The Institute of Public Accountants ABN 81 004 130 643
Privacy Policy

1 About this privacy policy

This document sets out the policy of The Institute of Public Accountants ABN 81 004 130 643 (**IPA**) relating to the privacy of your personal information (**Privacy Policy**).

IPA is committed to protecting the privacy of the personal information it collects and receives. IPA is bound by the Australian Privacy Principles (**APP**) contained in the Privacy Act 1988 (Cth).

This Privacy Policy applies to all your dealings with the IPA whether at one of IPA's division offices, through IPA call centres, via the IPA's websites or with an IPA advisor.

This Privacy Policy seeks to explain how IPA collect, uses, disclose and manage personal information.

- the kinds of personal information that IPA collects and holds;
- how IPA collects and holds your personal information;
- why the IPA collects, holds, uses, and discloses your personal information;
- how you may access and seek the correction of your personal information as held by IPA;
- how you may complain about a breach of the APPs or a registered APP code (if any) that IPA are bound by, and how IPA will deal with such a complaint; and
- if IPA is likely to disclose your personal information to overseas recipients and the countries in which such recipients are likely to be located (if it is practicable to specify those countries in this policy).

You accept this Privacy Policy and expressly consent to IPA's collection, use and disclosure of your personal information as described in this Privacy Policy by using the IPA websites (https://www.publicaccountants.org.au or https://publicaccountant.com.au) and participating in CPD programs, subscribing to IPA publications or registering as a member or student to the IPA.

2 Your Personal Information

IPA only collects personal information (being information that identifies or could reasonably identify an individual) where IPA considers it to be reasonably necessary for IPA functions and activities.

IPA collects personal information to service the needs of its members and to carry out its professional association duties including in circumstances when:

- you apply or are registered as a member or student;
- IPA processes subscription renewal forms;
- enrolling in CPD, courses or using IPA services;
- collecting member survey form information;
- recording complaints against members;
- participate in a poll or survey;
- facilitating use of IPA services;
- addressing enquiries or requests for information about IPA; and/or
- you initiate contact with the IPA to use the "Find an accountant" service on the IPA website, and you consent to your personal information being included on the directory listings; which enable the public to search for IPA members to connect with you using search criteria suburb, postcode, and services required.

The types of information IPA collects includes:

- name, age, gender, and address details;
- educational qualifications, and professional designations;
- work history, current employment, and position;
- contact details (including phone, fax, and e-mail);
- practice locations and areas of expertise (Find an accountant);
- views and opinions; and
- responses to forms and surveys (if any).

3 Your Sensitive Information

'Sensitive information' is defined in the *Privacy Act 1988* (Cth) and includes information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

IPA will only collect your sensitive information where it is reasonably necessary for one or more of IPA's functions or activities and either you have consented, or IPA is required or authorised under law to do so.

4 How IPA collects your personal information

IPA will solicit your personal information by lawful and fair means directly from you unless it is unreasonable or impracticable to do so. IPA will collect personal information directly:

- by email;
- over the telephone;
- by written correspondence (such as letters, faxes);
- on hard copy forms (including registration forms, competition entry forms, and surveys);
- AI enabled tools such as a website chatbot when used;
- in person (at job interviews, exams, or seminars); or
- through the IPA website (online purchases, subscription to newsletters, web form submission, online polls, and surveys, "Find an accountant" or participate in a live chat);
- at seminars and functions (if you fill out an assessment form or leave your business card);
- during exams or assignments for IPA programs;
- electronic systems such as applications; and
- through IPA security surveillance cameras.

IPA may collect your personal information from third parties including:

- educational providers that assist IPA programs;
- direct marketing database providers;
- the Australian Tax Office (**ATO**);
- the Australian Securities and Investment Commission (**ASIC**);
- professional indemnity insurance providers; and
- public sources (phone directories, membership lists, professional and trade associations, ASIC, bankruptcy, or court registry searches).

5 Unsolicited personal information

Unsolicited personal information is personal information IPA receives that IPA has taken no active steps to collect (such as a job application sent to IPA by an individual on their own initiative, rather than in response to an advertisement).

IPA may keep records of unsolicited personal information if the information is for one or more of IPA functions or activities. If not, it is IPA policy to destroy the unsolicited information or ensure that the information is de-identified, provided it is lawful and reasonable to do so.

6 Using your personal information

The main purposes for which IPA collects, holds, uses, and discloses personal information are to provide services and benefits to members, and to maintain, extend and grow IPA's membership. IPA collects information to service your professional requirements. The IPA can use your information to:

- process applications for memberships;
- send and processing subscription renewals;
- inform members of services offered by the IPA;
- understand IPA members' needs and requirements;
- provide information for professional development and delivering articles, videos, and blogs;
- lobby government;
- manage and run the IPA website;
- providing you with information about IPA services including CPD programs;
- delivering or enhancing IPA services;
- help IPA maximise the benefits IPA provides to members or to assist the IPA in complying with its organisational object, charter, or mandate;
- maintain contact with you about IPA services;
- report back to you about IPA work or encourage you to learn about what the IPA does; and
- any other purpose related to IPA work and for which you have provided consent (where it is reasonably required by law).

Find an accountant

In relation to the "Find an accountant" service, IPA collects, holds, and uses only the necessary information provided by members to:

- enable public users to search for and identify relevant IPA members. Location data such as suburbs or postcodes will be used to provide relevant search results;
- display member profiles within a public directory.
- connect members with those who may need their services. IPA does not endorse or guarantee any members' services on the automated search results and those listed on the directory;
- maintain, analyse, and improve the functionality and effectiveness of the service. IPA may use aggregated and de-identified information for analytics, maintenance, and improvement to the service.

The IPA website requires subscriptions or registrations to use certain services, functions, or content. You will know what information is being collected via these processes when you complete the relevant forms and provide the required details prior to submitting the application.

IPA will collect data relating to any transactions you carry out through the IPA website and the fulfilment of your order. IPA may also use your data to monitor for any unauthorised use of the IPA's website, content, or subscriptions to IPA's services.

Use of artificial intelligence (AI)

IPA may use artificial intelligence (AI) technologies to support our operations and improve services. Where AI processes personal information, we ensure it is used only for authorised and lawful purposes, subject to suitable human oversight, and protected by appropriate security controls.

IPA do not use personal information to train AI systems without appropriate authorisation and only if permitted by applicable laws.

IPA may use AI technology to assist in processing information, but only for purposes consistent with the original reason for collection.

The chatbot on IPA's website is designed to process minimal amounts of personal information reasonably necessary to assist users and to support IPA functions and activities. Users should avoid providing sensitive or personally identifiable information (PII). Chatbot interactions may be recorded and retained in chat logs for service delivery, quality assurance, security, and compliance purposes.

Information collected through the chatbot, and other AI technologies may be used by providers to improve the services and systems. Where information is used for these purposes, IPA will take reasonable steps and wherever practical to ensure the external providers aggregate, de-identify, or anonymise the data before it is analysed or used for service improvement.

7 Purpose of collection

If IPA collects personal information for a purpose (the primary purpose), IPA will not use or disclose the information for any other purpose (the secondary purpose) unless:

- you would have consented to the use or disclosure of your personal information; or
- in relation to the use or disclosure of your personal information:
  - you would reasonably expect IPA to use or disclose your information for the secondary purpose, and the secondary purpose is directly related to the primary purpose (sensitive information) or related to the primary purpose (not sensitive information);
  - use or disclosure is required or authorised under Australian law or a court/tribunal;
  - a 'permitted general situation' or 'permitted health situation' (as defined in the *Privacy Act 1988* (Cth)) exists in relation to IPA's use or disclosure of the information; or
  - IPA reasonably believes that the use or disclosure of the information is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body.
- if IPA uses or discloses your personal information because IPA reasonably believes that the use or disclosure of your information is reasonably necessary

for one or more enforcement related activities conducted by, or on behalf of, an enforcement body, IPA will make a written note of the use or disclosure.

8 Do you have to provide personal information

You can refuse to provide personal information. However, a refusal may mean that the service you requested is not provided or membership will be refused or forfeited.

9 Sharing your personal information

IPA may use and disclose personal information for related purposes to third parties. Types of organisations to whom IPA may disclose your personal information includes:

- government bodies such as ATO, ASIC, Australian Prudential Regulatory Authority and the police or courts (as required by law);
- professional or government organisations; and
- IPA's contracted service providers include:
  - information technology service providers;
  - planning research and development providers;
  - publishers of IPA's newsletters, student handbooks, and course material;
  - conference organisers;
  - marketing and communications agencies, and printers and distributors of marketing material (provided that the requirements of Sections 13 & 14 of this Privacy Policy are met);
  - call centres and call training centers;
  - mailing houses, freight, and courier services; and
  - external advisers (such as recruiters, auditors & lawyers).

IPA does not provide, rent, sell, or exchange your personal information to third parties without your prior approval (unless authorised or required by law).

10 Government Identifiers

IPA does not adopt, use, or disclose government related identifiers as IPA's own identifier for you unless:

- it is required/authorised by law or court/tribunal order;
- it is reasonably necessary for IPA to verify your identity;
- it is reasonably necessary to fulfil IPA's obligations to an agency or a State or Territory authority; or
- IPA believes it is reasonably necessary for one or more enforcement related activities conducted by, or on behalf of, an enforcement body; or
- the adoption, use or disclosure is otherwise permitted by law.

11 Cookies

To improve IPA's services, IPA sometimes collects de-identified information from web users. Although the information collected does not identify an individual, it does provide IPA with useful statistics that permit IPA to analyse and improve its web services. When you visit the IPA website, a record of your visit is logged, and the following data is supplied by your browser:

- your IP address and/or domain name;
- your operating system (type of browser & platform);
- the date, time, and length of your visit; and
- the resources you accessed or downloaded.

IPA uses this information to customise services for website visitors and to collect aggregated data for the purposes of analysis, quality control, administering and improving the website. It is not used for any other purpose. Aggregated data may be shared with third parties.

12 Links to other websites

Links to third party websites that IPA does not operate, or control are provided for your convenience. IPA is not responsible for privacy practices of websites not covered by this Privacy Policy. Third party websites should have their own privacy and security policies which IPA encourages you to read before supplying any information to them.

13 Direct Marketing

If IPA holds your personal information, IPA may use or disclose that personal information (other than sensitive information) for direct marketing if:

- IPA collected the information from you; and
- you would reasonably expect IPA to use or disclose the information for that purpose; and
- IPA provided you with a simple way to opt out of receiving direct marketing from IPA; and
- you have not made such an opt out request to IPA

IPA may also use or disclose your information (other than sensitive information) for direct marketing if:

- IPA collected the information from you, and you would not reasonably expect IPA to use or disclose the information for that purpose or someone other than you; and
- either:
  - you have consented to the use or disclosure of the information for that purpose; or
  - it is impracticable to obtain that consent; and
- IPA provides you with a simple way to opt out of receiving direct marketing from IPA; and
  - in each direct marketing communication with you:
  - IPA includes a prominent statement that you can request to opt out; or
  - IPA otherwise draw your attention to the fact that you can request to opt out; and
  - you have not made such a request to IPA.

IPA can use or disclose your sensitive information for the purpose of direct marketing if you have consented to the use or disclosure of that information for direct marketing.

IPA may also use or disclose your personal information for direct marketing if:

- IPA are a contracted service provider for a Commonwealth contract; and
- IPA collected your information in order to meet an obligation under that contract; and
- the use or disclosure is necessary to meet (directly or indirectly) such an obligation.

If IPA has collected the personal information that IPA used to send you direct marketing material from a third party, you can ask IPA to notify you of its source of information. It is IPA's policy is to do so unless it is unreasonable or impracticable.

14 How to opt out of direct marketing

If IPA uses or discloses your personal information for the purpose of direct marketing, you may request not to receive direct marketing communications from IPA.

If IPA uses or discloses your personal information for the purpose of facilitating direct marketing by other organisations, you may request that the IPA does not use or disclose your information for this purpose.

IPA will give effect to your request not to receive direct marketing from IPA or an entity facilitated by IPA free of charge within a reasonable time after the request is made.

15 Collection Notices

At or before the time of collection of personal information from you, or as soon as practicable afterwards, IPA will take reasonable steps to notify you or to otherwise ensure that you are aware of:

- IPA's contact details;
- the fact that IPA collects, or has collected, your personal information and the circumstances of that collection (if collected from someone other than you);
- Where AI technologies are used to collect or process your personal information;

If the collection is required or authorised by law or a court/tribunal order;

- why IPA collected the personal information;
- the consequences to you if IPA does not collect all or some of your personal information;
- any other entity, body or person, or the types of any other entities, bodies, or persons, to which IPA usually disclose personal information;
- if IPA is likely to disclose your personal information to overseas recipients and if so, the countries in which such recipients are likely to be located (if it is practicable to specify those countries or to otherwise make the individual aware of them); and
- this privacy policy and that it explains how:
    - you may access personal information held by IPA and seek the correction of the information;
    - you may complain about a breach of the APP, or a registered APP code (if any) that IPA is bound by & how IPA will deal with a complaint.

IPA will generally include these matters in a collection notice, which may include a reference to this Privacy Policy where the Privacy Policy addresses the above requirements in the circumstances of the collection.

Collection notices may provide more specific information than this Privacy Policy in relation to particular collections of personal information. The terms of this Privacy Policy are subject to any specific provisions contained in collection notices and in terms and conditions of particular offers, products, and services. IPA encourages you to read those provisions carefully.

16 Protecting your personal information

IPA stores information in different ways, including paper and electronic form and where AI systems are used. IPA takes reasonable steps to protect it from misuse, interference, loss, unauthorised access, unauthorised modification, and unauthorised disclosure. Depending on the information, these steps may include:

- secure password protected databases for storage;
- confidentiality requirements of staff;
- security measures for access to IPA's systems including firewalls;
- servers kept at a secure location with limited access;
- document storage security requirements;
- access granted only those verified to receive personal information;
- security monitoring and data protection safeguards;
- access controls for IPA's building;
- limited the provision of personal information to third parties and subject to guarantees about use; and
- IPA's staff are trained to deal with the information.

IPA takes reasonable steps to ensure directory information on the "Find an accountant" service on the IPA website is accurate and secure, and implements controls to prevent misuse, loss, or unauthorised access.

IPA cannot guarantee that personal information will be protected against unauthorised access or misuse, and IPA does not accept any liability for the improper actions of unauthorised third parties.

IPA will retain your personal information for as long as necessary to fulfil IPA's obligations to you, to protect IPA's legal interests, to comply with an Australian law or as otherwise stated to you when IPA collected your personal information.

Once IPA is no longer required to retain your personal information, IPA will take reasonable steps to destroy your personal information or to ensure that your personal information is de-identified.

17 Disclosing your personal information overseas

IPA may disclose your personal information to third party service providers operating outside Australia who work with IPA or one of IPA's suppliers, agents, or partners. IPA may also store your personal information on servers based overseas or in the "cloud" or other types of networked or electronic storage.

Before disclosing your personal information to an overseas third party, IPA will first take reasonable steps to ensure that:

- the recipient of the information does not breach the APPs in relation to your personal information;
- the recipient of the information is subject to a law, or binding scheme, which has the effect of protecting your personal information in a way that, overall, is at least substantially similar to the way in which the APPs protect the information and there are mechanisms you can access to take action to enforce that protection of the law or binding scheme; or

- the disclosure is otherwise permitted by law.

To make it easy for you to deal with IPA and provide you with a more personal and consistent experience, IPA may exchange and combine personal information with related entities for the purposes described in this Privacy Policy.

When members opt in to join the IPA Group Benevolent Fund ("the Fund") on their membership invoices or on any medium, the IPA has to disclose some individual personal data to **the Fund.** This is to enable the Fund to process the membership and to provide the required information to the member. Any information sent to the Fund is limited to only data that is necessary to administer the membership with the Fund.

When sharing personal details with the Fund, IPA takes reasonable steps to protect personal information from misuse, interference, loss, unauthorised access, unauthorised modification, unauthorised disclosure, limit the provision of personal information and subject to guarantees on the data usage and compliance with the Australian Privacy Principles.

The Fund is a Registered Charitable Incorporated Organisation (Charity Registration No.1202088) managed by an Independent Board of Trustees and registered in the United Kingdom. An IPA member who opts in with an amount AUD20.00 or more to the Fund will become a member of the IPA Group Benevolent Fund. Members are

encouraged to find out more about the IPA Group Benevolent Fund and the benefits of being a member by following this link. (Membership – IPA Group Benevolent Fund. (ifa-ipa-benevolentfund.co.uk)

Some AI service providers may store or process personal information overseas. IPA take reasonable steps to ensure such providers comply with Australia privacy requirements as described above.

18 Anonymity

You have the option of not identifying yourself or using a pseudonym when dealing with IPA provided that it is lawful and practicable.

IPA will try to accommodate a request for anonymity if possible. However, your right to anonymity does not apply in relation to a matter if:

- IPA is required or authorised by or by law or a court/tribunal order to deal with individuals who have identified themselves; or
- it is impracticable for IPA to deal with individuals who have not identified themselves.

It is IPA's policy to enable you to access IPA's website and make general queries without having to identify yourself and to enable you to respond to IPA's surveys anonymously.

In some cases, however, if you do not provide IPA with your information when requested, IPA may not be able to respond to your request or provide you with a service. For example, you must identify yourself to become a member or to sit an exam for IPA's programs.

19 Accessing your personal information

You have the right, upon request, to access any of IPA's records containing your personal information, unless an exception applies as described below.

To request access to your information please contact IPA's privacy officer. IPA will respond to your request to access your information within a reasonable period of time.

IPA will give you access to the information in the manner you request if it is reasonable and practicable to do so.

If IPA refuses your request to access personal information, IPA will provide a written notice setting out the reasons for the refusal & how you can complain about the refusal. IPA may refuse to provide access to personal information to the extent that:

- IPA reasonably believes that giving access would pose a serious threat to the life, health, or safety of any individual, or to public health or public safety;
- giving access would have an unreasonable impact on the privacy of other individuals;
- the request for access is frivolous or vexatious;
- giving access would be unlawful;
- denying access is required or authorised by law or court/tribunal order; or
- another ground of refusal applies as set out in Australian Privacy Principle 12.3, which may include grounds relating to unlawful activity, law enforcement activities, legal proceedings, negotiations, and commercially sensitive decision-making processes.

When you make a request to access personal information, IPA will require you to provide some form of identification (such as a driver's license or passport) so IPA can verify that you are the person to whom the information relates.

20 Help IPA keep your personal information accurate

IPA will take reasonable steps to ensure IPA's records of personal information are, having regard to the purpose for which it is held, accurate, up to date, complete, relevant, and not misleading.

The accuracy of information depends to a considerable extent on the information you provide. If you do not give IPA all the information IPA may require, or the information provided is inaccurate or incomplete, then the products, services and information IPA provide may be affected.

If you think there is something wrong with the information IPA holds about you, please contact IPA's privacy officer:

- to let IPA know if there are any errors; and
- keep IPA up to date with any changes,

and IPA will try to correct your personal information.

Members may access, update, correct or request removal of their "Find an accountant" directory listing at any time. Participation in the directory is voluntary.

IPA will respond to your request to correct your information free of charge and in a reasonable period of time. If IPA refuses, IPA will give you a written notice setting out the:

- reasons for the refusal (except to the extent that it would be unreasonable to do so); and
- mechanisms available to complain about the refusal.

If IPA refuses to correct your information, you may request that IPA associate your information with a statement that the information is inaccurate, out of date, incomplete, irrelevant, or misleading. IPA will take reasonable steps to make the statement visible to users of your personal information.

If IPA does correct your personal information and IPA has previously disclosed your personal information to a third party, upon your request, IPA will notify that third party of the correction unless it is impracticable or unlawful to do so.

Where AI systems are used, we implement processes to ensure outputs are reviewed and personal information remains accurate. You may request access to or correction of personal information, including personal information processed by AI systems where applicable.

21 Dealing with SPAM and Do Not Call Register

IPA will not send you any commercial electronic messages unless the Spam Act permits it. Any commercial electronic message that IPA sends will identify IPA as the sender and will include relevant contact details and an unsubscribe facility.

IPA will not call you on a number listed on the Do Not Call Register unless it is permitted under the Do Not Call Register Act and related instruments.

If you do not wish to receive commercial electronic messages from IPA or do not wish IPA to call you on a particular number, please contact the privacy officer.

22 Resolving your privacy issues

If you have any issues you wish to discuss with IPA or if you are concerned about how IPA has collected or managed your personal information, please contact the privacy officer.

For information about privacy or if your concerns are not resolved to your satisfaction, you may contact the Office of the Australian Information Commissioner at www.oaic.gov.au and on 1300 363 992.

23 Changes to this privacy policy

IPA may, from time to time, review and update this privacy policy to take account of new laws and changes to IPA's operations. Changes to this Privacy Policy will not affect IPA's use of previously provided information.

24 How to access this privacy policy

A copy of this Privacy Policy is available on the IPA websites. A printed copy of the privacy policy can be obtained free of charge by contacting IPA's Privacy Officer.

25 IPA privacy officer

IPA's privacy officer can be contacted at:

- Email: privacy@publicaccountants.org.au.
- Telephone: 03 8665 3100
- Fax: 03 8665 3130
- Post: GPO Box 1637, Melbourne VIC 3001.

Last Updated: 07 August 2026