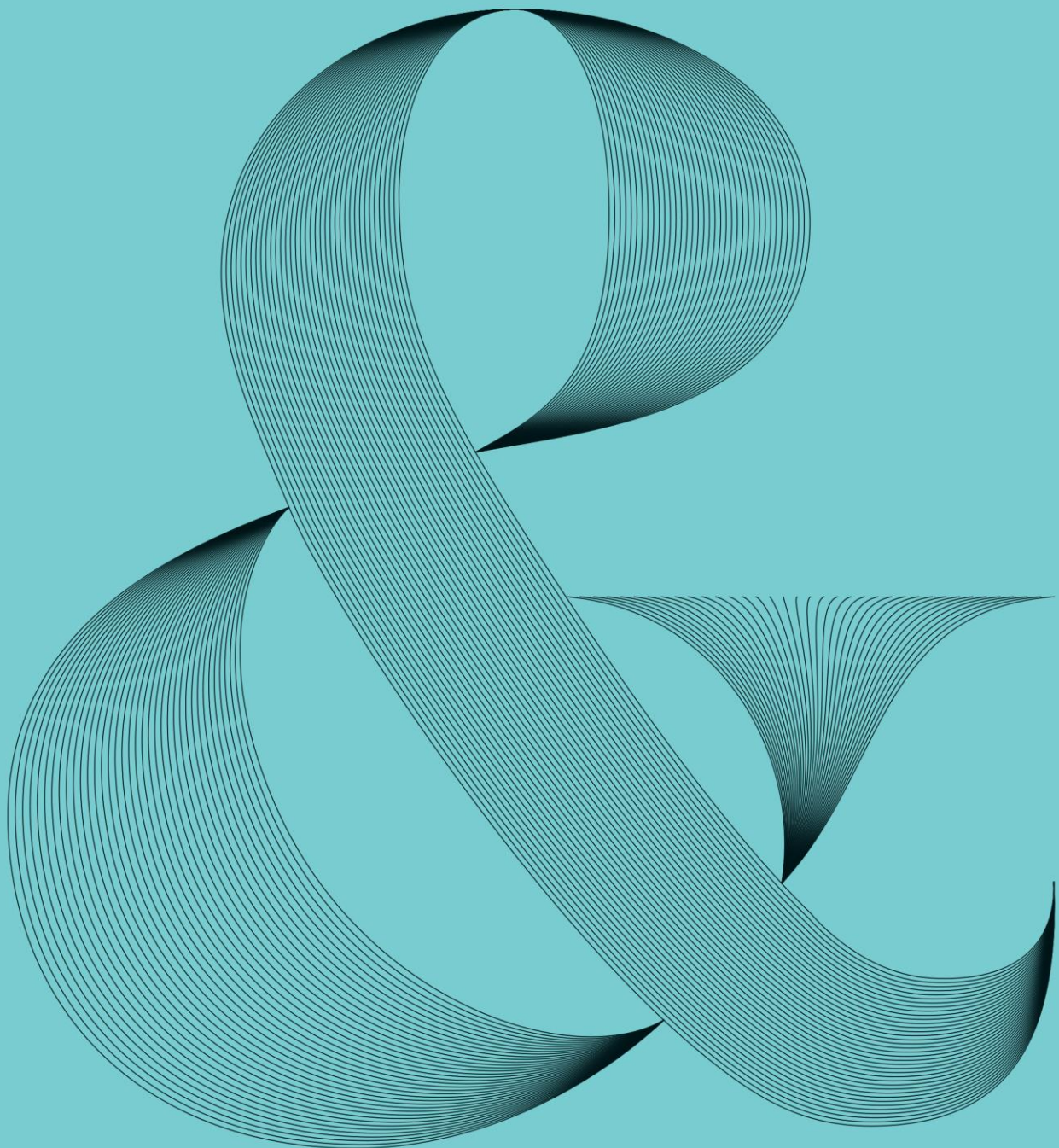


# Financial Services Guide

Count Financial Limited  
AFSL no. 227232  
Part 1 – V21.00  
Part 2 – V21.02



# Financial Services Guide

**Version number 21.00**  
**1 June 2021**

## 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, AFSL no. 227232 ('Count'). Count is the financial services 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.

We are authorised by Count to provide financial planning services to our clients. We act on behalf of Count which means that Count is responsible for the services outlined in this FSG.

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.

## Contacting us

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

## Part One

Part One of this FSG provides information about:

- Count as the holder of the Australian financial services 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 we, 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 prevent 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 '*Commission Payments*', in section 4, below.

#### Count's Approved Product List (APL)

Authorised Representatives of Count are generally restricted from recommending products which are not included on 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 operates a partnership program with a number of financial product issuers, whereby financial benefits are received by Count. 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 Approved Product List (APL).

Count Financial Limited is a wholly owned subsidiary of CountPlus Limited ABN 111 26 990 832. Colonial First State Group Limited ACN 004 405 556 is a substantial shareholder in CountPlus. Products issued by Colonial First State Group Limited, may appear on Count's APL.

For more information on Count's Approved Product List, refer to '*Approved Products*', in section 3, below.

## 1. About Count Financial Limited

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

## Count's relationship with CountPlus

CountPlus Limited ABN 111 26 990 832 owns 85% of the shares in the Licensee and Count Member Firm Pty Ltd ACN 633 983 490 owns the remaining 15% of the shares in Count. CountPlus Limited has subsidiaries and associates that provide accounting and financial advice services. Many of the CountPlus subsidiaries and associates that provide financial advice services do so as corporate authorised representatives of 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)

If you were previously issued with a Count SoA, certain circumstances may allow the provision of further advice without the need for another SoA. Where this is the case, you are entitled to request a RoA within seven (7) years after the advice was provided. The RoA can be requested from your Adviser and will detail the further advice and the basis of those recommendations. Additionally, in certain circumstances where you are provided advice on a small investment balance or strategy advice only, you may be issued with a RoA. Your Adviser is required to provide you with a copy of the RoA in this circumstance, 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 on 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

Our licence can provide advice, and deal in, 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

Our specialist product research team undertakes due diligence on product providers and also use independent research providers to select a range of high-quality products worthy of recommendation to our clients.

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 Approved Product List ('Count APL').

All products on the Count APL must meet our rigorous selection criteria and approval process to be listed on the Count APL.

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 happens, any product that your Adviser may recommend needs to meet our 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-advisory 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 we are not responsible for

We are 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 and referrals
- 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 dealings with your Adviser you must satisfy yourself as to who is responsible for the advice or services

provided to you. If you require further clarification, please do not hesitate to contact Count.

Count is registered with the Tax Practitioners Board as a Registered Tax (Financial) Adviser. 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 claim entitlements that arise, or could arise, under a taxation law.

#### **4. Remuneration that we or Count may receive**

All advice fees and commissions are required to be paid directly to Count as the licensee. Count may retain a percentage and the balance that is attributable to the financial services we provide is passed on to us.

If the fees, commissions or benefits are not calculable prior to the commencement of our services we provide, we will describe the manner in which they are calculated, and provide an estimate of the applicable remuneration.

##### **Financial planning advice fees**

The fees or other costs that we may charge for services provided or products recommended, depends on the nature and complexity of your situation and the advice that is provided.

Your Adviser will agree with you the form and amount of charges before they provide any advice or services. The general way you pay for our services is through our financial planning advice fees.

The methods are explained below, and the actual costs, will be disclosed to you in an agreement, before we undertake this work at your expense. You have the right to request further information in relation to the remuneration, the range of amounts or rates of remuneration that we or your Adviser 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 through us, including where we recommend that you borrow to invest, we will not charge you percentage based fee on any borrowed amount.

Our financial planning advice fees generally include charges for providing you with a SoA, RoA, ongoing advice and services, or it can be for other fees, such as a fee for a transaction. 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 for which a financial product is maintained beginning from year two. These commissions are based on a percentage of the funds you invest, or the premiums you pay. They are not paid directly by you and are 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 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 receives 17.5% of the annual software licence fee.

- SUPERCentral is Count's preferred third-party service provider for preparing trust deeds. In situations where you utilise their services, Count receives between 25% and 46% of revenues that SUPERCentral receives as a result of the referral.
- Count also has a referral arrangement in place with Townsends Business and Corporate Lawyers (Townsends). If you use the services of this provider as a result of a referral from us, Count will receive up to 10% of the invoice payable by you to Townsends and this is not an additional cost to you.

If applicable, further details will be disclosed in Part Two of this FSG at 'Referral Arrangements' and in your SoA.

## Count Member Firm Trust

Your Adviser is employed by a Corporate Authorised Representative (CAR) of Count Financial and may also be a shareholder in the entity. This CAR may be a beneficiary under a discretionary trust in which Count Member Firm DT Pty Ltd holds the assets as trustee for that trust. These assets are all of the shares in Count Member Firm Pty Ltd. Count Member Firm Pty Ltd owns 15% of Count Financial. Whether a benefit is received by the CAR will be determined by the CAR satisfying certain key indicators which may include 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 and includes such items as annual membership fees, software and data service fees, Paraplanning fees and the travel and accommodation costs associated for attending 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 us to offset the organisational and running costs of providing education and training services for our Advisers.

## 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 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, and
- declining or withdrawing the services provided to you.

We believe these safeguards are a sound and effective

means for controlling and avoiding conflicts of interest. Where we have identified a conflict of interest, we will act as a reasonable advice provider without a conflict would do, including providing advice that is in the client's best interests.

## 5. Complaints, privacy and compensation arrangements

We always strive to provide quality advice and service and welcome any feedback that allows us to continue to improve our services.

### How we handle your personal information

Count and 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 Count has adopted the principles set out in the Privacy Act 1988. For further details you can refer to our Privacy Policy, available at:

[www.count.com.au/privacy](http://www.count.com.au/privacy)

If you wish to review your personal information held by Count, please contact us by phoning (02) 8218 8778 or emailing [privacy@count.com.au](mailto:privacy@count.com.au).

As a financial service provider, we have an obligation 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 assure you that this information will be held securely. 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

If you have a complaint or are not satisfied with the advice or services provided to you, 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: Complaints Manager

If your complaint has not been resolved to your satisfaction, you can contact our Complaint Resolution Manager by:

Writing: Complaint Resolution Manager  
Count Financial Limited  
Level 8, 1 Chifley Square  
Sydney NSW 2000

Emailing: [reportcomplaints@count.com.au](mailto:reportcomplaints@count.com.au)

Phone: (02) 8218 8778

#### Step 3: Australian Financial Complaints Authority (AFCA)

If you are not satisfied with our handling of your complaint or our decision, you may refer your complaint to the Australian Financial Complaints Authority (AFCA) at any time. AFCA offers a free independent dispute resolution service for consumer and small business complaints.

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

Online: [www.afca.org.au](http://www.afca.org.au)

Phone: 1800 931 678 (free call)

Email: [info@afca.org.au](mailto:info@afca.org.au)

Information about your rights can also be obtained from the Australian Securities and Investments Commission on 1300 300 630.

#### Our compensation arrangements

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

Our 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 our behalf.

# Kofkin Bond & Co Financial Services Guide

ABN 33 141 597 266 | Authorised Representative No: 269687

Version number: 21.02

## PART TWO – ADVISER PROFILE

This adviser profile is Part Two of the Count Financial Limited Financial Services Guide (FSG) 06/05/2022 and should be read in conjunction with Part One of our FSG dated 1 June 2021. Together these documents form the complete FSG.

Kofkin Bond & Co Pty Ltd is an Authorised Representative of Count Financial Limited (Count).

The individual(s) listed in this FSG are authorised by Count to provide personal advice through Kofkin Bond & Co Pty Ltd.

### Our contact details:

Address: Level 9, 21 Victoria Street, Melbourne Victoria 3000

Phone: 03 9111 2675

Email: [enquiries@kofkinbond.com.au](mailto:enquiries@kofkinbond.com.au)

Web: [www.kofkinbond.com.au](http://www.kofkinbond.com.au)

### Anthony Kofkin



### Authorised Representative Number: 269687

Anthony Kofkin is an Authorised Representative of Count and a Director of Kofkin Bond & Co and receives a salary as his only form of remuneration.

Anthony has 30+ years of experience in the provision of financial planning advice. Anthony attained RG 146 compliance from RMIT on 20 November 2003 and SMSF Accreditation from Kaplan 25 October 2015. He is a Practitioner Member of the Association of Financial Advisers.

Anthony 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
- Margin Lending Facilities
- Superannuation

How to contact me: [tkofkin@kofkinbond.com.au](mailto:tkofkin@kofkinbond.com.au) or 03 9111 2675

## Matthew Leech



### Authorised Representative Number: 318407

Matthew Leech is an Authorised Representative of Count and a Principal Planner of Kofkin Bond & Co and receives a salary plus bonuses as forms of remuneration. Any bonus paid is done on a balance scorecard.

Matthew started in financial advice in 2007. Matthew attained Diploma of Financial Services from AMP on 31/01/2008 and Advanced Diploma of Financial Planning from Mentor Education on 10/09/2012. He is a Practitioner Member of the Association of Financial Advisers. Matthew also holds the following accreditations:

- Certificate IV in Financial Services (Finance/Mortgage Broking) (Traineeship Management Australia) 14/03/2008
- SMSF Accreditation (Kaplan) 12/03/2014
- Qualified Property Investment Professional (PIPA) 22/12/2016
- Fellow Chartered Financial Practitioner (FCHFP) (Kaplan/AFA) 31/08/2016

Matthew 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: [mleech@kofkinbond.com.au](mailto:mleech@kofkinbond.com.au) or 02 8325 1338**

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## Joshua Kofkin



### Authorised Representative Number: 1271255

Joshua Kofkin is an Authorised Representative of Count Financial and the Senior Associate of Kofkin Bond & Co and receives a salary plus bonuses as forms of remuneration. Any bonus paid is done on a balance scorecard.

Joshua started in financial advice in 2017. Joshua attained a diploma of financial planning from Kaplan Professional on 03/10/2018 and Graduate Diploma of Financial Planning from Kaplan Professional on 12/11/2021. He is a Practitioner Member of the Association of Financial Advisers. Matthew also holds the following accreditations:

Joshua 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: [joshua@kofkinbond.com.au](mailto:joshua@kofkinbond.com.au) or 03 9111 2675**



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**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:

**\*Service based charging**

- i) 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 \$1,100 (incl. GST) up to a maximum of \$22,000 (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.**

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**Ongoing service fees**

To ensure you are continually on track to achieving your goals and prepare you for the years ahead, we charge an ongoing service fee. Our ongoing service fee eliminates hourly rates and equates to non-property related investments only. These fees are only applicable to investments that we manage on your behalf and are paid out of the products that we manage for you. Our Ongoing Service Fee & Funds Management Fee vary from 0.55% to 1.21% of balance.

Our value-added funds management fee starts at 0.33% for the first \$2mill (incl. GST) assets under management fees on all funds that we manage on your behalf whether they are direct (e.g. direct equities) or using specialist managers

<b>Investment Balance</b>	<b>Ongoing Service Fee (percentage-based)</b>	<b>Funds Management Fee (percentage-based)</b>	<b>Total Fee</b>
\$0M to \$2,000,000	0.88% of your balance	0.33% of your balance	1.21%
\$2,000,000 to \$3,000,000	0.66% of your balance	0.22% of your balance	0.88%
\$3,000,000+	0.44% of your balance	0.11% of your balance	0.55%
Geared Investments (excluding property)	Flat Fee calculated on your equity contribution	N/A	Flat Fee calculated on your equity contribution

We do not charge a percentage-based fee on any geared or borrowed investments. The ongoing service fee will be a flat fee and will be disclosed in your Statement of Advice.

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**Non-advised transaction fees**

If we assist you on an execution only basis (ie where you have been offered and declined advice), an hourly fee of up to \$660 per hour will be applicable.

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**Supplementary Services Fee****Hourly fee \$220.00 to \$660.00**

If you have signed up to one of our Ongoing Service Packages, you do not need to pay an hourly fee for as long as you are a client of Kofkin Bond & Co. If you are seeking one-off independent advice, our hourly fee is between \$220.00 to \$660.00 (incl GST). No fee will be payable until you have acknowledged and agreed to the cost of services with a member of our team.

**Budgeting & Cash Flow Course \$550**

We offer 2-month budgeting & cash-flow course with one of our senior associates. The course includes four (4) group sessions and one (1) independent session and takes you through the specifics of how to automate your budget and maximise your cash-flow.

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**Other associations  
and relationships**

Anthony Kofkin is a shareholder of both Kofkin Bond & Co and Kofkin Bond Capital which are separate entities.

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**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.

The payments we receive covers the time and work we do liaising with the Insurance providers on your behalf to place your valuable insurance cover in force.

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.

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# Privacy Policy

<https://www.count.com.au/privacy>

CountPlus Limited (“**CountPlus**”) respects your privacy and is committed to protecting your privacy. At CountPlus, we understand the importance you attach to information that identifies you (your ‘personal information’) and we want to help you protect it.

We are bound by and committed to supporting, the Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs). This Privacy Policy explains how we handle information that we learn about you when you submit any personal information to us or our associated entities in person, by mail or email or by visiting our website.

## How do we collect personal information from you?

We will only collect personal information which you have voluntarily provided to us, or consented to us collecting the information.

We may collect personal information about you in a variety of ways, for example:

- when you visit or use our website;
- when you retain our services;
- when you register for secure access to our website and log-in to your account on our website (if applicable);
- when you subscribe to our newsletter or mailing list (if applicable);
- when you contact us or our associated entities, for example by mail, email or telephone;
- when you apply for employment with us.

From time to time, you may be able to visit our website or deal with us anonymously or by pseudonym. However, we require certain personal information to be able to provide you with the services and information you request. If you do not provide us with certain personal information, we may not be able to provide you with access to those services or respond to your request.

## What type of personal information do we collect?

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 documents such as passport or driver’s licence;
- tax file numbers (TFNs) and other identification numbers such as Medicare number;
- date of birth and gender;
- financial information;
- details of superannuation and insurance arrangements;
- sensitive information (with your consent), such as health information or membership details of professional or trade associations or political parties;
- bank account details, shareholdings and details of investments;
- educational qualifications, employment history and salary;
- visa or work permit status; and
- personal information about your spouse and dependants.

## How do we use your personal information?

CountPlus and our associated entities will use the information you supply for the purpose of providing you with the service(s) agreed under our engagement, such as accounting or business advisory services. 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.

## Direct marketing

CountPlus may also use your personal information 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 [unsubscribe@countplus.com.au](mailto:unsubscribe@countplus.com.au); or
- through our contact details set out in the 'Contact us' section of our website and informing us that you wish to unsubscribe.

## How do we disclose your personal information?

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

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

## Access to your personal information

You can request us to provide you with access to personal information we hold about you by sending us an email: [privacy@countplus.com.au](mailto:privacy@countplus.com.au) (no spam please) or writing to us at GPO Box 1453, Sydney, NSW 2001. We may allow an inspection of your personal information in person, or provide copies or a summary of relevant documents, depending on what is the most appropriate in the circumstances. Any charge we make for providing access will be reasonable and will not apply to lodging a request for access.

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

## Accuracy and correction

To enable us to keep our records properly, please notify us if you believe that any information we hold about you is inaccurate, incomplete or out of date and we will take reasonable steps, in the circumstances, to ensure that it is corrected. You can notify us by sending us an e-mail: [privacy@countplus.com.au](mailto:privacy@countplus.com.au) (no spam please) or writing to us at GPO Box 1453, Sydney, NSW 2001.

## Our security procedures

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

However, please be aware that the transmission of data over the Internet is never guaranteed to be completely secure. It is possible that third parties not under the control of CountPlus may be able to access or intercept transmissions or private communications without CountPlus' permission or knowledge. CountPlus takes all reasonable steps, in the circumstances, to protect your personal information. However, we cannot ensure or warrant the security of any information you transmit to us. Such transmissions are done at your own risk.

## Data breach notification

Under the Privacy Amendment (Notifiable Data Breaches) Act 2017 (Cth), CountPlus is required to give notice to 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.

"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.

If you are likely to suffer serious harm from a data breach, we will notify you of:

- the nature of the eligible data breach (ie 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.

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.

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 a breach by another entity;
- if notification would be inconsistent with Commonwealth secrecy laws; or
- where the Commissioner declares that notification does not have to be given.

Depending on the nature of the breach and the harm, we will also consider informing other third parties such as the police or other regulators or professional bodies.

## Identifiers

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

## Links to other sites

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

## Collecting data

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

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

## Changes to our Privacy Policy

This information relates to our current Privacy Policy. From time to time, we may vary this policy for any reason. We will publish any changes on this website. By continuing to use our website and continuing to provide us with your information, you confirm your acceptance of these changes. This Privacy Policy was last amended in March 2014.

## Complaints resolution

CountPlus is committed to providing a fair and responsible system for the handling of complaints from parties whose personal information we hold. If you have any concerns regarding the way we have handled your privacy, please send us an e-mail at [info@countplus.com.au](mailto:info@countplus.com.au) or write to us at GPO Box 1453, Sydney, NSW 2001. We will address any concerns you have through our complaints handling process and we will inform you of the outcome of your complaint within a reasonable timeframe. However, if after receiving 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](http://www.oaic.gov.au).

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

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