

Privacy policy



Approved by the Boards of UniSuper Limited and UniSuper Management Pty Limited on 6 March 2014.

Introduction to UniSuper's Privacy Policy

UniSuper is committed to protecting the privacy and the confidentiality of your information. As a superannuation fund and not for profit organisation, our purpose is to act in members' best interests. We are committed to managing the privacy of all of your information in a secure environment.

This Privacy Policy applies to UniSuper (UniSuper Limited and UniSuper Management Pty Ltd) and explains the way we manage and protect your information. These entities share your information and work together to provide your membership benefits. For example, UniSuper Limited, as trustee is responsible for managing your insurance arrangements and UniSuper Management Pty Ltd for administering your account.

How is Privacy Managed?

UniSuper is bound by the Privacy Act 1988 (Privacy Act) which includes 13 Australian Privacy Principles. These principles regulate the way we handle your personal and sensitive information. UniSuper manages the privacy of your personal information in accordance with our privacy legislative obligations.

What is Personal Information?

Personal information is your information and includes personal details or opinions you may have, for example, your name, address, phone number, email address and date of birth.

UniSuper only collects personal information from you if it is necessary to carry out our functions and activities. This is so that we can best offer our products and services to you.

We have a sound privacy framework supported by industry practices that comply with our legislative privacy obligations to ensure you can have confidence that your information is safe and secure. Privacy is managed at each stage of the

information lifecycle. The framework provides mechanisms for you to have awareness over the manner in which your information is managed and allows you to:

- understand why your personal information is being collected, how it will be used and who it will be disclosed to;
- access a copy of your personal information;
- “opt-out” of unwanted direct marketing material;
- correct inaccurate information; and
- make a complaint if your personal information has been mishandled.

We are committed to complying with our privacy law obligations and managing them openly and transparently with you.

If you do not provide us with your personal information, we may not be able to administer your account appropriately, or provide you with a product or service.

We may also collect details of your beneficiaries, spouses and other family members, your employer and salary, your tax file number and your contributions. At times, Proof of Identification information is necessary to satisfy regulatory requirements and support our internal verification procedures. These established industry practices ensure we only deal with you when discussing and sharing information to provide trust and confidence that your information is managed securely.

How is Personal Information Collected?

UniSuper collects information directly from you to provide a range of services and product offerings. Alternatively, UniSuper may collect information through your employer when you open an account. Many of the processes and requirements that UniSuper adopts through this registration process are prescribed by regulatory bodies and therefore, UniSuper is required to capture this information to meet these requirements. We will only collect this information through lawful and fair means.

Why does UniSuper collect Personal Information?

UniSuper collects your personal information to administer your account(s), provide you with the benefits of membership, to verify your identity and to improve member services (e.g. through research, marketing, product development and planning). We will also collect personal information from you if you choose to receive financial advice and related services from us.

How we use your Personal Information that we collect

UniSuper uses and discloses your personal information for the purposes for which we have collected your information, or for a related purpose.

What happens if UniSuper is unable to collect Personal Information?

If UniSuper is unable to collect certain personal information from you, we may not be able to provide your benefits to you or to your beneficiaries. For example, if you fail to provide us with an up-to-date address, UniSuper may be required to transfer your benefits to the Australian Taxation Office or to an eligible rollover fund.

Also, if we are unable to collect certain personal information from you, we may not be able to administer your benefits at all or you may be disadvantaged. For example, if you fail to provide your tax file number, UniSuper will not be able to accept any voluntary after-tax (non-concessional) contributions from you and additional tax may be deducted from any employer or salary sacrifice (concessional) contributions made by you or your employer.

In other cases, if we are unable to collect certain personal information (e.g. your email address), we will not be able to provide you with member communications or other services as quickly or as effectively as we otherwise might.

Other Types of Information UniSuper collects

SENSITIVE INFORMATION

Sensitive information is a subset of personal information, which is afforded a higher level of privacy protection. Sensitive information includes information about your health, race or ethnicity, political opinions, criminal records, religious beliefs or affiliations, trade union or professional memberships you may be associated with.

UniSuper's policy is only to collect sensitive information where it is reasonably necessary for us to perform our services and either:

- you have consented; or
- we are required or authorised by or under law to do so.

For all sensitive information that we collect, we shall obtain your consent prior to, or on obtaining the information, or if we are required to collect this information by law. We will only obtain sensitive information from you if we need this information. If you do not provide this information, we may not be able to provide you with a product or service.

HEALTH INFORMATION

When we collect and manage health information, we comply with the terms of our Privacy Policy and with the following additional rules:

- UniSuper will collect health information only with your consent or where it is required or authorised by law.
- Generally, UniSuper will collect health information from you directly. However, in some cases, UniSuper may collect health information about you from others. This will be done only with your consent.
- UniSuper may use and/or disclose your health information but will do so only with your consent or for the primary purpose for which it was collected (that is, to enable the insurer or UniSuper to determine whether to offer you additional insurance or to enable UniSuper and/or the insurer to assess your claim for payment of the relevant benefit).
- It will not always be possible for UniSuper to give you the opportunity to correct health information held about you. However, even where UniSuper cannot correct health information as requested, UniSuper will take all reasonable steps to note any statement you make about the relevant health information.

GOVERNMENT IDENTIFIERS

UniSuper is authorised by law to collect government related identifiers such as your Tax File Number. UniSuper will not use or disclose this information other than when required or authorised by law.

DEALING WITH US ANONYMOUSLY OR WITH A PSEUDONYM

You can deal with UniSuper anonymously or with a pseudonym where it is lawful and practicable to do so. A pseudonym is a name or other description that is different from your own name.

In these circumstances, as we are limited in the amount of information that we have about you, we may be limited in our ability to provide details about our services and products applicable to your particular circumstances.

If you would like to receive complete and accurate information from UniSuper, you will need to provide us with your personal details so that we can verify your identity.

Additional Information when making a Claim

UniSuper may require additional information when you make a claim. We use this information to better assess your claim, in order to ensure that you are entitled to your full benefits. Under these circumstances, we will explain the reasons we require the information.

How does UniSuper hold and store your Personal Information?

UniSuper takes all necessary precautions to ensure your personal information (in both physical and electronic form) is secure. In particular, UniSuper operates in a secure environment that ensures protection of all paper-based personal information. As part of their roles, UniSuper staff are required to respect the privacy of all personal information in their possession. Further, all UniSuper information technology systems employ data security software and hardware.

Any personal information held by UniSuper will be destroyed or permanently de-identified when it is no longer needed for any purpose for which UniSuper might legitimately use or disclose it. We typically retain information as required by our regulatory obligations and company requirements.

Disclosure of your Personal Information

DISCLOSURE OF PERSONAL INFORMATION TO THIRD PARTIES

UniSuper engages certain external organisations to assist in the provision of services to you (e.g. mail-houses, auditors, insurers, actuaries, lawyers and research consultants). UniSuper discloses your personal information to such organisations but does so only for the purpose of providing administering or improving your superannuation membership, benefits or services.

In these instances UniSuper will engage these third parties on contractual terms and ask them to hold, use and disclose your personal information in accordance with the Privacy Act.

OVERSEAS DISCLOSURE OF PERSONAL INFORMATION

In order to provide our services and products to you, we may, in some circumstances, transfer or disclose your personal information to overseas entities including the US and UK. Where information is transferred overseas, we will seek to ensure the recipient of the data has security systems to prevent misuse, loss or unauthorised disclosure in line with Australian laws and standards.

Direct Marketing

UniSuper considers acting in your best interests as being integral to our business operations. UniSuper offers two main types of communication: member education, where we communicate to you about the benefits of your UniSuper membership, and direct marketing, where we promote our services to you.

If you do not wish to be contacted about our new products or services, you may opt-out of direct marketing at any time.

For e-mail communications, you can opt-out of receiving e-mails by selecting the “unsubscribe” option, which is attached at the base of the e-mail.

If you do not want to receive letters relating to direct marketing communication, please notify us. Please see details at the end of this policy for information about how to contact us.

Electronic Information, Privacy and the Internet

We use the internet, computers and e-mail as an integral part of our business to provide services to you. We administer a monitoring programme to ensure that our technology is managed appropriately including internet, intranet and network traffic. We aim to ensure that all data is free from viruses.

We provide a website for the benefit of members to allow them to easily manage their accounts (www.unisuper.com.au). Generally, any personal information that is collected from and managed via the website is collected and managed in the same manner as other personal information. However, there are some additional features of the website that are slightly different. These are as follows:

...➤ **MemberOnline:** We allow you to access and update personal information for your account on MemberOnline. To log-in, you will be required to enter a user name and password. Your user name and password will protect your personal information from unauthorised access and use. You must not disclose your user name and password to any other person.

If you click on a link in our website that leads you to another organisation’s website, UniSuper will cease to be responsible for the privacy or security of any personal information that you may provide to the operator of the linked site. You should check with the linked site’s operator as to its policies on privacy before providing them with your personal information.

...➤ **Cookies:** We may use technology to track the patterns of behaviour of visitors to our site. This can include using a “cookie”, which would be stored on your browser. This is collected for the purpose of improving the usefulness and usability of the site. You can usually modify your browser to prevent this from happening.

Technology, Risk and our Control Framework

HOW DOES UNISUPER MAINTAIN THE QUALITY OF PERSONAL INFORMATION?

We take reasonable steps to ensure that our information about you is accurate, complete and up-to-date. UniSuper encourages you to advise us immediately of any changes to your personal information, especially if it may affect your benefits directly (e.g. changes to your name, address or nominated beneficiaries).

SECURITY AND STORAGE OF PERSONAL INFORMATION

We are committed to protecting the personal information we hold about you. UniSuper takes all reasonable steps to protect your personal information, including the use of encryption technology. We take all reasonable steps to ensure your information is secure from loss, interference, modification, misuse, unauthorized access and disclosure. Our systems are subject to regular audit, and are maintained based on appropriate industry guidelines. UniSuper ensures that all information is backed up and stored securely in a remote location. All access to personal information is by authorised staff only and is carefully monitored.

Responding to Complaints and Inquiries

UniSuper has a complaints handling and inquiries team and processes in place to ensure that we deal with complaints and questions from members, employers, and the general public.

Access and Correction to Personal Information

UniSuper will provide you with copies of current personal information held about you upon request. Please see the details at the end of this policy for information about how to contact UniSuper.

Sometimes, UniSuper may refuse to provide you with access to your personal information, e.g. where it would be unlawful or may pose a serious and imminent threat to someone's health. In some instances UniSuper is unable to release information provided to it by a third party, for example a medical practitioner or another health consultant's report

or information provided by a third party entity. Where this occurs, UniSuper may refer you to the third party to access the information directly. In each of these cases, UniSuper will provide you with reasons for the refusal.

If you believe your personal information is not accurate, complete, or up-to-date, please contact us (see the Contact Us section for more information).

Amendment to the Privacy Policy

UniSuper may amend this Privacy Policy as required, and we encourage you to check the website for updates.

More Details and Further Queries

If you require more detailed information on a specific privacy issue or you have any concerns or complaints about UniSuper's collection, use or disclosure of your personal information, you can:

- ✦ Write to the: Privacy Officer, UniSuper, Level 1, 385 Bourke Street, Melbourne, VIC 3000; or
- ✦ E-mail us at enquiry@unisuper.com.au; or
- ✦ Call the UniSuper Helpline on **1800 331 685**
- ✦ For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website <http://www.oaic.gov.au>

This information is of a general nature only and includes general advice. It has been prepared without taking into account your individual objectives, financial situation or needs. Before making any decision in relation to your UniSuper membership, you should consider your personal circumstances, the relevant product disclosure statement for your membership category and whether to consult a licensed financial adviser.

This information is current as at March 2014 and is based on our understanding of legislation at that date. Information is subject to change. To the extent that this fact sheet contains information which is inconsistent with the UniSuper Trust Deed and Regulations (together the Trust Deed), the Trust Deed will prevail.

Issued by: UniSuper Management Pty Ltd ABN 91 006 961 799, AFSL No. 235907 on behalf of UniSuper Limited the trustee of UniSuper, Level 1, 385 Bourke Street, Melbourne Vic 3000.

Fund: UniSuper, ABN 91 385 943 850
Trustee: UniSuper Limited, ABN 54 006 027 121
Date: March 2014