

LeVeon Business Advisors

BUSINESS PRIVACY POLICY

Effective 23 September 2026

LeVeon Business Advisors Pty Ltd
Suite 14A, 478 The Esplanade, Warners Bay NSW 2282
0488 008 259 | rod@leveon.com.au | www.leveon.com.au

This policy explains how LeVeon Business Advisors collects, holds, uses, discloses and protects Personal Information, including where third-party technology and service providers process information on our behalf.

1. Privacy Policy

LeVeon Business Advisors Pty Ltd (LeVeon, we, us or our) is committed to managing Personal Information responsibly and transparently. This policy describes our ongoing obligations in relation to Personal Information that we collect and hold.

We have adopted the Australian Privacy Principles (APPs) contained in the Privacy Act 1988 (Cth). The APPs govern how Personal Information is collected, held, used, disclosed, secured, accessed and corrected.

Further information about the Australian Privacy Principles is available from the Office of the Australian Information Commissioner (OAIC).

2. What is Personal Information?

Personal Information is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Depending on the services we provide, the Personal Information we collect or hold may include:

- names, addresses, email addresses, telephone numbers and other contact details;
- dates of birth and identification information where reasonably necessary;
- business, employment, directorship, ownership and related-party information;
- financial, accounting, taxation, payroll, superannuation and transaction information;
- Australian Business Numbers, Tax File Numbers and other government-related identifiers where permitted by law;
- banking and payment information where required for our services;
- information contained in correspondence, meetings, documents and records supplied to us; and
- other information reasonably necessary for us to provide accounting, taxation, business advisory, compliance, systems or related professional services.

3. How we collect Personal Information

We generally collect Personal Information directly from you or with your authority. We may collect information through meetings, telephone calls, email, online forms, correspondence, document uploads, our website and the software platforms used to deliver our services.

We may also receive Personal Information from third parties where reasonably necessary for our services, including your employees, contractors, related entities, previous advisers, government agencies, financial institutions and software or technology providers that you or we have authorised to exchange information.

Where reasonable and practicable, we will take steps to ensure you are aware of the circumstances in which Personal Information has been collected from another source.

4. Why we collect, hold, use and disclose Personal Information

We collect, hold, use and disclose Personal Information where reasonably necessary for our functions and activities, including to:

- provide accounting, taxation, business advisory, compliance and related professional services;
- administer our client relationship, engagements, billing and communications;

- prepare and lodge documents, reports, returns and other information with authorised recipients;
- operate, integrate, automate and improve our business systems and workflows;
- verify identity, perform client due diligence and meet legal, professional and regulatory obligations;
- communicate information about our services where permitted by law;
- maintain records, quality control, security, business continuity and internal administration; and
- comply with applicable laws, court or tribunal orders and requirements of regulators or professional bodies.

5. Sensitive Information

Sensitive Information has the meaning given in the Privacy Act and can include information about an individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, trade or professional association membership, criminal record, health information and certain biometric information.

We will only collect, use or disclose Sensitive Information where permitted by law, including where it is reasonably necessary for our functions and activities and the required consent has been obtained, or where another legal exception applies.

6. Third parties and service providers

LeVeon uses third-party service providers and technology platforms to operate our business and deliver services to clients. These providers may access, receive, store, host, transmit or otherwise process Personal Information on our behalf where this is reasonably necessary for the relevant service or integration.

The types of third parties we may use include:

- accounting, taxation and practice-management platforms;
- customer relationship management and client engagement platforms;
- workflow automation and systems-integration providers;
- cloud hosting, email, document management and collaboration providers;
- identity verification, anti-money laundering and client due-diligence providers;
- billing, payment and proposal-management providers;
- project, workflow and operational management platforms;
- IT, cybersecurity, website and professional service providers; and
- government agencies, regulators and other recipients where authorised or required by law.

Examples of technology platforms used by LeVeon may include Xero and Xero Practice Manager, n8n, HubSpot, Microsoft 365, Ignition, Projectworks and client verification or compliance platforms. The particular providers used may change from time to time as our systems and services evolve.

Third-party access is provided only where there is a legitimate business or service requirement. We seek to limit access and data sharing to information reasonably necessary for the relevant function and use appropriate contractual, access-control and security arrangements having regard to the nature of the service and information involved.

Where information is transferred between authorised systems using application programming interfaces (APIs) or workflow automation, those integrations are used to support legitimate business functions such as client administration, practice management, workflow automation, reporting and service delivery.

7. Disclosure of Personal Information

We may disclose Personal Information:

- to third-party service providers described in this policy where reasonably necessary for them to provide services to us or our clients;
- to professional advisers, contractors or specialists engaged in connection with the services we provide;
- to government agencies, regulators, courts, tribunals or other parties where required or authorised by law;
- where you have consented to the disclosure; or
- where another disclosure is permitted by the Privacy Act or other applicable law.

We do not sell client Personal Information to third parties.

8. Overseas processing and disclosure

Some third-party technology or service providers may process, host, support or store information outside Australia, including through global cloud infrastructure or overseas support operations. The countries involved can vary according to the provider, service configuration, data-hosting region and support arrangements.

Where the Privacy Act applies to an overseas disclosure, we take reasonable steps required by law in relation to that disclosure. Where practicable, information about relevant overseas locations may also be obtained from the privacy or data-hosting information published by the applicable service provider.

This section should be read together with the 'Third parties and service providers' section above.

9. Security of Personal Information

We take reasonable steps to protect Personal Information from misuse, interference and loss, and from unauthorised access, modification or disclosure. Depending on the information and system involved, these measures may include access controls, authentication, encryption, secure cloud services, endpoint and network protections, backups, logging, monitoring, staff controls and vendor security measures.

No method of electronic transmission or storage is completely risk-free. We review our security arrangements and service providers having regard to the nature of the information we hold and the services we provide.

10. Retention and disposal

We retain Personal Information for as long as reasonably necessary for the purposes for which it was collected and to satisfy our legal, taxation, professional, contractual and record-keeping obligations. Client files will generally be retained for at least seven years, or longer where required or appropriate.

When Personal Information is no longer required and there is no legal or other legitimate reason to retain it, we will take reasonable steps to destroy or permanently de-identify it.

11. Access to and correction of Personal Information

You may request access to Personal Information we hold about you and may ask us to correct information that is inaccurate, out of date, incomplete, irrelevant or misleading, subject to applicable exceptions under the Privacy Act.

We may require appropriate identification before providing access or making a correction. We do not ordinarily charge for making an access request, although we may charge a reasonable administrative cost where

permitted for providing access.

12. Maintaining the quality of Personal Information

We take reasonable steps to ensure that Personal Information we collect, use and disclose is accurate, up to date, complete and relevant, having regard to the purpose for which it is being handled. Please contact us if you believe information we hold about you should be updated or corrected.

13. Direct marketing

We may use contact information to communicate with clients and prospective clients about LeVeon's services where permitted by law. You may ask us to stop sending direct marketing communications by using the unsubscribe facility provided, where applicable, or by contacting us.

14. Privacy complaints and enquiries

If you have a question, concern or complaint about how LeVeon has handled your Personal Information, please contact us using the details below. We will consider the matter and respond within a reasonable period.

LeVeon Business Advisors Pty Ltd

Suite 14A, 478 The Esplanade

Warners Bay NSW 2282

Phone: 0488 008 259

Email: rod@leveon.com.au

If you are not satisfied with our response, you may be entitled to contact the Office of the Australian Information Commissioner.

15. Policy updates

We may update this Privacy Policy from time to time to reflect changes to our services, technology, legal obligations or information-handling practices. The current version will be made available on our website.

Effective date: 23 September 2026