

# Privacy Policy

---

## 1. Our Commitment to Privacy

Headstart Finances Australia Pty Ltd (ABN 88 656 265 860), trading as AccFino, is committed to protecting your privacy in accordance with the Australian Privacy Act 1988 (Cth) and the 13 Australian Privacy Principles (APPs).

## 2. Information We Collect

---

### 2.1 Information you provide

- Account registration: name, email, business name, ABN
- Financial data: bank statements (CSV), transactions, invoice data
- Payment information: billing address, payment method (processed by Stripe)
- Support communications: emails, chat transcripts

### 2.2 Automatically collected

- Usage data: pages visited, features used, session duration
- Device data: browser type, IP address, operating system
- Cookies and tracking technologies

### 2.3 Open Banking data

Bank account balances and transaction data via CDR-accredited data holders, only with your explicit consent.

## 3. How We Use Your Information

---

- To provide, maintain and improve AccFino services
- To process subscription payments via Stripe
- To generate financial reports, reconciliations and CGT calculations
- To send transactional emails and product updates
- To comply with legal obligations under Australian law
- To detect and prevent fraud and security incidents

## 4. Disclosure

AccFino does not sell your data. We may share with: Stripe (payments), CDR data recipients (Open Banking), AU cloud infrastructure providers, and law enforcement where required.

## 5. Data Storage and Security

---

Data stored on Australian servers with TLS encryption in transit, AES-256 at rest, access controls and regular security audits.

## 6. Data Retention

---

Account and financial data retained for the duration of your subscription and 7 years after closure per Australian taxation requirements.

## 7. Your Rights

---

- Access personal information AccFino holds about you
- Request correction of inaccurate information
- Request deletion (subject to legal retention obligations)
- Withdraw Open Banking consent at any time
- Lodge a complaint with the OAIC at [oaic.gov.au](http://oaic.gov.au)

Contact: [privacy@accfino.com](mailto:privacy@accfino.com)

## 8. Consumer Data Right (CDR)

---

AccFino participates in the Australian CDR framework. You control data scope, duration and revocation. Contact [cdr@accfino.com](mailto:cdr@accfino.com) for CDR queries.

## 9. Contact

---

Privacy Officer | Headstart Finances Australia Pty Ltd | ABN 88 656 265 860 | [privacy@accfino.com](mailto:privacy@accfino.com) | [accfino.com](http://accfino.com)

Complaints: OAIC — [oaic.gov.au](http://oaic.gov.au) | 1300 363 992

---

Effective Date: 28 May 2026 | Version 1.0

Headstart Finances Australia Pty Ltd | ABN 88 656 265 860