

# Privacy Policy

## 1. Our commitment to your privacy

Anthony De Luca Partners Pty Ltd (“we”, “us”, “our” and “De Luca Partners”) is committed to protecting the privacy of your personal information in accordance with the *Privacy Act 1988* (Cth), the Australian Privacy Principles (APPs), our professional obligations and the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (AML/CTF Act).

## 2. What information we collect

The type of personal information we collect and hold depends on the nature of our engagement. We may collect personal and sensitive information including:

- name and contact details such as address, email address, phone and mobile numbers;
- Tax File Numbers;
- gender and date of birth;
- financial, tax and business information;
- bank account or payment information;
- identification information (such as driver’s licence or passport details);
- employment details, employment history and information provided in connection with a job application you submit to us;
- information relating to beneficial ownership of entities and sources of funds; and
- website usage data such as IP address

## 3. How we collect information

Information is collected when you:

- complete our website contact forms;
- engage us for services;
- provide identification or verification documents;
- communicate with us via email, phone, or online meetings;
- use our website, including through cookies and analytics tracking; and
- interact with third-party platforms we use to deliver services.

## 4. Why we collect your information

We collect your information to:

- provide accounting, tax, and advisory services during the usual course of our business activities;
- comply with legal and professional obligations;
- conduct recruitment activities;
- process payments and issue invoices;
- improve our website and service delivery; and
- investigate any complaints.

You have a right not to provide information that can identify you. If, however, you withhold your personal information, it may not be possible for us to provide you with our products and services, or alternatively, it may affect the adequacy or appropriateness of advice or services provided.

## 5. Marketing communications

Occasionally, we might use your personal information to keep you informed about our services and products.

We are committed to safeguarding your privacy and respecting your communication preferences. If there comes a point when you no longer wish to receive marketing communications directly from us, you have the following options:

- use the opt-out link provided within materials related to direct marketing; or
- contact our office via email or phone to opt-out.

## 6. Anti-Money Laundering and Counter-Terrorism Financing

We are also required to comply with the *AML/CTF Act*. This means we may collect, verify and retain personal information to:

- confirm your identity;
- identify beneficial ownership of entities;
- conduct risk assessments; and
- monitor client relationships and transactions.

We may verify your identity using electronic verification services or third-party providers.

We may be required to disclose information to regulatory authorities, including AUSTRAC, without notice to you. In certain circumstances, we may be legally prohibited from informing you that such a disclosure has been made.

## 7. Disclosure of information

We may disclose your personal information to:

- the Australian Taxation Office, other government or regulatory authorities, courts or tribunals where required by law;
- third-party identity verification providers;
- software providers (including cloud accounting platforms);
- professional advisers, auditors, and contractors assisting us; and
- anyone else where you have given consent, such as banks, accountants and other financial institutions.

Some disclosures may be required by law and may occur without notice. Where possible we will advise you of this fact.

## 8. Third-Party services and overseas disclosure

Some service providers we use (including cloud software and identity verification providers) may store or process information overseas. We take reasonable steps to ensure these providers handle your personal information in accordance with Australian privacy laws.

## 9. Personal information of others

You may need to provide us with personal information about other individuals, such as your spouse, dependents, or other family members or employees. If so, we rely on you to have informed those individuals that you are giving their personal information to us, and that you have the necessary authority to do so. You should also advise them about this Policy and how they can obtain a copy.

## 10. Data security

We are committed to ensuring that the information you provide to us is secure. In order to prevent unauthorised access or disclosure, we have put in place suitable physical, electronic and managerial procedures to safeguard and secure information and protect it from misuse, interference, loss and unauthorised access, modification and disclosure.

While we take all reasonable steps to protect your personal information, we cannot guarantee that personal information that we collect will not be disclosed in a manner that is inconsistent with this Policy. In particular, the electronic transmission of personal information by you to us will be at your own risk.

## 11. Data retention

We retain personal information only as long as necessary to fulfil our legal and professional obligations.

## 12. Access and correction

You may request access to your personal information or request corrections by contacting us using the details below.

We will respond within a reasonable time.

## 13. Complaints

If you believe your privacy has been breached, you may contact us using the details below.

If you are not satisfied with our response, you may lodge a complaint with the OAIC at [www.oaic.gov.au](http://www.oaic.gov.au).

## 14. Contact Us

De Luca Partners

Email: [info@delucapartners.com.au](mailto:info@delucapartners.com.au)

Phone: 03 9416 9322

Website: [www.delucapartners.com.au](http://www.delucapartners.com.au)

**Effective Date:** 1st June 2026