Grant Thornton Australia Privacy Policy

Our privacy commitment to you

In this privacy policy we explain how we collect, store, use and disclose personal information and the steps we take to comply with privacy laws. It also explains how you may access and seek correction of the personal information we hold about you and make privacy-related enquiries or complaints. This privacy policy may be updated from time to time if our practices or obligations change.

Application of this privacy policy

This privacy policy applies to personal information we collect about our clients and their nominated contacts and representatives (including trustees, company directors and officers, officers of co-operatives and associations, client's spouse and dependents) and to other individuals whose personal information we collect or that our clients or their representatives provide to us in the course of our services. It also applies to applicants for positions with us and our clients, where we provide our clients with recruitment services.

In this policy 'we' or 'us' means Grant Thornton Australia Limited ABN 41 127 556 389 and its Australian subsidiaries and related entities, and the Grant Thornton Australia Partnership.

We may also provide you with separate privacy notices when we collect your personal information. These notices may outline additional uses and disclosures not detailed in this policy. If there is any inconsistency between these separate privacy notices and this privacy policy, you should rely on the information in those notices.

This policy does not apply to the personal information we collect and hold about our employees.

If you find any links to other websites on our website, this privacy policy does not apply to them. Always check the privacy policy of any website you access.

Types of personal information we may collect about you

We will only ask for personal information that is relevant to our relationship with you and if it is reasonably necessary for one or more of our functions or activities. We may ask you for your:

- Name, address, telephone number, email and other contact details
- Date of birth, gender and marital status
- Financial and investment information including shareholdings, debts or debts owed and bank account details
- Government identifiers including your tax file number
- Superannuation and insurance information

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- Your opinion about our services and our people
- Occupation and employment details including past employment (in respect of job applicants for positions with us or our clients)
- Your sensitive information such as professional memberships, racial or ethnic origin, criminal record and health information (from job applicants or for certain services including recruitment activities for our clients)

How we collect personal information from you and from others

We will usually collect personal information directly from you. For example, we collect personal information directly from you via documents and materials you provide to us, when you complete a form on our website, when you subscribe to one of our publications, respond to one of our surveys, from our conversations with you in person and over the telephone, and from mail and electronic communications with you.

Sometimes we may collect information about you from someone else. For example, from someone acting on your behalf or your representatives (such as financial advisers, accountants, and solicitors), your employer (if they are our client), your insurers or brokers, publicly available sources (such as publications and online profiles), referees, referrers or other intermediaries.

We may also collect personal information about you from our clients in the course of providing services to them. For example, information about you in company records which we are provided in our capacity as a court-appointed liquidator under the Corporations Act 2001 (Cth) (Corporations Act).

When you provide us with someone else's personal information you should only do so with their authority or consent or if you are required or authorised by law. You should also refer them to this privacy policy and any separate privacy notices we provide you.

The purposes for which we collect your personal information

We collect retain, use and disclose your personal information to enable us to provide our services, to respond to your inquiries, assess your employment application and to comply with the law.

Some of the purposes for which we use your personal information are to:

- provide professional services to you or to other clients
- communicate with you, including responding to your inquiries and feedback, keeping you informed of news and events, and sending you industry publications and other material that we think may be of interest to you
- develop and provide system and technology solutions for you
- conduct client satisfaction feedback activities
- conduct administration activities
- manage our conflict of interest and independence obligations
- undertake recruitment activities for us and our clients
- to comply with legislative and regulatory requirements including under the Corporations Act, the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth), and taxation and employment laws
- marketing purposes (see the section below titled ' Marketing our services to you')

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Dealing with us anonymously or using a pseudonym

Due to the types of services we provide it is generally impracticable for people to deal with us anonymously or by using a pseudonym. However, if you prefer, and if practicable and lawful, you can contact us without identifying yourself or you can use a pseudonym such as an email address that doesn't contain your name.

Your election

You may decide not to provide us with your personal information we ask for. However if you do so, or if you provide us with personal information that is inaccurate or incomplete, we may not be able to respond adequately to your inquiries or provide you with the services you or our other clients require.

Our surveys

From time to time we may invite you to participate in surveys or respond to questionnaires regarding your experiences with us, to obtain your feedback or for other reasons that are explained to you. These surveys are voluntary and if you agree to provide us with your information, we will use it for the purpose that is explained to you at the time of obtaining your consent. If those surveys are operated by external third-party providers (for example, Google Consumer Surveys or similar websites), your information may be collected and used by those third parties according to their own privacy policy if you decide to participate in a survey.

When and to whom we may disclose personal information

Depending on the nature of your relationship with us, for the purposes listed in the section above we may provide your personal information to:

- Other Grant Thornton member firms, Grant Thornton International Ltd., and the Grant Thornton Partnership, including their employees
- Our professional advisers and specialist consultants
- Brokers and agents who refer your business to us
- Any person acting on your behalf, such as your financial advisor, solicitor, settlement agent or administrator
- Insurers
- Vendors and other third parties who provide services to us, including data processing, audit and quality review activities, and market research
- Agents who assist us to dispose of property or equipment
- Investors, advisers, and trustees
- Professional associations and organisations
- Industry regulators, government agencies or courts and tribunals
- Your referees (to confirm details about you as part of recruitment activities)

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Overseas disclosures

The entities described above to whom we may disclose your personal information may be located overseas, including in Brazil, Canada, India, Ireland, Japan, Malaysia, Netherlands, New Zealand, Philippines, Poland, Singapore, South Africa, United Kingdom and United States. We will take reasonable steps to ensure that these overseas recipients maintain the same high standards of protection of your personal information that we do, and that they comply with the requirements of the Australian Privacy Principles.

- The Grant Thornton member firms to whom we may disclose your personal information (to assist us in providing services to you) are located in the Americas, Europe, the Middle East, Africa, and the Asia Pacific region. For a current list of Grant Thornton member firm locations please use this link or copy and paste it into your browser: http://www.grantthornton.global/locations

Disclosure required by law

We may be required to disclose your personal information by law e.g. under Court Orders or Statutory Notices, or under laws relating to sanctions, anti-money laundering or counter terrorism financing, corporations law, taxation and employment or where we are appointed to administer companies under the Corporations Act.

Marketing our services to you

From time to time we may also use and disclose your personal information to inform you about other services and products we provide or that other companies offer which we think may be of interest to you.

If at any time you do not wish to receive direct marketing communications from us you may:

- use the opt-out link provided on direct marketing related material, or
- contact our Marketing team at newsletters@au.gt.com, or
- telephone your local Grant Thornton office

Accessing and correcting your personal information

We take reasonable steps to make sure that your personal information is accurate, complete and up-to-date. You may request access to and correction of your personal information by contacting your local Grant Thornton office by phone or in writing. We will need to verify your identity to deal with your request and we will endeavour to deal with your request within a reasonable timeframe. In some circumstances we may not be able to give you access to all of the personal information we hold about you, as authorised under the Australian Privacy Principles.

If you request us to correct or update any personal information that we hold about you, for example if you think it is inaccurate, incomplete, or out of date we will take all reasonable steps to correct the information. If we decide not to correct the information, you can ask us to include with the information a statement that the information is not correct.

If we cannot grant you access to your personal information, or we cannot agree as to correct it, we will confirm our reasons in writing, unless it would be unreasonable to do so. If you do not agree with our decision you may ask us to review the decision via our complaint handling procedures which we will explain to you.

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How we handle complaints

If you believe we have not complied with our privacy obligations you can submit a complaint to us in writing by either of the following methods:

- Emailing the Privacy Officer at privacy.officer@au.gt.com
- Mailing the Privacy Officer at PO Locked Bag Q800, QVB Post Office, Sydney NSW 1230

We will respond to your complaint as soon as reasonably practicable after receipt of your written complaint. We will need to verify your identity and we may need to ask you for further information. If you do not agree with our decision or the way we have handled your complaint you can refer your complaint to the Office of the Australian Information Commissioner.

How we store your personal information

We hold personal information in both electronic and hardcopy formats. We will take reasonable steps to protect the security of personal information. We have document management and retention policies and processes in place, and we employ physical controls such as swipe card access to our buildings and locked filing units. Our electronic records are protected by a range of security measures, for example, firewalls, passwords, virus scanning software, and data encryption.

Cookies

“Cookies” are data files (of letters and numbers) that we store within your browser and the hard drive of your computer, if you to agree to us doing so, when you interact with our website. These data files allow us to recall important information about your visit to our website and help to improve your experience if you return.

When you visit our website, our servers collect your log information such as the pages visited, the date and time of your visit, your web browser (e.g. Internet Explorer or Safari) and device type and the IP address associated with your request. We also collect referring and onward URLs of websites you have visited or will visit; data about the activities you undertake and how you interact with us online, such as what data is displayed, clicked on or shared by you, the click stream patterns, and the length of time you spend on our site or page. We use this information to help us manage and improve our website and for tracking and marketing purposes.

We use cookies to:

- enhance your access to and the functionality of our website and user experience - we are able to make it easier for visitors to register for accounts
- show you ads on other websites and social media platforms based on your interests or browsing history
- highlight specific content that you may be interested in based on your previous visits

The types of cookies we use are:

Required

- *Strictly necessary cookies:* these are cookies that are required for the operation of our website. Without them, for example, you would not be able to register with us or log in to your account

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Functional

- *Analytical/performance cookies*: these cookies allow us to recognize and count the number of visitors and to see how visitors move around our websites. These helps us to improve the way our website works, for example, by ensuring that users are finding what they are looking for easily and do not encounter technical errors.
- *Functionality cookies:* these are used to recognize you when you return to our website. Use of these cookies enables us to personalize our content for you and remember your preferences, highlighting relevant content based on the pages you have visited on our website (for example, a cookie can be used to pre populate forms to present relevant information to you based on your interests).

Advertising

- *Targeting cookies:* these cookies record your visit to our website, the pages you have visited and the links you have followed. Use of these cookies of this character helps us and our Ad partners to deliver ads or messages that are relevant to you and your interests. We may also share this information with third parties for this purpose.
- *Interaction cookies:* these cookies allow us to communicate. For example, these cookies allow you to “like” us or recommend us on social media. These social media interaction cookies may collect information about your visit even though you do not interact with the

Third party analytics and advertising

We may allow third parties to use cookies and other technologies in order to advertise our services on other websites and social media platforms. We allow third party cookies from Google to inform, report, optimise and serve ads based on your visits to other websites.

Web beacons

Our website and other communications including emails contain electronic images called “web beacons” (they are also known as one pixel GIFs, clear GIFs or pixel tags). Web beacons allow us to count visitors who have viewed content on websites or pages or which subscribers have read our emails. We can then develop statistical information about the activities and features that most interest you and then provide more personalized content. We do not use web beacons to access your personal information without your consent.

Opting out of cookies and online advertising

If you do not wish to accept our use of cookies you can disable some or all of them by setting your browser preferences. However, this will impact on your experience of and access to our website. You can visit www.aboutcookies.org to find out more about cookies.

You can stop the delivery of ads we or others place online using interest-based information.

For more information or how to opt out of third party cookie data collection from Google, go to https://policies.google.com/privacy

When you opt-out using these methods, a cookie will be placed on your device indicating that you have opted-out of interest-based advertising. If you delete your cookies, you will need to opt-out again. In addition, when you opt-out using these methods, this does not mean that you will no longer receive advertising from us or others when you use the Internet. It simply means that the advertising you see displayed on websites will not be customized to your interests.

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Our retention and destruction practices

We retain your personal information while there is a legal or a business need for us to do so. When we no longer require your personal information we will take reasonable steps to destroy it.

How to contact us

You can contact us about this policy by:

- Telephoning your local Grant Thornton office and asking to speak to the Privacy Officer or the National Managing Partner – Quality & Excellence
- Emailing the Privacy Officer at privacy.officer@au.gt.com
- Mailing the Privacy Officer at PO Locked Bag Q800, QVB Post Office, Sydney NSW 1230

Updates to this policy

We will update this policy as required to reflect changes to our privacy practices. We encourage you to check our website regularly for updates to our Privacy Policy.

This policy was updated November, 2026.

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