

# Privacy Policy

XTAS Pty Ltd (ABN 70 658 202 414), trading as XTAS Partners  
Last updated: 15th September 2026

XTAS Pty Ltd (ABN 70 658 202 414), trading as XTAS Partners ("XTAS Partners", "we", "us" or "our"), handles personal information in accordance with the Australian Privacy Principles (APPs) in the *Privacy Act 1988* (Cth) ("Privacy Act").

As a registered tax agent and a Chartered Accountants ANZ practice, we are also bound by the confidentiality obligations in the *Tax Agent Services Act 2009* (Cth) Code of Professional Conduct and APES 110 *Code of Ethics for Professional Accountants*.

This Privacy Policy explains how XTAS Partners collects, uses, discloses, stores and protects your personal information. It applies to everyone who deals with us, including clients, prospective clients, contractors, employees, suppliers and visitors to our website, [www.xtas.com.au](http://www.xtas.com.au) (the "Site").

We may update this Privacy Policy from time to time to reflect changes in our practices or the law. The current version is always available on our Site.

### **1. Types of personal information we collect**

What we collect depends on the services we provide and how you deal with us. It generally includes:

- Name, date of birth, residential and postal address, phone number, email address and messaging app contact details (such as WeChat)
- Identity documents, such as a passport, driver's licence or Medicare card, and beneficial ownership and source-of-funds information collected for customer due diligence
- Employment details and occupation
- Bank account, superannuation and investment details
- Tax File Numbers (TFNs) and other tax-related information
- Business records, financial statements and other accounting information
- Sensitive information (such as health information or professional memberships) only where it is needed for our services and you consent, or where the Privacy Act otherwise permits it

### **2. How we collect personal information**

We usually collect personal information directly from you, including in meetings (in person or via Microsoft Teams or Zoom), by phone, email or messaging apps, through our secure client portal, and through forms on our Site.

We may also collect personal information from third parties, including:

- Your authorised representatives, such as a financial adviser, lawyer or mortgage broker
- Businesses, trusts or superannuation funds you are associated with
- Government agencies and regulators, including the Australian Taxation Office (ATO) and the Australian Securities and Investments Commission (ASIC)
- Publicly available sources
- Identity verification services, sanctions screening databases and regulatory data sources (including the DFAT Consolidated List and United Nations Security Council sanctions lists), where needed to meet our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) ("AML/CTF Act") and our AML/CTF Program

If you give us personal information about another person, such as a family member, director or beneficiary, you must have their authority to do so and should refer them to this Privacy Policy.

### **3. Meeting notes, recordings and technology tools**

We do not record meetings by default. Where we would like to record a meeting or use a transcription tool (such as Microsoft Teams) to help with accurate note-taking, we will tell you beforehand and you may decline.

Recordings and transcripts are for internal use only and are never used for marketing. They are stored securely and deleted or de-identified once they are no longer needed.

We use software tools, which may include AI-assisted tools, to help prepare our work. All advice and lodgements are reviewed by our qualified staff, and we do not make decisions that significantly affect you using automated means alone.

#### **4. How we use personal information**

We collect, hold and use personal information where reasonably necessary for our business functions, including to:

- Provide tax, accounting and advisory services under our engagement with you
- Verify your identity and carry out customer due diligence and ongoing monitoring under the AML/CTF Act
- Respond to enquiries and service requests
- Communicate with you, including sending client updates and newsletters
- Meet our legal, regulatory and professional obligations
- Run our internal operations, including recruitment and staff administration
- Manage our contractors and service providers

We collect, use and disclose TFNs only as permitted by taxation, superannuation and personal assistance law, and in line with the *Privacy (Tax File Number) Rule 2015*.

With your consent, or where the law otherwise allows, we may send you information about our services, updates and events. You can opt out at any time by using the unsubscribe link or contacting us.

If you choose not to provide information we request, we may be unable to provide the relevant service or continue the engagement.

#### **5. Disclosure of personal information**

We may disclose personal information where reasonably necessary for the purposes above, or where required or authorised by law, to:

- Our staff and contractors
- Government agencies, including the ATO and ASIC, when lodging and managing your affairs
- Professional advisers and service providers acting for you or for us, such as lawyers, financial advisers and independent SMSF auditors
- Cloud software and IT providers we use to deliver our services, such as Microsoft 365, our document management and client portal provider, accounting and practice management software, and our email newsletter platform
- Our AML/CTF transaction monitoring partner, where you have engaged us for that service
- The Australian Transaction Reports and Analysis Centre (AUSTRAC), the Australian Federal Police, the Australian Sanctions Office and other regulators or law enforcement bodies, where the AML/CTF Act or other laws require us to report. In some cases the law prohibits us from telling you that a report has been made

We do not sell or trade personal information, and we do not disclose it to third parties for their own marketing. We may use aggregated or de-identified information that does not identify you.

#### **6. Overseas disclosure**

Some of our cloud service providers may store or process personal information outside Australia, including in the United States. Before disclosing information overseas, we take reasonable steps

to ensure the recipient handles it consistently with the APPs or is subject to laws substantially similar to the Privacy Act.

We do not outsource the preparation of tax returns or other tax work to anyone overseas.

## **7. Data security and retention**

We take reasonable steps to protect personal information from misuse, interference, loss, and unauthorised access, modification or disclosure. Our measures include:

- Secure office premises and document storage
- Password-protected, encrypted systems with multi-factor authentication
- A secure client portal for exchanging documents, in place of email attachments where practical
- Role-based access controls and internal data-handling policies

If a data breach is likely to result in serious harm to you, we will notify you and the Office of the Australian Information Commissioner (OAIC) under the Notifiable Data Breaches scheme.

We keep personal information only for as long as it is needed for the purposes above or as required by law, then securely destroy or de-identify it. Records we must keep under the AML/CTF Act are held for at least seven years after our relationship with you ends, and tax records are kept for the periods required by taxation law.

## **8. Access and correction**

You may ask, in writing, to access or correct the personal information we hold about you. We will verify your identity and respond within 30 days.

We do not charge for making a request, but may charge a reasonable fee for providing access to extensive records. If we refuse access or correction, we will explain why in writing, unless the law prevents us from doing so (for example, where AML/CTF reporting is involved).

## **9. Cookies and third-party links**

Our Site may use cookies and analytics tools to improve functionality and understand how visitors use it. Cookies do not by themselves identify you, and you can disable them in your browser settings, although some Site features may then not work properly.

Our Site and communications may link to third-party websites and platforms, including social media. Those sites are not covered by this Privacy Policy, and we are not responsible for their content or privacy practices.

## **10. Complaints**

If you have a concern about how we have handled your personal information, please contact us in writing. We will investigate and respond within 30 days.

If you are not satisfied with our response, you may complain to the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or on 1300 363 992.

## **Contact us**

### **XTAS Partners**

Level 17, 400 George Street, Sydney NSW 2000

PO Box 771, Sydney NSW 2001

Phone: 02 7235 0040

Email: [admin@xtas.com.au](mailto:admin@xtas.com.au)

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