

# Privacy policy

September 2020

This Privacy Policy is for Aware Super Pty Ltd, VicSuper<sup>1</sup> and their related entities; collectively referred in this policy as the Group. This policy outlines how personal information is collected, held, used and disclosed by the Group, and provides information on your rights regarding your personal information.

## We respect your privacy

This privacy policy applies to the following entities:

- Aware Super Pty Ltd as trustee for Aware Super;
- Aware Financial Services Australia Limited is wholly owned by Aware Super. Aware Financial Services Australia Limited provides financial planning advice to clients including Aware Super members and is also the trustee of the Aware Investment Funds;
- VicSuper Pty Ltd (ABN 69 087 619 412); and
- Aware Super Services Pty Ltd (ABN 67 633 384 059).

References to 'we', 'us' or 'our' throughout this document refer individually or collectively to the above entities.

Protecting your personal information has always been important to us. We take our obligations under the Privacy Act 1988 (Cth) and applicable state/territory privacy acts very seriously. These Acts require us to handle your personal and health information in accordance with the Australian Privacy Principles (APPs) and any relevant state/ territory health privacy principles.

Where you have provided us with a signed third-party authority or power of attorney, we will disclose information to only those named individuals you have authorised.

## What is personal information?

Under the Privacy Act 1988, personal information is defined as information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Some personal information is further classified as 'sensitive information'. Under the Acts referenced, sensitive information is personal information or an opinion about an individual's health, ethnic or racial origin, political opinions, membership of political associations, religious beliefs or affiliations, philosophical beliefs, trade union membership, professional or trade association membership, sexual preferences or practices, criminal record or biometric information that is to be used for certain purposes.

## How we collect the information

We collect your personal information to inform and / or provide our products and services to you. Most of your personal information is collected directly from you or your employer, or other super funds when you roll your money in to our funds, or through your contact with our customer service team, or through research and seminars that you elect to participate in. We also collect personal information when you use our website or mobile applications, subscribe to newsletters, register for seminars and use online forms. Your personal information may also be provided to us by lawyers, courts or government agencies and our related entities. We use social networking services such as Twitter and Facebook to communicate with the public. We may also use social networking services to collect your personal information to help us communicate with you.

To improve the user experience, we may use cookies to collect information on how you use our websites and mobile application. A "cookie" is a small piece of data sent from a website and stored on the user's computer by the user's web browser while the user is browsing. The information collected through cookies may include your

<sup>1</sup> From 1 July, this Privacy Policy applies to all VicSuper products that are now offered as part of the VicSuper division of Aware Super.

computer's Internet Protocol (IP) address, browser type, date and time of your visit and overall website usage. This information is used for analytical purposes such as to customise web pages, save your site login information and present targeted marketing information to you about our products and services.

When personal information is collected from third parties such as a tax agent, accountant or another super fund, it is only collected with a third-party authority provided by you.

In some cases, it might be necessary for us, to collect sensitive information including health information about you from third parties such as your employer, doctors or entities such as hospitals or other relevant persons.

Due to the nature of our business, it is difficult for us to deal with you anonymously and to do so may restrict the range of products and services we can offer you. On some occasions (such as participating in a market survey), you may have the option to deal with us anonymously or use a pseudonym.

If you choose not to provide the information, we may not be able to provide important services to you, for example determining your eligibility for a superannuation benefit.

### What personal information do we collect and hold about you?

We may collect a range of personal information about you. This may include, but not limited to:

- name, address, date of birth and contact details;
- Tax File Number (TFN);
- employment details and employment history;
- financial information such as bank balance, superannuation balance, assets, liabilities, investments, insurance, income and expenditure;
- payment information including bank account and credit card details;
- information about your family corporate structure, such as entity or any trusts and its beneficiaries and settlors;
- information about your family commitments and social security eligibility and entitlements;
- details of your financial circumstances and objectives including your risk tolerance;
- information about your beneficiaries;
- details about your citizenship, residency or visa status; and
- educational details for those joining the Student Club.

Also, sensitive information (such as health information) may be obtained during the assessment of an application for insurance cover or to extend or vary cover that is in place, or for the assessment of an insurance claim.

### How we use your personal information

We use your personal information to:

- open, administer and maintain your membership/client account and records;
- establish and administer the financial and

superannuation products and services (including insurance cover) that you acquire from or through us;

- Assisting employers in meeting their superannuation obligations;
- trace different superannuation accounts in your name and if necessary, use your TFN to match your accounts in Aware Super and consolidate them in line with our policy on consolidation;
- provide you with financial planning advice and related services, including the preparation of advice documents and implementation documents (i.e. in order to implement financial planning recommendations for you);
- provide you with estate planning services;
- provide you with promotional information and services about us;
- conduct identity verification;
- directly market our products and services to you; including through social media and other digital platforms;
- undertake market research, member/client satisfaction surveys and member/client data analysis;
- improve our products and services;
- provide Student Club membership benefits; and
- comply with all applicable laws.

If you apply for a job with us, we will collect your information for recruitment purposes, to manage your application and for your ongoing employment.

### How we disclose your information

When we disclose your personal information to a third party who is providing services to us, we take reasonable steps to ensure the third party protects your information in accordance with privacy laws and treats it confidentially.

In certain instances, we may disclose your personal information to certain third parties so that they may use and disclose your personal information for any of the purposes referred to above. Such third parties may include:

- the fund administrators;
- insurers;
- legal advisers;
- auditors;
- mailing houses;
- death benefit beneficiaries;
- our related entities including Aware Super Legal Pty Ltd (ABN 91 606 835 170);
- service providers and other advisers appointed by us;
- social media and other digital platform providers that we engage with to facilitate our direct marketing activities;
- affiliated organisations;
- employers and former employers (non-sensitive information only);
- government agencies (e.g. the ATO, Centrelink,

Department of Veteran Affairs, ASIC, APRA, AUSTRAC, Office of State Revenue);

- international regulatory bodies (e.g. the U.S Internal Revenue Service); and
- medical practitioners (e.g. in the case of an insurance claim).

We are also required, if requested, to provide certain information about your interest in the fund to:

- a. your spouse; or
- b. a person who intends to enter into an arrangement (e.g. a pre-nuptial agreement) with you about splitting your superannuation interests in the event of a marriage breakdown. We are obliged to comply with such requests and release certain information prescribed under the Family Law Act and Regulations without informing you.

When you request a transfer of your super benefits to a New Zealand KiwiSaver scheme, we would transfer your personal information with your express consent.

### Direct Marketing

We may use your personal information to send you direct marketing communications and information about our services and products, in accordance with the Spam Act and Privacy Act. We engage third party service providers to assist us with delivering direct marketing via various channels, including through social media and other digital platforms. We take all reasonable steps to ensure that your personal information is protected when disclosing information to such third parties.

Sometimes, we may de-identify your information before disclosing it to third parties to facilitate our marketing activities.

Members may opt-out of receiving direct marketing communications by contacting us using the details provided in the policy or by using the relevant opt-out facilities provided in each communication (e.g. an unsubscribe link).

### Consumer Insights

We may collect, use or disclose information about you in order to combine the information that we hold about you with information about you collected from or held by other trusted partners or from public sources. We do this in order to enable the development of consumer insights about you so that we and those other trusted companies can serve you better. This includes being able to better understand your preferences and interests, personalise your experience, enhance the products and services you receive, and to tell you about products and services. We may also use trusted service providers to undertake the process of creating these consumer insights. If you don't want us to develop and use these insights about you, please contact us using the contact details provided in the policy.

### Relevance and accuracy of information

We only collect information that is relevant to your Aware Super membership, the provision of financial planning and estate planning services to you, or for Student Club membership. Before we use the information, we endeavour to ensure it is accurate and up to date.

You have the opportunity to update your information by advising us of changes to your personal details such as your address, telephone number and email address. You should also notify us if there are any incorrect details or omissions in your personal information.

### Retention and security

We hold personal information in hard copy and electronic formats. We aim to keep the personal information only for as long as we need it for business or legal reasons.

We take security measures to protect the personal information we hold including physical (for example, security passes to enter our offices and storage of files in lockable cabinets) and technology (for example, restriction of access, firewalls, the use of encryption, user logons, passwords,

biometric authentication and digital certificates) security measures. In some cases, we engage third parties to host electronic data (including data in relation to the services we provide) on our behalf. These data warehouses may be located overseas. The countries where these data warehouses are located can be viewed [here](#). These data warehouses will have in place appropriate security and privacy protocols to comply with Australian Privacy Act and Australian Privacy Principles.

### Online security

Members, clients and employers have access to their accounts online and these details are held in a secure environment. If you visit an unsecured area of our public website, that does not require your log in details, we will not collect or retain your personal information. If you complete any forms on the public website, we will retain your contact information securely.

Users can play an important role in the security of their information by keeping their user logins and passwords to their online accounts and our mobile applications confidential and ensuring their biometric identifier for authentication used to access the mobile applications is the only identifier stored on their mobile devices. We encourage you to be vigilant about the protection of your own personal information when using third party digital services (such as social media platforms).

As far as reasonably practicable, we will make sure that our relationships with third parties include appropriate protection of your privacy.

### Data breaches

We must report certain data breaches to the Office of the Australian Information Commissioner (OAIC) and where required, the impacted members.

### Your rights to access and correct your information

You have rights under the Australian Privacy Principles to request access to and correction of information we hold about you. We encourage you to advise us of any personal

detail changes as they occur.

You should contact our Customer Service on 1300 650 873, or write to our Privacy Officer at:

Privacy Officer PO Box R1827

Royal Exchange NSW 1225

### Enquiries and complaints

If you have any questions about privacy or would like to enquire or make a complaint about a breach of your privacy, please contact our Privacy Officer at the above address.

We will respond to you within 30 days of receipt of your enquiry or complaint. If you are not satisfied with the resolution of your complaint by our Privacy Officer, you can contact the OAIC by telephone on 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

### Notification of changes

We may update this Privacy Policy from time to time. Our up-to-date Privacy Policy is published on our website. All information about you which is held by us, will be governed by our most recent Privacy Policy. If you are unsure whether you are reading the most current version of this Privacy Policy, please contact us. We can provide a copy of the most current version of our Privacy Policy on request.

### Contact details

**Phone** 1300 650 873

**Fax** 1300 722 072

**Email** [enquiries@aware.com.au](mailto:enquiries@aware.com.au)

**Web** [www.aware.com.au](http://www.aware.com.au)

**Post** PO Box R1827, Royal Exchange NSW 1225