

Introduction

At IFRS SYSTEM, we are committed to protecting the privacy and maintaining the confidence of the users of our software and visitors to our website. We treat all of the information that is provided to us with respect and we are committed to complying with the European Union (EU) General Data Protection Regulation (GDPR) and Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth).

Who we are

IFRS SYSTEM Pty Limited and its subsidiaries (subsequently referred to as we, us, our and IFRS SYSTEM) is a privately-owned software developer with its head office in Sydney, Australia. We develop cloud-based software that is used to prepare statutory financial reports and we have operations in the Asia Pacific and United Kingdom and our users are spread throughout the world.

Data controllers and data processors

IFRS SYSTEM is the entity responsible for the collection and/or use of personal data on its clients, users, prospects and employees and it uses such data in the course of its normal business operations. We have contractual arrangements with Amazon Web Services (AWS) under which AWS provides our 'cloud infrastructure' and related services. Under this arrangement, AWS acts as a data processor in that it stores client data, including personal data, on our behalf and they do so in accordance with the AWS Data Processing Agreement (DPA). Google also acts for us as a data processor for our email services (Gmail) and for non-identifiable analytics on our website. We use MailChimp to provide update and service emails to all IFRS SYSTEM users. Further information regarding AWS, Google and MailChimp GDPR compliance can be found at:

- <https://aws.amazon.com/compliance/eu-data-protection>
- <https://privacy.google.com>
- <https://mailchimp.com/legal/privacy>

Information we collect and how we use it

We collect information in a number of ways, and the information collected will depend on the method of collection as follows:

Website – information collected via our website falls into two categories.

Category 1 is 'non-identifiable information' which allows us to see, among other things, how many visits there have been to our site, how long the visits last, which pages were accessed, the geographic region of the visitor and the type of browser they used, etc. Under this category we do not collect information that can be used to identify individual. We use cookies to collect this data.

Category 2 is information that is voluntarily provided by a visitor to our website in the form of an event registration, subscription, information request or software order/purchase. Category 2 information may include a person's name, job title, email address, company name, company address, telephone number and, where applicable, credit card details.

Provision of products and services

The IFRS SYSTEM product requires users to provide the information that is required to complete a complying statutory financial report (reporting data) within a specified geographic zone. While this information will vary according to the type of entity and the basis of preparation of the report, it will typically include: Trial Balance data, required disclosures, adjustments (if any) and Director's details. In addition to the company information, the IFRS SYSTEM will also store the names and email addresses of all persons licensed to use it. Some of this data may also be collected if/when we provide support services.

Third party sources

On occasions we will acquire information from third party sources, such as professional accounting bodies. If we acquire information from third party sources we ensure that the provider has the required permissions and consent to make the data available to us. The information we acquire from such sources will be limited to an individual's name, postal or email address, job title and company name.

Harvesting

We maintain a database of prospects by obtaining information from publicly available sources. This activity is conducted in-house and the information we harvest is limited to an individual's name, postal or email address, job title and company name, where we believe that individual may be interested in our software. Individuals are removed from the prospect database as and when removal is requested.

Information is used according to the manner in which it is collected

- Website category 1 information is used to improve visitor's website experience and our marketing messages.
- Website category 2 information is used to confirm or fulfil the visitor's request and populate our prospect database.
- Provision of products and services information is used to support users in the effective use of IFRS SYSTEM software.
- Third party sources and harvested data is used for marketing purposes and on request the individual's details will be removed from our prospect database.

Our legal basis for processing personal data

Our basis for processing personal data is that a) we have consent and b) there is a contractual obligation between Licensor and Licensee under the End User Licence Agreement (EULA) and the personal data of the of Licensee's employees and Directors (where) relevant is required in order to fulfil that obligation.

The IFRS SYSTEM EULA is available at http://files.ifrssystem.com/user/IFRSSYSTEM_EULA.pdf

Sharing of personal data

We do not rent, sell, share or otherwise distribute any data that we control, except where such data may be stored for legitimate purposes by one of our previously identified data processors, or as may be required by law.

Storage and retention of data

Data, including personal data, that is provided by users of the software and is needed to prepare complying statutory financial reports will be stored in an IFRS SYSTEM AWS location chosen by the Licensee. We may add new locations from time to time and to check current available locations email enquiries@ifrssystem.com or visit www.ifrssystem.com.

We retain data for as long as is necessary for us to fulfil our obligations under the EULA or as otherwise may be required by law. A Licensee, via its authorised user(s), may delete reporting data, including personal identifying information of user(s), at any time. If a user's personal identifying data (i.e. name and email address) is deleted that user will not be able to access the IFRS SYSTEM software.

Data, other than Licensee's reporting data, held by us will be stored in Australia or the United Kingdom. Such data will include our prospect database, Google or MailChimp analytics, email records and Licensee's invoice and payment information and other business records. Material that is likely to include personal data will be retained as follows:

- Prospect database information - until removal is requested
- Credit card details - stored only for processing and deleted once payment is processed
- Emails - deleted after three years
- Business records - deleted after seven years

All of our business and client information is kept in electronic formats, we do not keep paper records. Accordingly, the method of information disposal will be deletion of the record or data.

Protection of data

We utilise multiple layers of security controls (software, physical and process based) to protect the data we control. We also require our data processors to also have appropriate layers of security, control and commitment to privacy and data protection.

The IFRS SYSTEM Software is accessed via HTTPS using Transport Layer Security (TLS). TLS is a cryptographic protocol designed to protect information transmitted over the internet, against eavesdropping, tampering, and message forgery.

Once client data reaches IFRS SYSTEM's cloud infrastructure, all information is then encrypted at rest, using AES-256, military grade encryption. This is done to protect client information in the event of a server being compromised.

Rights in relation to personal data

You may request a copy of the personal information held about you. Should you believe that any personal data we hold on you is incorrect or incomplete, you have the ability to request to see this information, rectify it or have it deleted. You can email your request to enquiries@ifrssystem.com.

We will respond to you as soon as possible (usually within 48 hours) via email. If the personal information which is the subject of your request was provided to us by a Licensee in accordance with the EULA we may advise the Licensee of your request.

Breach or suspected breach

In the event that our security was breached, or if we suspect a breach, we will notify all affected clients and relevant authorities at the earliest opportunity and we will, as a matter of priority, take all necessary corrective action.

Complaints

If you believe we have handled your personal data inappropriately you can email your complaint to enquiries@ifrssystem.com. We will investigate your complaint and work with you to resolve the matter.

If you are not satisfied with our handling of the matter you should contact the Information Commissioners Office (UK matters) or the Office of the Australian Information Commissioner (Australian matters) and register a complaint.