

# Headstart Finances Australia Pty Ltd

ABN: 88 656 265 860 | 11 York Street, Sydney, NSW 2000, Australia

Email: info@hsfinances.com.au

## Privacy and Security Policy

Effective Date: 15 June 2026

### 1. Our Commitment to Privacy

Headstart Finances Australia Pty Ltd is committed to protecting the privacy and security of your personal and business information. This policy outlines how we collect, use, store, and disclose information in compliance with the Australian Privacy Act 1988 (Cth) and the Australian Privacy Principles (APPs).

### 2. Information We Collect

We may collect the following categories of information:

Personal Information: Name, address, date of birth, email, phone number, ABN/ACN.

Financial Information: Bank account details, tax file numbers (where authorised), transaction records, BAS data, payroll records, and financial statements.

Business Information: Entity structure, industry classification, employee details, and supplier/customer records.

Technical Information: IP addresses, browser type, device identifiers, and usage logs when you interact with our software products (Accfino, LinkLens, HSPayroll).

### 3. How We Use Your Information

We use collected information to:

- Deliver contracted accounting, financial advisory, and technology services.
- Comply with ATO lodgement obligations (BAS, STP, PAYG, Superannuation).
- Improve and develop our software products.
- Communicate with you about your account, services, and relevant updates.
- Fulfil our legal and regulatory obligations.
- Conduct fraud detection and risk management.

We do not sell your personal information to third parties.

### 4. Disclosure of Information

We may share your information with:

- The Australian Taxation Office (ATO) as required by law.
- Our authorised service partners and cloud infrastructure providers bound by confidentiality agreements.
- Professional advisers (legal, audit) under strict confidentiality.
- Government agencies where required by law.

# Headstart Finances Australia Pty Ltd

ABN: 88 656 265 860 | 11 York Street, Sydney, NSW 2000, Australia

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

---

All third-party processors are contractually required to handle your data in accordance with Australian privacy law.

## 5. Data Storage and Security

---

All client data is stored securely within Australian jurisdiction. Our Accfino platform maintains AU data residency at all times.

Security measures include:

- AES-256 encryption for data at rest.
- TLS 1.3 encryption for data in transit.
- Multi-factor authentication (MFA) on all production systems.
- Regular penetration testing and security audits.
- Role-based access controls (RBAC) to limit data access.
- Automated backup systems with 30-day retention.

## 6. Data Retention

---

We retain personal and financial data for a minimum of 7 years in accordance with ATO record-keeping requirements and the Corporations Act 2001 (Cth). After the retention period, data is securely deleted or anonymised. You may request deletion of non-mandatory data at any time.

## 7. Your Rights

---

Under the Australian Privacy Act, you have the right to:

- Access the personal information we hold about you.
- Request correction of inaccurate or incomplete information.
- Complain about a breach of your privacy.
- Withdraw consent for non-essential data processing.

To exercise these rights, contact us at [info@hsfinances.com.au](mailto:info@hsfinances.com.au). We will respond within 30 days.

## 8. Cookies and Tracking

---

Our websites and applications use cookies and similar technologies to improve functionality and user experience. You may control cookie settings through your browser. Essential cookies cannot be disabled as they are required for service operation. Analytics cookies are used to improve our platforms and are subject to your consent.

## 9. Incident Response

---

In the event of a data breach that is likely to result in serious harm, we will notify affected individuals and the Office of

## Headstart Finances Australia Pty Ltd

ABN: 88 656 265 860 | 11 York Street, Sydney, NSW 2000, Australia

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

---

the Australian Information Commissioner (OAIC) within 72 hours of becoming aware, in accordance with the Notifiable Data Breaches (NDB) Scheme.

### 10. Contact and Complaints

---

Privacy Officer

Headstart Finances Australia Pty Ltd

11 York Street, Sydney, NSW 2000, Australia

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

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