



Financial Services Guide – Part 1

Version number 25.0, 1 November 2025

This Financial Services Guide (FSG) has been authorised for distribution by Count Financial Limited (ABN 19 001 974 625), the holder of 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.

The purpose of this FSG

This document provides information to help you decide whether to use the financial services we are authorised to provide. It includes details about the financial services and products we are authorised to offer you, the types of documents you may receive, any conflicts of interest we may have and how we, Count, and related parties are paid for the services provided, and our complaint handling process and options available if you are dissatisfied with our services.

This FSG is provided in two parts and both parts must be read together. Part One contains information about Count and the general obligations and arrangements that apply to all authorised representatives. Part Two is the Adviser Profile, which outlines information specific to your Adviser and their firm, including services offered and applicable fees.

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:	(02) 8218 8778
Email:	info@count.au

Not independent

We acknowledge that we are not independent, impartial, or unbiased. In general, we provide personal advice that aligns with the Licensee's Approved Product List (APL), which may include financial products and services associated with the Licensee. We may receive commissions for recommending life insurance products and non-monetary benefits such as training and educational seminars from product providers.

About Count

Count is a subsidiary of Count Limited ABN 111 26 990 832 ("Count Limited"). Count provides client engagement services, training, licensing, compliance, investments advice and support services to us.

About Count Limited

Count Limited is an Australian public company listed on the Australian Stock Exchange (ASX:CUP). Count Limited operates a network of professional accounting and financial advice firms. Count Limited also operates a services segment that specialises in the delivery of education and expertise to accountants and advisers.

Other relationships which might influence Count in providing financial advice services

Hub24 Limited

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 included on the Count Approved Product List (APL) and is available for use by us where appropriate. We are obligated to act in our clients' best interests at all times and will only recommend the use of the Hub24 platform if it is suitable for your needs.

We continue to use a range of other platforms to implement investment advice, and you are welcome to request an alternative platform if you prefer. Importantly, we are not subject to any incentives, sales targets, or under any obligation to recommend the Hub24 platform.

CARE Managed Portfolios

DWA Managed Accounts Pty Ltd (AFS licence no. 264125) (DWA) is a wholly owned subsidiary of Count Limited. DWA is the investment manager for each of the CARE Managed Portfolios. DWA has appointed an investment committee that is responsible for implementing the investment philosophy, investment strategy and investment process for the CARE Managed Portfolios and receives fees for the provision of these services.

These fees, where applicable, will be disclosed in your Statement of Advice (SoA).

No part of this fee is paid to Count.

Philo Capital Advisers – Managed Discretionary Account (MDA) Service

Your adviser may recommend the Managed Discretionary Account (MDA) service provided by Philo Capital Advisers Pty Ltd (Philo) (ABN 70 119 185 974, AFSL 301808). More information about Philo is available at www.philocapital.com.au.

If you use this service, Philo will be responsible for managing your investment portfolio in line with an agreed Investment Program. This program is based on your financial objectives and strategy, which your adviser will help you establish. Philo, or a portfolio manager appointed by them, will make and implement investment decisions to keep your portfolio aligned with your agreed strategy.

Your adviser does not operate the MDA. Their role is to provide you with personal advice and recommend the service if it is appropriate for your needs. Philo is responsible for the day-to-day management of your investments, while a platform provides custody and administration services.

Fees for the service are paid from your account and include an MDA portfolio management fee. Your adviser may also receive advice fees as agreed with you. In addition, Count may receive a fee of 0.05% - 0.15% (excluding GST) from Philo in connection with the referral. All fees and payments will be clearly disclosed in your Statement of Advice (SoA). You should carefully read the SoA, MDA Contract and the Investment Program before deciding to proceed.

Safeguards to manage conflicts of interest

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:

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

We consider these safeguards to be a robust and effective approach to managing and preventing conflicts of interest. If we detect a conflict of interest, we will act as an impartial advisor would in your interests.

Documents you may receive

Documents may be provided electronically to your nominated email address, unless agreed otherwise. The following documents may be received by you 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. This document outlines the advice provided, the reasons for the advice, and any remuneration payable by you and/or received by us or Count. The information contained in the SoA is designed to help you make an informed decision about whether to act on the advice.

Record of Advice (RoA)

In certain circumstances, if you have previously been issued with a SoA, your Adviser may provide further advice without the need for another SoA. In these cases, a Record of Advice (RoA) will be prepared. Additionally, where advice is provided on a small investment balance, a RoA may also be issued. The RoA will outline the advice, the reasons for the advice, and details of any remuneration payable by you and/or received by us or Count. Your Adviser may provide you with a copy of the RoA.

Product Disclosure Document (PDS)

You will receive a PDS or a link to the website where you can locate the 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.

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

Under Count's AFS licence, we are permitted to provide financial advice and services across a wide range of financial products. These include:

- Deposit and payment products including basic deposit, non-basic deposit, and non-cash payment products
- Government debentures, stocks or bonds
- Life products including investment life insurance and life risk insurance products
- Managed investment schemes including Investor Directed Portfolio Services (IDPS)
- Retirement savings account products
- Securities
- Superannuation, and
- Standard margin lending facility

Your Adviser is authorised to provide advice in some or all of these areas and may also be authorised in other specialist advice areas. These are outlined in Part Two of this FSG.

Approved products

Authorised representatives of Count are generally restricted to recommending products that appear on Count's APL. These products have been assessed through a robust due diligence and approval process managed by Count Limited's specialist product research team, with the support of independent research providers.

Count may use Lonsec Research as a primary research provider in constructing the APL. Lonsec Research is a wholly owned subsidiary of Lonsec Holdings Pty Ltd (ABN 41 151 235 406). Another subsidiary of Lonsec Holdings, Lonsec

Investment Solutions Pty Ltd (ABN 95 608 837 583), manages portfolios that may also be included on the APL.

Count has also established a partnership program with a number of financial product issuers. While these issuers may have products included on the APL, any financial benefits received through the program are strictly used to fund education initiatives for Count representatives and do not influence product selection.

While other financial products may also be suitable to your needs, your Adviser will generally only recommend products listed on the Count APL. If, based on your objectives, financial situation and needs, a product outside of the APL is considered appropriate, it must still meet Count's selection criteria and approval requirements before being recommended.

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

In limited circumstances, we can arrange financial product transactions for you on your instruction without providing personal advice. In some cases, you may be asked to confirm your instructions in writing and sign an acknowledgment form to confirm that you are proceeding without advice. 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 the financial services or products provided by your Adviser in their capacity as an authorised representative of Count. This does not include any other services your Adviser may provide in another capacity, such as acting as an accountant, tax agent or in another professional role, such as:

- Taxation advice and services (e.g. preparing and lodging 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, mortgage schemes, derivatives, general insurance or direct international share holdings
- Any other services not provided under Count's authorisation

It is important that you understand which services are being provided under Count's licence and who is responsible for them. If you are unsure, please speak with your Adviser or contact Count for clarification.

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.

Instructing us

You may provide instructions in writing—by post or email—as agreed with your Adviser. In limited circumstances, and only where specifically agreed, instructions may be accepted over the phone.

Remuneration and fees

All advice fees, including non-advised fees, and commissions are 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. They 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 advice and service fees may be calculated using a fixed dollar amount, a percentage of invested funds, an hourly rate, or a combination of these methods.

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 initial advice, 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 the 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 by the product issuer when you first take out a financial product. An ongoing commission may also be paid by the product issuer each year from the second year onward, for as long as you hold the policy. These amounts are not paid directly by you but are built into the cost of the product. We only receive commission where we are entitled to do so under existing arrangements with the product issuer.

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

Detailed insurance commission rates

Initial commissions: Up to 66% of the first year's premium for new policies implemented from 1 January 2020. We may receive commissions on increases or additions to existing policies of up to 66%.

Ongoing commissions: Up to 33% of the insurance premium each following year.

For example: On insurance policies implemented from 1 January 2020, if your insurance premium was \$1,000, we would receive an initial commission of up to \$660. We would receive an ongoing commission of up to \$330 pa.

Referral fees

If you have been referred to your Adviser or to us by a third party, a referral payment may be made to the referrer by us, Count Limited or Count. Similarly, we, Count Limited or Count may 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 of referral agreements will be disclosed in Part Two of this FSG or in your SoA.

Fee rebate or waiver

Count, your Adviser and/or we may also receive fee waivers, fee subsidies and/or fee reimbursements. These fees relate to support services provided by Count to its authorised representatives and may cover 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 may receive sponsorship payments from product providers which are in no way linked to volume of sales. These sponsorship arrangements help Count to offset the organisational and running costs of providing education and training services to Count's authorised representatives.

What else should you understand?

How we handle your personal information

We are committed to ensuring the privacy and security of your personal information. As part of our continuing commitment to client service and maintenance of client confidentiality, we have adopted the principles set out in the Privacy Act 1988. For further details you can refer to Count's Privacy Policy, available at: www.count.au/privacy

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 your Adviser may ask you to present identification documents such as your passport or driver's license and may also retain copies of this information. They cannot provide you with services if you are unwilling to provide this information.

Some of our financial advisers may enter their own outsourcing arrangements with providers located in countries other than those detailed in our Privacy Policy. Details of the countries we disclose to you may change from time to time. Those arrangements will be disclosed separately by the financial adviser to you.

We may use artificial intelligence (AI) tools to assist in providing services to you. These tools are used responsibly to support quality and efficiency, and you will always be asked for your permission before any conversation is recorded.

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

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 Adviser cannot resolve your complaint, or you wish to contact Count directly, an internal process is available for reviewing your concerns impartially.

Your complaint will be escalated to the Count Complaints Manager, who will aim to resolve it quickly and fairly. They will communicate a proposed solution to you and attempt to resolve the complaint within 30 days of receipt. You will be informed if more time is needed to finalise the matter.

Writing:	Count Complaints Manager GPO Box 1453 Sydney NSW 2001
Phone:	(02) 8218 8778
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, or if you have a complaint that is not satisfactorily resolved within 30 days, 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:

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

Any issue about your personal information, you can contact the OAIC:

Writing:	The Office of the Australian Information Commissioner GPO Box 5218 SYDNEY NSW 2001
Online:	www.oaic.gov.au
Phone:	1300 363 992 (free call)
Email:	enquiries@oaic.gov.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.

Professional indemnity insurance

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.



Financial Services Guide – Part 2

Version number 25.0, 1 November 2025

This FSG Part 2 contains information specific to your Adviser and their firm and should be read together with the FSG Part 1, Version Number 25.0, which contains information about the AFS licensee and their general obligations and arrangements. Count Financial Limited (Count'), has authorised your adviser to distribute this FSG.

The financial services provider

Your Adviser(s) is/are authorised to provide financial services as:

An authorised representative of Count AFS licence no. 227232, ABN 19 001 974 625, authorised to provide the financial services described in this FSG through Circle Wealth Pty Ltd ABN 52 628 349 048. ASIC ID number 001268872.

Referral arrangements

Circle Wealth Pty Ltd may have referral arrangements with other professional service providers. Currently, Circle Wealth Pty Ltd does not receive or pay referral fees or other benefits for these referral arrangements. We will only refer you to third party professionals, where we believe it is in your best interests to do so.

Please refer to FSG Part 1, for further information on other relationships that might influence Count in providing financial advice services, we will also disclose any associations or conflicts in the Statement of Advice that we prepare for you.

Fees

These fees should be considered a guide only. We will discuss your individual needs and agree our fees with you before we provide advice. The actual agreed fees will depend on the complexity of your circumstances, goals and needs and the scope of advice we provide. Please note that fees may be higher than those outlined here if mutually agreed upon. The indicative fees we charge are set out below:

Advice Preparation and Implementation fees:	The fee for the preparation and implementation of our advice is calculated as follows: ○ Time based charging: Our minimum fee is \$440 per hour ○ Service based charging: Our minimum fee is \$1,320
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.
Ongoing & Fixed Term Service Fees:	These are the fees you pay when you agree to receive our ongoing or fixed term advice. Our services will be agreed with you in a Client Service Arrangement. ○ Our minimum fee is \$2,640 per annum ○ Our maximum fee is \$10,100 per annum
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.

Note: All fees are inclusive of GST.

Our contact details

Circle Wealth Pty Ltd

Phone: 02 8066 0307

Website: www.circleadvisory.partners

Email: sacha@circleadvisory.partners

Office Address: Suite 1102, Level 11, 250 Pitt Street Sydney NSW 2000

Our Privacy Collection Statement

We collect personal information about you (and, if applicable, anyone acting on your behalf) to help us provide financial services that are suited to your needs, to manage our relationship with you, and to meet our legal obligations under the Privacy Act 1988 and the Corporations Act 2001.

This statement forms part of our broader Privacy Policy, and together they make up our formal notice under Australian Privacy Principle 5.

Why we collect your information

We need certain information to understand your financial situation and provide appropriate advice or services. The specific information we collect will depend on who you are and the nature of the services you need.

If you choose not to share some details, or if the information is incomplete or inaccurate, it may limit our ability to provide advice or services to you, or we may not be able to proceed at all. It could also mean that the advice you receive is less tailored to your situation. In some cases, we may need to end our relationship if we cannot properly meet your needs.

Who we may share your information with

To deliver our services, we may need to share your information with:

- Product and platform providers
- External service providers (e.g. paraplanners, IT providers)
- Other professionals you've authorised us to work with (e.g. your accountant or tax adviser)

Circle Wealth Pty Ltd may engage the services of external services providers both here and overseas who supply administrative, financial or other services to assist us to provide financial and services to you.

- Koruna Assist providing administrative and back-office support services. This provider's contracted staff are located in the Philippines.
- 5 ELK providing administrative and back-office support services. This provider's contracted staff are located in the Philippines.
- Mutual Plans providing paraplanning services. This provider is located in Australia.
- Solutions Centric providing paraplanning services. This provider's contracted staff are located in India.

Sharing information overseas

Some service providers we use may be located overseas or have operations outside Australia. Your personal information might be stored or accessed in these countries. We take reasonable steps to make sure your information is protected and handled in line with the Australian Privacy Act.

For more information about which countries your information may be sent to, please refer to Count's [Privacy Policy](#) or contact us directly. If you do not wish for your information to be transferred overseas, please let us know.

Accessing or correcting your information

If you think any of the details that we hold are incorrect or out of date, please contact us to correct this. You can ask to access or correct your personal information at any time by contacting us.

A copy of our Privacy Policy is on Count's website www.count.au. We can also send you a copy if you contact us.

ADVISER PROFILE

About Sacha Burchgart



The Authorised Representative number for Sacha Burchgart is 450128 and their details are available on the [Financial Advisers Register](#).

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

What experience does the adviser have?

Sacha has been providing financial planning advice since 2011. She is a member of the Financial Advice Association Australia and the Self-Managed Superannuation Fund Association.

What qualifications has the adviser completed?

- Graduate Diploma of Financial Planning from University of New England on 10 December 2021
- Aged Care from University of New England on 15 April 2020
- Advanced Diploma of Financial Planning from Mentor Education on 11 January 2018
- Self-Managed Superannuation Funds from Mentor Education on 24 March 2014
- Diploma of Financial Services (Financial Planning) from Kaplan Professional on 4 April 2011

What products and services can the adviser provide?

Sacha is authorised to provide the following products and services:

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

What other associations and relationships does the adviser have?

Sacha is also the principal and director of Burcheart Pty Ltd (Authorised Representative No. 408640 of Count) who charges Circle Wealth Pty Ltd management fees for providing financial advice services to Circle Wealth Pty Ltd clients. Sacha receives a salary only from Burcheart Pty Ltd.

How will your financial adviser be paid for the services provided?

All fees and commissions disclosed in the FSG which are attributed to the services provided to you by your adviser are paid to Count who will pay up to 100% of those fees and commissions to Circle Wealth Pty Ltd.

Sacha is the principal and director of Circle Pty Ltd and receives a salary only from Burcheart Pty Ltd.

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
- 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.

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 at info@count.au or use the details in the 'Contact us' section of our website informing us that you wish to unsubscribe [Contact - Count](#).

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, Malaysia 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 11, 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 11, 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 We use cookies and pixel tags (also referred to as web beacons, web bugs or clear gifs) to collect web site usage information. We use cookies to remember your browser between page visits. The cookie identifies your browser, not you personally. No personal information is stored within our cookies. Count places third party pixel tags on its web sites to allow web analytics. Count does not obtain personally identifiable information from the pixel tags.

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 11, 45 Clarence, 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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