

Hughes Group Services Privacy Policy

Hughes Group Services Pty Ltd trading as R&D SmartTax ("Hughes Group Services") is committed to protecting the privacy of its customers. This Privacy Policy explains our privacy practices for our website, www.smarttax.com.au, on the World Wide Web (the "Site"), as well as for Hughes Group Services Internet-delivered services that may be accessed through the normal use of our products (the "Services"). You can travel through most of our Site without giving us any information about yourself. But sometimes we do need information to provide services that you request. The following statement explains our information-gathering and dissemination practices. Please read the complete Hughes Group Services Privacy Policy.

General Information

Hughes Group Services may periodically update this Privacy Policy. If so, Hughes Group Services will post the updated Privacy Policy on this Site. Hughes Group Services encourages you to review this Privacy Policy from time to time for any changes. Hughes Group Services will not provide advance information of changes to this policy.

By using this Site or any products or services provided through the Site, you expressly consent to the use and disclosure of information as described in this Privacy Policy.

IF YOU DO NOT AGREE WITH ANY OF THE TERMS BELOW, YOU SHOULD NOT USE THIS SITE OR THE PRODUCTS OR SERVICES OFFERED BY HUGHES GROUP SERVICES AT THIS SITE.

Privacy Act

Hughes Group Services has elected to be covered by the provisions of the Privacy Act 1988 ("the Act"). This means that Hughes Group Services has accepted that it has responsibilities to protect the privacy of its customers. Hughes Group Services will comply with the provisions of the National Privacy Principles embodied in the Act. For further details of the National Privacy Principles, see the Web site of the Office of the Privacy Commissioner at -

What Information We Collect

You may decide whether to proceed with any activity that requests personally identifiable information. If you do not wish to provide the requested information, however, you may not be able to complete the activity or transaction.

Except as described below, Hughes Group Services will only disclose your personally identifiable information to third parties if acting under a good faith belief that such action is necessary

- (1) to conform to legal requirements;
- (2) to protect and defend the rights or property of Hughes Group Services;
- (3) to enforce the Hughes Group Services Terms of Service; or
- (4) in the event of a merger, acquisition or sale of all or substantially all Hughes Group Services's assets relating to the business in connection with which the information was collected. Hughes Group Services collects personally identifiable information that can be divided into the following categories:

Hughes Group Services Product Registration Information: Some Hughes Group Services products ask you for certain personally identifiable information as part of the installation/registration process (including but not limited to your name, product delivery

address, email address, telephone number and credit card information). Certain of this information is necessary in order to conclude the transaction, and for applicable products, to be eligible to receive technical support. If you provide us with personally identifiable information, and select the "Inform me about important updates and news" option on the purchase confirmation page or in the "Registration" section in the Hughes Group Services product, we use this information to send you communications, including informative emails/newsletters about Hughes Group Services product upgrades, new products, and services, and to provide you with special offers that may be of interest to you, which may include paid advertisements from third parties. In the event you no longer wish to receive such information, you may choose to opt out of receiving further communications by complying with the procedures listed in the "Updating/Unsubscribing Your Email Address" section of this Privacy Policy. Except in the case of Partner Products (see below), Hughes Group Services keeps personally identifiable information collected in the course of installation/registration of Hughes Group Services's products confidential and does not sell, trade, or exchange mailing lists with any organization.

Partner Product Purchases: Some products offered via the Site may be third-party products ("Partner Products") offered by Hughes Group Services's partners ("Hughes Group Services Partners"). If you purchase Partner Products from this Site, Hughes Group Services will ask you to provide personally identifiable information as part of the installation/registration process (including but not limited to your name, product delivery address, email address, telephone number and credit card information). You need to provide this information in order to conclude the transaction. Hughes Group Services provides this information, except credit card information, to the applicable Hughes Group Services Partner to enable the applicable Partner to register your purchase and verify support eligibility, where applicable. Hughes Group Services will require the applicable Hughes Group Services Partner to use your information only to verify support eligibility and, in the case of certain Partner Products, to provide you required updates. Hughes Group Services will not share this information with any other third party.

Co-branded Pages: Hughes Group Services may provide commerce functionality for selected partner companies who wish to offer Hughes Group Services products to their customers and/or users. If you come to the Site by accessing a link provided by a partner company, you will be informed that your information (not including credit card) will be shared with the partner company. You will have the option to "opt-out" of promotional communications from both Hughes Group Services and the partner company; to do so you must clear the "I wish to be kept informed." checkbox on the billing page before completing the transaction.

Credit Card Information: If you use a credit card to purchase products via this Site, your name as it appears on the credit card, the credit card number, expiration date and billing address will be encrypted as it passes over the Internet. Hughes Group Services does not record or keep your credit card information for online credit-card transactions; rather such information is simply passed through to our contracted payment processing vendor. Hughes Group Services may access such information through the payment processing company, but does not do so except to process refunds or adjustments and to the extent necessary in the event of non-payment or disputed payments, or as may be necessary for Hughes Group Services's compliance, in Hughes Group Services's discretion, with applicable law. Credit card details provided via hard copy media will be stored securely on Hughes Group Services premises, or in a secure storage facility. Hard copy media will be destroyed once legal storage periods have expired, provided that Hughes Group Services does not require the information for legal purposes.

Technical Support: If you request technical support online, we will ask you for information necessary to complete the transaction such as your name, email address and information about your computer hardware, software, and the nature of the problem you are experiencing. In the course of providing support, your data may be transmitted to service providers that are under contract to Hughes Group Services and have agreed to abide by the provisions of this privacy policy. Such transmissions of your data are encrypted and secure.

Partner Application: If you request participation in the partner program online, we will ask you for information necessary to complete the transaction such as company name, product delivery address, email address, and company profile.

Surveys: Hughes Group Services may periodically request information from users via surveys. Participation in these surveys is completely voluntary and you have a choice whether or not to disclose this information. Hughes Group Services may employ both in-house and third-party Web-Based Interviewing Systems to compile the surveys. Information requested in the surveys may include broad demographic information (such as post code, age level) for aggregate use and does not identify the user. No cookies are used. Survey information is not sold, shared, or rented to any third party, and is used internally solely by Hughes Group Services for purposes of improving the use and satisfaction of this Site, Services, and our products.

If You Opt to Receive Communications, How We Will Contact You:

Email

With your permission, Hughes Group Services will send you communications, including informative emails/newsletters about product upgrades, product updates, new products, and services. These communications may provide you with special offers that may be of interest to you, and may include paid advertisements from third parties. Hughes Group Services may use a third-party provider of outbound email technology to send email from their servers on our behalf. The provider does not collect information about you but does collect requests to unsubscribe.

Special Offers

Hughes Group Services may have relationships with business partners that provide a number of third-party products and services. With your permission, Hughes Group Services will notify you about special offers that may include links to third-party products and services.

Site Functionality

Cookies: Persistent "cookies" are small pieces of information that your browser stores on your computer on behalf of a Web site that you have visited. This Site does not use persistent cookies. In order to complete transactions on our site, we may use session cookies. These session cookies do not collect information about you, only about your browser session, and they are destroyed when you close your browser. No data is stored on your computer.

Log Files: We (Hughes Group Services and/or our contracted web analytics provider(s)) do keep track of the domains from which you access our Site and Services on the World Wide Web, and may log IP addresses or other identifiers for statistical purposes. We do this to gather broad demographic information for aggregate use to identify and analyse trends and the results of our marketing efforts, to help diagnose problems with our servers and to administer the Site and Services, and analyse users' movements. We may periodically share aggregate demographic information with our business partners. IP addresses and other identifiers are not linked to personally identifiable information.

Links: The Site contains links to other Web sites. Please note that when you click on one of these links, you are "clicking" to another Web site. We encourage you to read the privacy policies of these linked sites, as their privacy policies may differ from ours. This Privacy Policy applies solely to information collected by Hughes Group Services on this Site.

Security of Your Information

All information gathered on the Site is stored and maintained in secure facilities. In addition, internal security provides that this information is coded with restricted access, and our servers are kept in a secure, locked environment that limits access to authorised personnel only. All Hughes Group Services employees, and all external service providers who may process and/or store customer data, are briefed about the company's privacy and security policies on a regular basis. The Site is regularly tested for security breaches to ensure that all information collected is secure from unauthorised viewing. Any service providers with whom Hughes Group Services contracts, and who receive, store, or process personally identifiable customer

data, have committed to abide by the provisions of this privacy policy. All transmissions of personally identifiable customer data are encrypted and secure. Except as required by law, once entered to our computer systems any hardcopy records will be destroyed securely. Such data will be stored in encrypted form.

Correcting/Updating Personal Information

You are free to update your information at any time. At your request, Hughes Group Services will change your information; we may request evidence of your identity before doing so. Inasmuch as your information will never be used without your explicit consent, we are not able to update the email address to which you subscribe to Hughes Group Services communications on your behalf. Should you wish to update the email address at which you receive communications from us, please see the next section ("Updating/Unsubscribing Your Email Address") below.

To request that your information be changed, please use one of the following options:

Send email to us at privacy@smarttax.com.au

By Postal Mail: Attn: Privacy Contact
Hughes Group Services Pty Ltd
PO Box 159
Aspley, QLD 4034

Breach of Privacy Principles

If you feel Hughes Group Services has breached its privacy responsibilities you should provide details in writing to:

Attn: Privacy Director
Hughes Group Services Pty Ltd
PO Box 159
Aspley, QLD 4034

All complaints will be treated with the utmost diligence.

Alternative methods to lodge a privacy-related complaint are:

Send email to us at privacy@smarttax.com.au

Access to Personal Information

Hughes Group Services will provide details of personal information held for an individual on request, once Hughes Group Services has satisfied itself of the individual's identity. Where possible details will be provided via on-line access; if on-line access is not available a written report will be prepared within 15 business days of the requestor's identity being confirmed.

Credit card details will not be included in details provided unless specifically requested.

Requestors may be asked to defray staff costs if compilation of the data is complex or time consuming. In general, however, costs will be borne by Hughes Group Services,

Use of an Intermediary

When a requestor is unable to use Hughes Group Services's on-line review facility, and is unable to receive details by mail, an intermediary acceptable to both the requestor and Hughes Group Services may be appointed. The intermediary will be deemed to be an agent of the requestor, and any changes sought by the intermediary will be deemed to have the same authority as though they were made by the requestor.

The requestor will be responsible for any costs incurred by the intermediary in acting on the requestor's behalf.