



# Privacy Policy

**PF087**

## Policy Detail

<b>Policy Description</b>	This policy details how personal information is managed within UniSuper.
<b>Policy Applies to</b>	USL & USM
<b>Policy Owner</b>	Head of Governance & Policy, Chief Privacy Officer

## Policy Approval

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## 1. 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 Limited, trustee and UniSuper Management Pty Ltd<sup>1</sup>, the administrator and explains the way we manage and protect your information. These related entities share your information and work together to provide your membership benefits.

## 2. 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.

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. 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 personal information, and
- make a complaint regarding the handling of your personal information.

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

## 3. 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, tax file number, email address, employment details (including salary) and date of birth.

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, where you nominate a beneficiary or in relation to a claim.

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

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<sup>1</sup> UniSuper Limited ABN 54 006 027 121 (USL) is the trustee of the UniSuper superannuation fund ABN 91 385 943 850 (the Fund). UniSuper Management Pty Ltd ABN 91 006 961 799, Australian Financial Services Licence No. 235907 (USM) has been appointed by USL to administer the Fund. USM is also licensed to provide financial services to members, such as financial advice and related services. In this Policy, USL, USM and the Fund are referred to collectively as UniSuper.

information to provide trust and confidence that your information is managed securely.

#### **4. How is Personal Information Collected?**

UniSuper collects information directly from you at the time you become a member via the application form, over the phone or via our website. UniSuper also collects personal information through your employer when you first join UniSuper and while you are a member of the fund. This information may include your name, address, TFN, contact details and employment details.

#### **5. Why does UniSuper collect Personal Information?**

UniSuper only collects information from you if it is necessary to carry out our functions and activities. This is so we can establish your account, administer your account(s), ensure you are eligible for insurance cover, provide you with the benefits of membership, verify your identity and 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.

UniSuper collects and holds your Tax File Number (TFN) for approved purposes under superannuation and taxation law.

#### **6. 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, as set out above.

UniSuper may also use your personal information to undertake activities for a purpose related to the above.

#### **7. 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 administer your account, deliver our services, provide products and provide your benefits to you or to your beneficiaries. 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 in some other way. 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.

## 8. 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.

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.

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 administer your account effectively, 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 relevant law and in accordance with the following principles:

- 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, such as your treating doctor. 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 a 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 TFN. UniSuper will not use or disclose this information other than when required or authorised by law.

### ➤ Additional Information when making a Claim

UniSuper may require additional information when you make a claim for a benefit (for example, a total and permanent disablement benefit). We use this information to ensure that you are entitled to benefits and can better assess your claim. Under these circumstances, we will explain the reasons we require the information and provide you with further information regarding the purposes for which the information is required.

## **9. 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.

In accordance with our policy, no personal information is destroyed or de-identified if it relates to an existing or anticipated legal proceedings.

## **10. 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 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 and provide you with appropriate products.

## **11. 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 third parties on contractual terms and ensure that they hold, use and disclose your personal information in accordance with the Privacy Act.

UniSuper also engages with your employer and may disclose your personal information to your employer in order to verify your contributions and employment details, provide you with benefits and administer your superannuation benefits.

Where required under relevant law, UniSuper will disclose your personal information to government agencies (such as the Australian Taxation Office) and a regulator such as the Australian Prudential Regulation Authority or the Australian Securities and Investments Commission.

➤ **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. The countries to which your personal information may be transferred are currently Japan, Canada and USA<sup>2</sup> and additional countries may be added to this list in future.

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.

## 12. 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.

## 13. 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 facilitate account management ([www.unisuper.com.au](http://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.

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<sup>2</sup> The Privacy Act requires that we disclose the countries that we may disclose personal information to, for example, where service providers have cloud data storage offshore.

- **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.
- **Verification of identity:** Sometimes we may use your personal information you provide to UniSuper in order to verify your identity via an online electronic service. We will only use your personal information in such a way if we have obtained your consent to do so.

#### **14. 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.

#### **15. Complaints and Inquiries**

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

We appreciate that sometimes inquiries regarding your personal information may not be resolved to your satisfaction or may need further investigation. If this is the case you can make a formal complaint regarding a privacy matter.

To make a complaint regarding a privacy matter you can write to us at:

**Complaints Officer  
UniSuper  
Level 1, 385 Bourke Street  
Melbourne VIC 3000**

When we have received your complaint, we'll send you a confirmation letter. We will then attempt to resolve your complaint as quickly as we can. If you are not satisfied with the outcome of the complaint, you can refer your privacy complaint to the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au) or call them on 1300 363 992.



## **16. Data Breach Response**

We take the security of your personal information very seriously and take reasonable steps to protect your personal information and secure from loss, misuse, interference and unauthorised access. If an unforeseen event were to occur and UniSuper's data, including members' personal information was interfered with or accessed by unauthorised persons, UniSuper has in place a number of mechanisms to contain the breach and assess the impact.

If your personal information were to be accessed or interfered with by unauthorised persons, we would comply with any applicable legal obligations to notify you.

## **17. Access and Correction to Personal Information**

In order to keep the personal information we hold on record for you up to date, we ask that you let us know of any changes.

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 due to the following reasons (not exhaustive):

- where it would be unlawful
- may pose a serious and imminent threat to someone's health
- the information relates to existing or anticipated legal proceedings
- Giving access would have an unreasonable impact on the privacy of other individuals.

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 we are not able to provide you with access, we will notify you of the 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).

## **18. Amendment to the Privacy Policy**

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

## 19. Contact details

If you require more detailed information on a specific privacy issue or you have any concerns 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@unsuper.com.au](mailto:enquiry@unsuper.com.au); or

Call the UniSuper Helpline on **1800 331 685**  
between 8.30am and 6.00pm, Monday to Friday

For more information about privacy in general, you can visit the Office of the Australian Information Commissioner's website <http://www.oaic.gov.au>