly and will communicate a proposed solution to you. Count will try to resolve complaints as quickly as possible, and in any event within 30 days of receipt of your complaint. Count will let you know if it needs more time to finalise your complaint.

Writing: Count Complaints Manager
GPO Box 1453
Sydney NSW 2001

Phone: 1300 650 432 (option 2)

Email: reportcomplaints@count.au

Step 3: Contact the Australian Financial Complaints Authority (AFCA)

If you remain dissatisfied with the outcome provided by our, or Count's internal complaints processes, you are entitled to refer your complaint to the Australian Financial Complaints Authority (AFCA). AFCA is an external, independent body offering free and accessible dispute resolution services to individuals who have been unable to satisfactorily resolve their complaint.

Time limits may apply to complain to AFCA and so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

The AFCA contact details are set out below:

Writing: Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Online: www.afca.org.au

Phone: 1800 931 678 (free call)

Email: info@afca.org.au

Our compensation arrangements

Count has professional indemnity insurance cover in place and these arrangements comply with the requirements for compensation under the Corporations Act.

Count's professional indemnity insurance is subject to terms and exclusions and generally covers claims arising from the actions of our current and former employees or authorised representatives whilst they acted on Count's behalf.

Circle Wealth Pty Ltd

Financial Services Guide

ABN 52 628 349 048 | Corporate Authorised Representative No: 001268872

Version number: 24.02

PART TWO – ADVISER PROFILE

These adviser profiles are Part Two of the Count Financial Limited (Count) Financial Services Guide (FSG) 1 March 2024 and should be read in conjunction with Part One of our FSG dated 1 March 2024. Together these documents form the complete FSG.

Circle Wealth Pty Ltd is an Authorised Representative of Count Financial Limited (Count).

The individuals listed in this FSG are authorised by Count to provide personal advice through Burchart Pty Ltd ATF The Burchgart Family Trust.

Our contact details:

Address: Suite 1102, Level 11, 250 Pitt Street Sydney NSW 2000
Phone: 02 8066 0307
Web: circleadvisory.partners

Sacha Burchgart



Authorised Representative Number: 450128

Sacha is an Authorised Representative of Count and the principal and director of Burchart Pty Ltd and receives a salary plus a bonus payable if she satisfies a range of performance criteria.

Sacha has 12 years' experience in the provision of financial planning advice. Sacha attained Graduate Diploma Financial Planning from UNE 10 December 2021, Aged Care from UNE 15 April 2020, Advanced Diploma of Financial Planning from mentor Education 11 January 2018, Self-Managed Superannuation Funds from Mentor Education 24 March 2014 and Diploma of Financial Services (Financial Planning) from Kaplan Professional 4 April 2011.

She is a member of Financial Advice Association Australia and Self-Managed Super Fund Association

Sacha is authorised to provide advice in the following areas:

- Deposit and payment products
- Government debentures, stocks and bonds
- Life products
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation.

How to contact me: sacha@circleadvisory.partners or 02 8066 0307 or 0411 828 838

Natalie Nielsen



Authorised Representative Number: 410507

Natalie is an Authorised Representative of Count and employee of Burchart Pty Ltd and receives a salary only.

Natalie has 24 years of experience in the financial planning industry, 12 of these in the provision of financial planning advice. Natalie attained an Advanced Diploma in Financial Services on 20 June 2018 and a Diploma in Financial Services on 12 July 2010 from Kaplan Education Pty Ltd. She is a Member of Financial Advice Association Australia (FAAA).

Natalie is authorised to provide advice in the following areas:

- Deposit and payment products
- Government debentures, stocks and bonds
- Life products
- Managed investment schemes
- Retirement Savings Accounts
- Securities
- Superannuation.

How to contact me: natalie@burchart.com.au or 02 8279 9998 or 0404 091 780

Advice preparation and implementation fees

Prior to the provision of personal advice, we will agree upon a preferred payment option and disclose how our fee is calculated. Below is a summary of our available payment options that can be combined to pay for our services. We will provide you with a quote for our services before we undertake any work on your behalf.

These fee options include:

Time based charging

- i) The fee for the preparation and implementation of our advice is calculated based upon the time we spend developing the plan. Our hourly rate is \$440 per hour (incl. GST).

Price can vary depending on scope and complexity of the advice and we will provide you with an estimate of the overall cost. If extra charges apply, then we will inform you before proceeding with any work.

Service based charging

- ii) The fee for the preparation and implementation of our advice is calculated based upon a fixed price agreement. This fixed dollar amount will vary based upon the complexity of advice being provided and agreed upon prior to commencement. Our minimum fee for this is \$1,320 (incl. GST)

If you decide not to implement our recommendations, the fee for the preparation of the Statement of Advice will be payable in full.

Supplementary service fees

For supplementary services, such as the provision of general research material or the completion of administrative tasks, our fee will be calculated on a time basis of \$440 per hour.

Where you enter into an Ongoing Service Arrangement, Supplementary services are included, and will not be provided at an additional cost.

Ongoing & Fixed Term service fees

Our fixed term advice fees vary depending on scope and complexity and range from \$2,640 to \$10,100 (incl. GST) unless otherwise agreed. The exact cost of the fixed term review service will depend on the review offering we recommend and this will be disclosed within the Fixed Term Service Agreement we provide to you.

We will recommend an appropriate review package in light of your circumstances.

Should you require any additional services outside of any agreement between you and your adviser, an amount of up to \$440 per hour, may be applied.

**Non-advised
transaction fees**

If we assist you on an execution only basis (ie where you have been offered and declined advice), a fee of up to \$440 per hour will be applicable.

**Other third-party
payments we may
receive**

We may also receive the following fees, which are not payable by you.

Insurance Commissions

Where we facilitate the acquisition, or modification of a Life Insurance product, we may receive commissions as described in Part 1 of this FSG.

Where we provide advice in relation to the above transactions and charge an advice fee, we may choose to rebate part or all of the third-party payment, to you.



Privacy Policy

Count Limited (ACN 126 990 832)
As adopted by the Count Board

1. Privacy Policy

- 1.1 Count Limited and its related bodies corporate (collectively '**Count**', 'we', 'us', 'our') respect your privacy and are committed to protecting your privacy. We understand the importance you attach to information that identifies you (your 'personal information') and we want to help you protect it.
- 1.2 We are bound by, and committed to supporting, applicable privacy legislation including the *Privacy Act 1988* (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy ('Policy') explains how we collect, hold, use and disclose your personal information that we may obtain when you submit information to us in person, by mail or email or by visiting our website.

2. How do we collect and hold personal information about you?

- 2.1 We collect personal information from you in a variety of methods. Examples of the way we collect personal information include:
- through communications between you and our representatives or your adviser or accountant;
 - your use of our website;
 - you completing application forms in relation to products and services;
 - through other avenues, where required to meet regulatory requirements and comply with the law;
 - you apply for employment with us, and
 - through marketing activities which request information from you, such as surveys.
- 2.2 Because our products and services are often offered by intermediaries such as financial planners, solicitors or accountants, we may collect personal information about you from these third parties.
- 2.3 You are able to deal with us anonymously or by pseudonym unless it is impractical for us to deal with you where you have not identified yourself or have used a pseudonym. We require certain personal information to be able to provide you with services and information. 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 for information.
- 2.4 We will only collect personal information from you where it is reasonably necessary for us to provide our services to you or to perform our functions or activities.
- 2.5 We will only collect sensitive information from you with your consent, except in permitted general situations which include:
- the collection of the information is required or authorised by or under an Australian law or a court/tribunal order;
 - the collection is necessary to address a threat to an individual's life, health or safety; and
 - permitted health situations.
- 2.6 We may hold your information electronically or physically and have in place appropriate data and physical security measures and protocols to protect that information from loss or from disclosure not contemplated by this Policy.

3. What type of personal information do we collect?

- 3.1 The type of personal information we may collect from you includes (but is not limited to):
- names, address, email, phone numbers and job titles;
 - information in identification documents such as your 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;
 - visa or work permit status; and
 - personal information about your spouse and dependants.
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4. How do we use your personal information?

- 4.1 We will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement and related services, such as accounting or business advisory services or to meet obligations we may have at law, including in relation to health and safety.
- 4.2 We 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.
- 4.3 We may also use personal information we have collected from you for the purpose of marketing our services. If you do not want to receive marketing material from us, you can unsubscribe by contacting us as detailed below:
- For electronic communications, you can click on the unsubscribe function in the communication;
 - For hard copy communications, you can email us using the details in the 'How to contact us' section of our website informing us that you wish to unsubscribe <http://www.count.au/Contact-Us>
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5. How do we disclose your personal information?

- 5.1 Your personal information will only be disclosed:
- to our employees, contractors, consultants, dealers, agents or advisors as required to provide our services to you or for related purposes
 - to suppliers and service providers (for example accounting or auditing service providers or our website hosting service providers) in connection with our provision of services to you;
 - where you have consented to the disclosure;
 - where required or authorised to do so under an Australian law, court or tribunal order, or other governmental or regulatory body or agency;
 - in permitted health situations;
 - if we believe that the use or disclosure of the information is reasonably necessary for enforcement related activities conducted by, or on behalf of, an enforcement body; or
 - in connection with an actual or proposed sale, reorganisation or transfer of all or part of our business, including as set out in clause 16.1.
- 5.2 We may use, store, process or back-up your personal information on servers that are located overseas (including through third party service providers). The privacy laws in other countries might not be the same as in Australia. However, where we provide your personal information to third parties overseas, we will take such steps as are reasonable to ensure that your information is handled and stored in accordance with Australian privacy laws and this Policy. Currently, we use outsourced service providers in the Philippines, India and Serbia.

6 Access to your personal information

- 6.1 You can request us to provide you with access to personal information we hold about you by sending us an email: privacy@count.au (no spam please) or writing to us at Level 1, 45 Clarence Street, Sydney NSW 2000.
- 6.2 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.
- 6.3 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.

7 Accuracy and correction

- 7.1 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: privacy@count.au (no spam please) or writing to us at Level 1, 45 Clarence Street, Sydney NSW 2000.

8 Our security procedures

- 8.1 We take your privacy and the privacy of our 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.
- 8.2 We will also deidentify 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.
- 8.3 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 our control may be able to access or intercept transmissions or private communications without our permission or knowledge. We take 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.

9 Data breach notification

- 9.1 We are required to give notice to the Office of the Australian Information Commissioner (**OAIC**) and affected individuals of an "eligible data breach". This means that if we hold personal information about you, and there is unauthorised access to or disclosure of your personal information, and if you, as the "affected individual" would be likely to suffer serious harm from this access or disclosure, we must notify both you and the OAIC.
- 9.2 "Serious harm" could include identity theft, threats to physical safety, economic and financial harm, harm to reputation, embarrassment, discrimination or harassment. The test is whether a "reasonable person" would expect you to suffer serious harm.
- 9.3 If you are likely to suffer serious harm from a data breach, we will notify you of:
- the nature of the eligible data breach (i.e. how the information was accessed or disclosed);
 - the type of information that was accessed or disclosed;
 - the steps that we have taken to control or reduce the harm, and those that we plan to take;
 - any assistance we can offer you, such as arranging for credit monitoring;
 - anything that we can suggest you can do to assist yourself or mitigate the harm;

- whether the breach has also been notified to the OAIC;
- how you can contact us for information or to complain; and
- how to make a complaint with the OAIC.

9.4 We will notify you using the same method that we usually use to communicate with you. If it is not practicable for us to notify you personally, we will publish the notification on our website.

9.5 There are some circumstances in which we do not have to notify you of a data breach. These include:

- where we have taken remedial action before any serious harm has been caused by the breach;
- if you have been notified of the breach by another entity;
- if notification would be inconsistent with Commonwealth secrecy laws; or
- where the OAIC declares that notification does not have to be given.

9.6 Depending on the nature of the breach and the harm, we may voluntarily, inform other third parties such as the police or other regulators or professional bodies.

10 Identifiers

10.1 We will not adopt as our own, any government identifiers you may provide to us such as TFNs and will not store these identifiers on any information.

11 Links to other sites

11.1 We may provide links to other sites for you to access. You should be aware that these other sites are not subject to this Policy or our privacy standards and procedures. You will need to contact them directly to ascertain their privacy standards.

12 Cookies

12.1 Our 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.

12.2 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.

13 Changes to our Privacy Policy

13.1 From time to time, we may vary this Policy for any reason. We will publish any changes on this website.

13.2 By continuing to use our website and continuing to provide us with your information, you confirm your acceptance of these changes.

14 Complaints resolution

14.1 We are 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 us an email at privacy@count.au or write to us at Level 1, 45 Clarence Street, Sydney NSW 2000. 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.

14.2 If after receiving our 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.

15 Disclaimer

- 15.1 By using our website, you signify your understanding and agreement to comply with all terms and conditions and confirm your acceptance of the terms of this Policy and consent to the use of your personal information as set out in this Policy.
- 15.2 If you do not agree with the terms of this Policy, please do not use the website or otherwise provide us with your personal information.

16 Business Assignment

- 16.1 In the event of a sale, reorganisation or transfer of all or part of our business (**Business Assignment**), you agree to the transfer of your personal information to the purchaser of the business, as reasonably required for the ongoing provision of services to you, and consistent with the terms of this Policy (unless otherwise permitted or required by law).
- 16.2 In the event of a Business Assignment, to the extent reasonably practicable, you will be notified of the transfer of your personal information.

Document control

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