

# IAG & NRMA Superannuation Pty Limited

## Privacy Policy

IAG & NRMA Superannuation Pty Limited (Trustee, us or we) acts as trustee of the IAG & NRMA Superannuation Plan (Plan). The Trustee has published this Privacy Policy in order to demonstrate how the Trustee is committed to the appropriate collection, use, disclosure, quality, security, access and correction of the personal information of members.

In the course of managing the Plan the Trustee is required to collect Personal and Sensitive Information in respect of members and their beneficiaries.

The Trustee is committed to ensuring the Privacy of the personal information it manages.

The Trustee is bound by the Australian Privacy Principles (APPs) which are privacy standards supporting the Privacy Act 1998 (Act). The APPs are legally binding principles which set out standards, rights and obligations in relation to collecting, handling, holding, accessing and correcting personal information.

## Types of personal information collected and held

In managing the Plan, the Trustee will collect both Personal Information and Sensitive Information where it is required for one or more of the activities or functions we undertake as the trustee of a superannuation fund.

### Personal Information

When used in this policy, the term 'personal information' has the meaning given to it in the Act. In general terms, personal information is information or an opinion that can be used to reasonably identify a person, whether the information or opinion is true or not.

This includes any information we collect from a person directly, or from a third party such as their employer, in order to offer a service or product. It may include, but is not limited to, name, address, date of birth, gender, contact details including email address, Tax File Number, occupation, relevant financial information and/or any additional information provided to us directly or indirectly through a website or via an adviser or a legal representative.

When collecting this information directly from an individual, we will inform them about the purpose of the collection and if the information is to be disclosed to any related companies. They will also be informed when the information that the Trustee is collecting is required by law. Where it is reasonable and practicable to do so, the Trustee will collect information about an individual only from them directly.

However, there may be circumstances where the Trustee collects information about an individual indirectly from third parties (including their employer) as it is more practical to do so. For example when transferring information from one fund administrator to another; when a member changes superannuation funds; or collecting information from an employer.

Personal information may also include 'sensitive information'.

### Sensitive information

Sensitive information includes information or an opinion about an individual's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional trade or association, membership of a trade union, sexual orientation or practices, criminal record, health information, genetic information or biometric information.

The Trustee will not collect sensitive information about a person without their consent unless it is required by Australian law, or other limited exemptions apply. The Trustee may collect health information about an individual if the information is reasonably necessary for the provision of a health service (e.g. insurance).

If an individual decides not to provide the Trustee with the information required, then we may not be able to provide, as it would otherwise have done, the services or program to them. Where the information not provided is health information, the non-provision of this information may limit or preclude the death or disability benefits available through the Plan.

## **How personal information is collected and held**

The Trustee collects information in the following ways:

- Electronically from employers;
- From individuals through the Plan website;
- From individuals directly via hardcopy or email correspondence; and
- From intermediaries such as financial planners or parents/guardians via hardcopy or email correspondence.

The Trustee stores information:

- Electronically on databases and other systems managed by the Plan's administration services provider;
- Electronically in files maintained by Plan Management; and
- In hardcopy format.

## **Purposes for which information is collected, held, used and disclosed**

The Trustee collects personal information about individuals where it is reasonably necessary for one or more of the activities or functions that the Trustee undertakes. Where it is reasonable and practicable to do so, the Trustee will collect the personal information from an individual directly.

We collect information in order to provide the following services and give individuals information about them:

- to manage an individual's superannuation benefits in the Plan; and
- for handling insurance claims, to manage and assess an individual's claim, and manage subsequent correspondence in relation to such claim.

If an individual does not provide the personal information requested, we may not be able to provide them with these services.

We may also use it to supply individuals with information about the other products and services offered by us.

We may also use personal information to:

- provide products, services or financial advice and information to individuals and to send communications requested by them;
- answer enquiries and provide information or advice about new or existing products or services;
- manage and assess insurance claims;
- provide access to protected areas of our website;
- for product or service development and research purposes;
- keep contact details up-to-date;
- investigate and respond to any complaint or subsequent correspondence; and

- comply with any law, rule, regulation, lawful and binding determination, decision or direction of a regulator, or in co-operation with any governmental authority of any country (where relevant).

We may disclose personal information to:

- outsourced service providers, contractors or other business support service providers for the purposes of the operation of our business, products and services such as administration, document storage warehouses, printing and mail houses, couriers, payment system operators, debt collectors and authorised professional advisers such as accountants, solicitors, and consultants;
- a financial adviser or other third-party authorised by an individual to access their personal information;
- our administration and data hosting service providers (and their related body corporate) who may be located or store data in other countries;
- insurers, claims assessors and investigators;
- other superannuation, pension and investment fund trustees or administrators should an individual transfer their investment to another fund; and
- as required by law, to government bodies such as the Australian Taxation Office (ATO) and the Australian Transaction Reports and Analysis Centre (AUSTRAC).

The Trustee is required to collect and use certain government related identifiers such as Tax File Numbers in managing the Plan. The Trustee is not permitted to and does not adopt government identity numbers as if it were its own identity number. The Trustee does not use or disclose government related identifiers in any way that is inconsistent with the purpose for which they were originally issued other than where it is required or authorised by or under an Australian law or a court/tribunal order.

## **Direct marketing**

From time to time, we will send out direct marketing material that is relevant to you as a member of the Plan. We may also use personal information we have collected from you for that purpose. These communications may be sent in various forms including mail, fax and electronic media such as email and SMS and social media such as Twitter and Facebook, in accordance with applicable marketing laws such as the *Spam Act 2003* (Cth). If an individual indicates a preference for a method of communication we will endeavour to use that method whenever practical to do so. In addition, at any time an individual may opt-out of receiving marketing communications from us by using the opt-out facilities provided within the marketing communications.

We do not share, sell, rent or disclose personal information to other organisations other than as described in this Privacy Policy.

## **Data security**

We place a high priority on the security of personal information, and we are committed to protecting the personal information that is provided to us. We take reasonable steps to ensure that personal information is secure and we use and maintain appropriate safeguards to prevent misuse and loss and from unauthorised access, modification or disclosure. We implement administrative, physical and technical safeguards to protect the confidentiality and integrity of personal information and data that we use and hold.

We will take reasonable steps to ensure that personal information is de-identified or destroyed when it is no longer required.

## Data Breaches

Should there be unauthorised access to customer personal information we will take the required steps to notify all affected parties as outlined in the requirements under the Notifiable Data Breaches (NDB) scheme under Part IIIIC of the Privacy Act 1988.

## Plan website

The Trustee has engaged a service provider to administer a website ([www.iagnrmasuper.com.au](http://www.iagnrmasuper.com.au)) with information for members of the Plan. The Trustee has entered into a contract with the Plan's website administrator to ensure that member personal information is handled in accordance with this Policy. Member information provided to us via the Plan's website is protected. The website administrator has put in place appropriate safeguards to prevent the unauthorised access, modification or disclosure of personal information. Controls are also in place to prevent the misuse, interference and loss of personal information. The administrator has implemented administrative, physical and technical safeguards to protect the confidentiality and integrity of personal information and data which may be transmitted via the internet. The Trustee monitors the performance of the website administrator and will take appropriate action in the event that any concerns are identified with the management of personal information of members.

The website administrator uses 'cookies' to store information provided by an individual's browser when they visit our website. This includes the date and time of the visit, the pages accessed and any documents downloaded. This enables us to keep track of products or services viewed so that, unless an individual has opted out, we can send them news about those products or services. We also use cookies to measure demographic usage patterns to determine which areas of our website have been visited and to improve our services.

Our website may contain links to other websites operated by third parties. We make no representations or warranties in relation to the privacy practices of any third party website and we are not responsible for the privacy policies or the content of any third party website. Third party websites are responsible for informing individuals about their own privacy practices.

## Access to and correction of information

The Trustee aims to ensure that the personal information we hold about individuals is accurate, up-to-date, complete, relevant and not misleading. We will take reasonable steps to ensure the quality of personal information at two distinct points in the information handling process: collection and use or disclosure.

If an individual advises us that the information that we hold about them is not accurate, up-to-date or complete, we will take reasonable steps to correct the information. Members can access or correct their personal information by contacting the Fund Administrator directly via the Helpline. Otherwise members may request access to their personal information by contacting the Trustee's Privacy Officer. The Privacy Officer will need to establish the identity of the individual requesting the information prior to providing it. The Trustee will respond in a timely manner to an individual's request to correct personal information. The Trustee will not charge the individual for making a request to correct personal information.

The Trustee may refuse the request to correct the personal information, in these instances; the Trustee will give a written notice including reasons for the refusal and the complaint mechanism available.

There are a number of situations where the Trustee may deny an individual access to personal information. These can include circumstances where it would have an unreasonable impact on the privacy of other individuals, the information relates to existing or anticipated legal proceedings, we have reason to suspect that unlawful activity or misconduct of a serious nature is being or may be engaged in, or where the law requires or authorises such access to be denied. Where the Trustee refuses to give access, or to give access in the manner requested by the individual, the Trustee will give the individual

notice setting out (where reasonable) the reasons for the refusal, the complaint mechanism available to the individual and any other matters prescribed by Privacy Law.

The Trustee understands that anonymity and pseudonymity are important elements of privacy and that an individual may wish to have the option of not identifying themselves, or of using a pseudonym when dealing with us. Where it is possible and in limited circumstances, the Trustee will allow an individual the opportunity to remain anonymous or to use a pseudonym when dealing with us unless we are required or authorised by or under an Australian law, court or tribunal order to require individuals to identify themselves or it is impracticable for us to deal with individuals who have not identified themselves or used a pseudonym.

Please note, however, that many of our products or services require us to obtain personal information. Should an individual refuse to provide identifying information we may not be able to provide products or services to them.

## Contact details and complaints handling

If an individual has any questions about this Privacy Policy, or would like to know more about our personal information principles, or if they have any concerns or would like to make a complaint regarding the treatment of their personal information, they can contact the Trustee's Privacy Officer at:

The Privacy Officer  
IAG & NRMA Superannuation Plan  
Level 13, Tower Two  
Darling Park  
201 Sussex Street  
SYDNEY NSW 2000

The Trustee treats any concern or complaint that an individual may have with respect and confidentiality. The Privacy Officer will contact the individual within a reasonable time after receipt of their complaint to discuss their concerns and outline options regarding how they may be resolved. The Trustee will aim to ensure that the complaint is resolved in a timely and appropriate manner.

If the matter is not resolved to the individual's satisfaction or they would like further information in regards to the Act, the matter can be referred to the Office of the Australian Information Commissioner on 1300 363 992.

The Privacy Officer will provide a member with a hard or soft copy of this Privacy Policy free of charge, on request. This can be requested by contacting the Helpline on 1300 424 676.

## Disclosure to overseas parties

The Trustee uses service providers in relation to the administration of the Plan, that utilise overseas based subsidiaries to assist with maintaining member's superannuation records. In particular, the Trustee has engaged Mercer Outsourcing (Australia) Pty Ltd who utilises the Mercer Global Operations Shared Services (GOSS) facility based in India to perform administration processing functions.

The Trustee will take reasonable steps to ensure that the overseas recipients of personal information do not breach the privacy obligations relating to personal information. This will include ensuring that any service providers conduct appropriate due-diligence on any sub-contracted service providers to ensure they manage personal information in accordance with Privacy Law.

## Known overseas recipients

The Trustee is aware that personal information is disclosed overseas in the following locations:

<b>Country</b>	<b>Company</b>	<b>Data type/details</b>
India	Mercer – GOSS facility	Administration records for all members of the Plan.
United States	Marsh & McLennan Companies (Mercer parent)	Mercer Connect – a file sharing system used to make electronic files available with Mercer and to Plan Management

## Changes to this policy

The Trustee may change this policy from time to time as required. Individuals should check the Plan website for the latest version of this policy.

This policy was approved by the Trustee on 7 March 2018