

# NGS SUPER PRIVACY POLICY

POLICY DOCUMENT

AS AT 20 NOVEMBER 2018

At NGS Super, we take protecting your privacy very seriously. As part of our commitment to protect your personal information to the highest standard, we have policies in place that we follow when we manage and use your information.

## Protecting members' information

NGS Super Pty Limited (the Trustee) has adopted a privacy policy to ensure we handle private and sensitive information about you or anyone authorised by you to act on your behalf responsibly, and that individuals dealing with us are confident that we respect their personal information and do not breach their privacy when handling this information. This policy explains how we deal with personal information that is collected in order to provide products and services to members of NGS Super (the Fund).

The Trustee abides by the Australian Privacy Principles (APPs) under the Privacy Act 1988 (Cth) (Act). In accordance with the Act we only collect information that is required to manage members' superannuation benefits.

We may review and make changes to this Policy from time to time to keep up to date with changes in the law. If any changes are made, we will manage your personal details in line with the updated Policy.

## What kind of information do we collect and why?

We will only collect and hold *personal* information that is necessary to establish and administer one or more membership accounts and provide services to you.

This includes:

- name
- address
- date of birth
- contact details including telephone and email
- gender
- occupation
- Tax File Number
- salary in some circumstances
- health information relevant to insurance products
- beneficiary information
- relevant financial information
- employment history
- any additional information relating to you that you provide to us directly or indirectly through our website including information arising from your online presence derived from 'cookies'.

# MAINTAINING YOUR PERSONAL RECORDS

This information is needed to maintain the Fund's records in a format that identifies you or anyone authorised by you to act on your behalf. These records are essential to the proper management of the Fund and to enable us to provide members with superannuation benefits and services.

We may also collect health information about you to enable us to obtain death or disability insurance cover from the Fund's insurer or to process a disability claim. We also hold information about your nominated beneficiaries.

## What is personal information?

Personal information in general terms is information or an opinion that can be used to reasonably identify you, whether the information or opinion is true or not. Personal information may also include *sensitive* information

## What is sensitive information?

Sensitive information includes information or opinions 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 or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information or genetic information.

Sensitive information will not be collected unless there has been consent to its collection, the collection is required by law or the collection is necessary for the establishment, exercise or defence of a legal claim.

Currently we only collect health information that relates to insurance product underwriting.

## How is my information collected?

Personal information is generally collected directly from you or through your employer, adviser, previous super fund, or other representative authorised by you.

Health information is collected from you or your employer, adviser, other insurer, or other representative authorised by you and is provided to us or to our insurers. If required, we obtain independent medical reports directly from your medical practitioner(s).

Where we collect your personal information from a third party, it is that third party's responsibility to notify you about the disclosure of your personal information to us.

In some instances you may provide us with personal information of other individuals (such as your nominated beneficiaries). If this happens, it is your responsibility to:

- tell these individuals that you have provided their details to NGS Super
- provide them with a copy of our Privacy Collection Statement and this Privacy Policy.

## Collection and notice of unolicited information

We must provide you with notice when it may not be obvious that personal information is being collected about you. This is referred to as unsolicited information. This can arise if you provide personal information to us which we are not reasonably required to collect, for example when you use the Fund's website to participate in surveys or by completing an online form, participate in social media forums or where information is collected over the phone. This may include the collection of information for either research or promotional purposes.

We may keep records of unsolicited personal information if the information is reasonably necessary for one or more of the Fund's activities. If not, it is our policy to destroy the unsolicited information or ensure that the information is de-identified, provided it is lawful and reasonable to do so.

## What happens if I don't provide the information you ask for?

If you decide not to provide us with the information needed or you do not allow a third party to provide us with that information, we may not be able to provide superannuation benefits or services to you.

Where the information is related to health information it may limit the level of death or disability benefits available through the Fund.

While you are not required by law to give us certain personal information such as your tax file number, we may have to withhold a higher level of tax from any payments paid by the Fund.

# SECURITY OF YOUR PERSONAL INFORMATION

## Security of your information

We place a high priority on the security of your personal information. Once your details have been recorded by our administrator, your original application is securely stored based on the following application method:

- paper applications are held at our administrator's document storage facility on our behalf
- online applications are stored within our secure electronic network.

Your information is protected from unauthorised access through the use of secure systems, user logons and passwords. The Fund's Administrator is required to maintain appropriate safeguards to prevent unauthorised access or use of personal information or data. Our Administrator is required to have a Privacy Policy that is consistent with the Australian Privacy Principles. All third party service providers are required to protect personal information in accordance with the privacy laws.

Where practical, personal information is de-identified or destroyed when it is no longer required.

If there has been unauthorised access, or disclosure of your personal information which is likely to result in *serious harm* to you, then we are required to notify you and the Privacy Commissioner and provide you with recommendations about the steps that you should take in response to this matter.

## Anonymity and pseudonymity

You may choose to remain anonymous or use a pseudonym when interacting with NGS Super, unless it is impracticable or unlawful for us to deal with you without you identifying yourself.

## How is your information used and when is it disclosed to others?

Information is collected for the primary purpose of establishing and administering a membership account and providing member services. In order to meet obligations and your needs, the Trustee outsources to other organisations. For this purpose personal information may be transferred to or handled by:

- the Fund's administrator and their associated companies that need the information to provide you with a service
- providers appointed by us to provide member services
- the Fund's auditors
- other superannuation and pension fund trustees or administrators should you transfer to another superannuation fund
- insurance brokers and/or insurers who provide death and disability and income protection cover to Fund members
- Government bodies such as the Australian Taxation Office and the Australian Transaction Reports and Analysis Centre (AUSTRAC)
- the Trustee's legal, market research and other professional advisers and
- other business support providers, including document storage printing and collating companies.

Should you become a member of another super fund, your personal information may be transferred to that fund. Further, your employer may be provided with your personal information to facilitate provision of benefits in the ordinary course of your employment.

We are also bound by legal obligations of confidentiality which apply to trustees of super funds. We do not sell or rent out any of the information we hold on members of the Fund and protect the security of that information in accordance with regulatory requirements and industry practice.

## Overseas disclosure of personal information

Information may be disclosed to providers outside Australia who provide services directly or via an outsourced arrangement with an existing provider. Information is only provided to enable the provider to provide the Fund's products and services, such as administration, document storage and data hosting. All steps are taken via contractual arrangements to ensure adherence to the privacy principles.

Currently, personal information may be disclosed overseas as follows:

- i) Mercer (the Fund's administrator) may transfer information to other countries including New Zealand, the United States and India. A current list of countries can be found in Mercer's privacy policy at [www.mercer.com.au/privacy.html](http://www.mercer.com.au/privacy.html)
- ii) Salesforce (a customer database hosted in the US) collects your personal information when you join the Fund and when you subsequently make contact with NGS Super and/or NGS Financial Planning. Salesforce has a privacy framework which is aligned to the Privacy Act and Australian Privacy Principles and which can be found at: [www.salesforce.com/au/company/privacy/](http://www.salesforce.com/au/company/privacy/)

# ACCESSING YOUR PERSONAL INFORMATION

- iii) Bond Street Custodians Limited (BSCL) are used to provide some services associated with our NGS Self-Managed (Direct Investment) option. BSCL are a part of the "Macquarie" group of companies and as such are associated with other Macquarie entities. There may be instances where your personal information may transfer to other Macquarie Offices in other countries. A list of these countries can be found in Macquarie's privacy policy [www.macquarie.com/au/about/disclosures/privacy-and-cookies](http://www.macquarie.com/au/about/disclosures/privacy-and-cookies)
- iv) Calendly is an online event tool which we use to manage individual appointments with members when we visit participating schools. Calendly collects your name, email address and contact number. This service is hosted in the US. Calendly's privacy policy is available at: [www.calendly.com/pages/privacy](http://www.calendly.com/pages/privacy)

## Can I amend my personal information?

We will take reasonable steps to ensure your personal information is accurate, up to date and complete. The accuracy of your information depends to a large extent on the information you provide. If you do not give us all the personal information that we may require, or if the personal information you provide is inaccurate or incomplete, then the products, services and information we provide to you may be affected.

If you think there is something wrong with the information we hold about you, please contact us to:

- let us know if there are any errors; and
- keep us up-to-date with any changes.

We will respond to your request to correct your personal information free of charge and in a reasonable period of time. If we refuse your request, we will provide you with a written notice setting out the reasons for the refusal and mechanisms available to complain about the refusal.

If we refuse to correct your personal information, you may request that NGS Super associate your information with a statement that the information is inaccurate, out of date, incomplete, irrelevant or misleading. We will take reasonable steps to make the statement visible to users of your personal information.

If we do correct your personal information and we have previously disclosed your personal information to a third party, upon your request, we will notify that third party of the correction unless it is impracticable or unlawful to do so.

## Can I access my personal information?

You can view your account online at [www.ngssuper.com.au/login](http://www.ngssuper.com.au/login) by using your NGS Super membership number and PIN. You can also access your personal information by contacting the Fund's Privacy Officer.

In some instances, there may be legal or administrative reasons where we may deny or decline your request, in which case we'll let you know the reasons why. These include circumstances where such information is used in confidential Trustee decisions or in a commercially sensitive decision-making process, where the privacy of others may be breached if the information was accessed or where the law requires or authorises such access to be denied. The Fund's Privacy Officer will advise if any of these circumstances apply.

# COLLECTION OF PERSONAL INFORMATION

## How is my personal information collected online?

The information we collect about you depends on how you use our website. When you use our website, you consent to the use of cookies and those cookies collect information on how you use our website. Cookies are small text files that may be stored on your computer when you access our website. They are used for a range of purposes, including security and personalising services.

If you visit an unsecured area of our website (an area where you aren't required to log in) to read or download information, the only information recorded by us will be the date and time of your visit to the site, the pages viewed, the operating system in use, your geo-location and any information downloaded. We won't record information that allows us to identify you, unless you provide your personal information via a web-based form.

The secure pages (where you log in) on our website uses cookies to provide secure, personalised services. This includes Member Online which allows you to manage your super online. When you log in to Member Online, there are Terms and Conditions including some that relate to privacy and security.

We use cookies to:

- make our websites easier to use
- store your user preferences
- track usage by using third party service providers to collect information about how our websites are accessed and used. We use this information to improve our website layout, content and services
- provide you with targeted content or advertising once you leave our websites through the use of third party cookies that are sent to your computer when you use our websites. These cookies collect information about your website usage and send it to a third party ad server which may be offshore. The server uses that information to deliver targeted advertising to you when you visit third party websites that display ads associated with the third party service provider. The cookies may also gather information that may allow us to identify you.

Our website has links to other internet sites. Once you leave our website, the guidelines of this privacy policy no longer apply. Please read carefully the relevant privacy policies or terms and conditions governing these linked sites to ensure your privacy is protected.

Third party cookies are also used on our website including the following:

- Flash cookies are used by Adobe Systems Incorporated to track settings and information on how visitors use the Adobe Flash application
- Double Click Advertising cookie is used to track delivery of banner advertisements and which advertisements have been displayed to a particular user
- Media-Server.com is a Flash cookie to track video views and player settings for the Media-Server Flash video player
- YouTube.com tracks information on the video and browser settings of visitors
- Facebook pixel is used to report conversions, build audiences and get rich insights about how visitors use our website.

Most internet browsers allow you to accept or block cookies, but if you block cookies you may not be able to use some of the features on our website.

Cookies that you accept can be deleted in two ways:

- i) automatically when they expire, or
- ii) by manually deleting them through your internet browser.

To find out how to opt out of Google's use of cookies, visit the **Google Ads Preferences Manager**. To find out how you can opt out of a third party vendor's use of cookies, visit the **Networking Advertising Initiative** opt out page.

## You may receive direct marketing information from us

We may send you direct marketing communication and information about products and services that are offered and of relevance to Fund members. Member communication may be via various methods including mail, telephone, fax and electronic media such as email, SMS and social media. Where a preferred method of communication has been indicated, where practical we will try to use that method.

If you do not wish to receive information, or previously indicated that you would like to and have now changed your mind, you can log-in to your member online account, and select the *Personal details* tab at the top of the page. From here you can change your communication preferences, otherwise you can click the unsubscribe link within the email you receive.

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

## How do I make a complaint about the way my information has been collected, used or disclosed?

If you believe we haven't dealt with your personal information in accordance with privacy law, you can make a complaint to us. You will need to give us the full details of your complaint and your contact details.

To make a privacy complaint call us on **1300 133 177** or send a written complaint to:

**Privacy Officer  
NGS Super  
PO Box 21236  
World Square NSW 2002**

You can also contact us via the **contact us** page at **[www.ngssuper.com.au](http://www.ngssuper.com.au)**

You can find out more information about the Privacy Act and the Australian Privacy Principles from the Office of the Australian Information Commissioner (OAIC). The OAIC may be contacted at **[www.oaic.gov.au](http://www.oaic.gov.au)**, by email at **[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)** or by phone at 1300 363 992.

A copy of the Fund's complaints procedures is available by calling our Customer Service Team or by email at **[www.ngssuper.com.au/contact-us](http://www.ngssuper.com.au/contact-us)**

## Need some help?

If you have any questions about this Policy or your privacy, you can call us on **1300 133 177** or visit our website at **[www.ngssuper.com.au](http://www.ngssuper.com.au)**

You can also contact our Privacy Officer.

Updated 20 November 2018.

## More information?

### Contact us

Our website is your one-stop shop for information about NGS Super.

You can also contact us at **[www.ngssuper.com.au/contact-us](http://www.ngssuper.com.au/contact-us)** or call our Customer Service Team on **1300 133 177** between 8.00am and 8.00pm (AEST or AEDT), Monday to Friday.

### Important information

The information in this article is general information only and does not take into account your objectives, financial situation or needs. Before making a financial decision, please assess the appropriateness of the information to your individual circumstances and consider seeking independent advice from a licensed or appropriately authorised financial planner.

**[www.ngssuper.com.au](http://www.ngssuper.com.au)**  
**1300 133 177**