

Privacy Statement

At NGS Super, we take protecting your privacy 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 customers' information

NGS Super Pty Limited (the Trustee) has adopted a privacy statement 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 statement 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 as required under the Privacy Act 1988 and we only collect information that is required to manage your superannuation benefits. We may review and make changes to this Statement 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 Statement.

References throughout this Privacy Statement to "members" may in some situations mean non-members, for instance, when you are browsing our website or applying to become a member.

What kind of information do we collect and why?

Generally, we will only collect and hold personal information that is necessary to provide financial planning services to you or to assist in establishing a membership account with NGS Super. This includes:

- name
- address
- date of birth
- contact details including telephone and email
- gender
- your marital status and details about your family and living arrangements
- Tax File Number
- health information relevant to insurance products
- beneficiary information
- employment details
- your assets, income and liabilities
- 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'.

This information is needed to maintain our 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 your records and to enable us to provide you with financial planning services.

We may also collect limited health information about you to enable us to apply for death or disability insurance cover on your behalf. We may also hold information about your nominated beneficiaries.

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:

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

Personal information including health information is held and stored by us and/or our administrator. Our insurers will also hold and store personal and health information in accordance with their own privacy policy.

For non-members, we will only collect the personal information necessary for us to provide the relevant service or information that you require from us. For example, if you attend an NGS Super event, we may collect the following kinds of personal information from you so that we can manage your attendance at the event: your name, address, email address and phone number.

Collection and notice of unsolicited 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, 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.

The information provided by your computer when you use this website is collected by NGS Super. For example, your browser type, IP address (the electronic addresses of computers connected to the internet), referring site and the date and time. The purpose for collecting this information is to maintain the security of the website and for operating and improving the software. We collect IP addresses to assist in analysing trends, administering our website and gathering broad demographic information. For more details about use of IP addresses, see subparagraph vii) on page 6.

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 deidentified, 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.

If you submit incomplete or inaccurate information to our insurers, they may not be able to provide you with the insurance cover you are seeking or complete their assessment of your insurance-related matters.

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 Office of the Australian Information Commissioner and provide you with recommendations about the steps that you should take in response to this matter.

The security of your information also requires you to take specific measures to protect your personal information available via **Member Online** account against unauthorised access or use.

This includes:

- ensuring that you do not divulge your password or PIN to any one
- ensuring that your access codes and passwords are kept secure.
- notifying us immediately if you believe that your access codes, password or PIN have been compromised.

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?

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, your personal information may be transferred to or handled by:

- the Fund's administrator (Mercer Outsourcing (Australia) Pty Ltd) and their associated companies that need the information to provide you with a service
- providers appointed by us to provide member services such as web hosting companies, web and application developers, online calculator providers, direct investment platform providers
- your employer to facilitate provision of benefits in the ordinary course of your employment
- the Fund's auditors
- other superannuation and pension fund trustees or administrators should you transfer to another superannuation fund
- insurers (including TAL Life limited) who provide death, disability and income protection cover to Fund members, medical practitioners, claims assessors and investigators
- your financial adviser or other thirdparty appointed by you
- Government or regulatory bodies/ authorities such as the
- Australian Taxation Office (ATO), the Office of the Australian Information Commissioner (OAIC) and the Australian Transaction Reports and Analysis Centre (AUSTRAC)
- Courts or Tribunals for the purposes of managing and resolving complaints
- the Trustee's legal, market research and other professional advisers and
- other business support providers, including mail houses, document storage, printing and collating companies.

Who do we share your personal information with?

We will only share your personal information to our third party providers (as discussed in the section above) on specific matters if you have consented to the disclosure.

Where you provide your personal details for the purpose of online identification verification, our third party service provider will use your details for this purpose. Your information will be subject to an information match request in relation to relevant official record holder information and a corresponding information match result will be provided via the use of third party systems.

If you die while you are an NGS Super member, we may share details about your super and insurance with your dependants and legal personal representative (which means the executor or administrator of your estate) as appropriate. The information we share may include the names of your nominated beneficiaries, your account balance and any insurance amount payable.

Overseas Disclosure of Personal Information

In the event that you claim an insurance benefit for either Life and Disability or Income Protection:

- the relevant insurer may collect personal information from or about you and may provide your personal information to us and our administrator, to assist with the assessment and administration of your insurance claim
- our insurers may also pass information to claims investigators, medical practitioners, reinsurers, insurance reference bureaus and certain organisations to whom they outsource some functions. This will be set out in the relevant insurer's privacy statement.

If your insurance claim is declined and you take legal action or complain to an external dispute resolution body, NGS Super and our service providers must, on request, provide your personal details and information about your health to our legal representatives, the insurer, officers of the Australian Financial Complaints Authority (AFCA) and Court officials.

We are also bound by legal obligations of confidentiality. We do not sell or rent out any of the information we hold on members of the Fund and we 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 mercerc.com.au/privacy.html
- ii). Salesforce (a customer database hosted on servers in the US and Japan) 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: salesforce.com/au/company/privacy/

- iii). Calendly is an online event tool which we use to manage individual appointments with members when we visit participating employers. Calendly collects your name, email address and contact number. This service is hosted in the US. Calendly's privacy policy is available at: calendly.com/pages/privacy
- iv). Kentico is a digital content management system and email marketing system (including SendGrid). Both Kentico and SendGrid services are hosted in the US. Privacy policies for each are available at: kentico.com/privacy-policy
twilio.com/legal/privacy#sendgrid-services
- v). Zoom is a teleconferencing software program developed by Zoom Video Communications. Zoom webinar recordings and data may be transferred or stored in the United States as well as in other countries outside of the EEA, Switzerland, and the UK. Such countries may have data protection rules that are different and less protective than those of Australia. Zoom's privacy policy is available at: explore.zoom.us/docs/en-us/privacy.html
- vi). We use Intercom for our website chatbot. Chatbots are often called virtual agents or virtual assistants and are used in place of a human to conduct specific tasks or provide information based on written or spoken requests. The data collected by our website chatbot is hosted on US-based servers. Intercom's privacy policy can be found at: intercom.com/legal/privacy
- vii). Our website also uses Google Analytics, a service which transmits website traffic data to Google servers in the United States. We use Google Analytics in order to understand how users engage with our website. Data transmitted includes, for example, the web address of the page that you're visiting and your IP address. Google may also set cookies on your browser, or read cookies that are already there. Google may transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. More information about how Google Analytics collects and processes data is described in Google's Privacy Policy. If you don't want Google Analytics to be used in your browser, you can use the opt-out service provided by Google or the 'incognito' mode in your browser.

Accessing your personal information

Can I amend and access my personal information?

In order to keep your personal information as current as possible, we ask that you let us know of any changes.

We will respond to your request to correct your personal information free of charge and in a reasonable period of time. You can view your account online at 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 circumstances, we may not be able to allow you access to your personal information, for example where:

- giving access would have an unreasonable impact on the privacy of other individuals
- the information relates to existing or anticipated legal proceedings
- giving access would be against the law
- the information would reveal our commercially sensitive decision making process.

If we refuse your request, we will provide you with a written notice setting out the reasons for the refusal and the complaint mechanism available to you.

How is my personal information collected online?

The information we collect about you depends on how you use our website.

We use cookies on the unsecured pages of our website (where log-ins are not required) to obtain information regarding the use of the website and to deliver relevant information to you. By using the website you agree to NGS Super's use of technology of this type. You can configure your preferences and options in your browser to reject all cookies, however this means you may be unable to view secure pages of the website.


We also use cookies for analytical purposes. These cookies gather visitor behavioural information for analytical purposes. This information is not used to track a visitor, but is instead reported in aggregate to ensure the information delivered to a person via our website is relevant to the person accessing it. If the visitor is registered as a member and logs into the secure pages of the website or our mobile App an identification number is collected for internal analytical purposes only.

The secure pages (where you log in) on our website uses cookies to provide secure, personalised services. This includes **Member Online**. When you log in to **Member Online**, there are Terms and Conditions including some that relate to privacy and security. To find out how to opt out of Google's use of cookies, visit the Google Ads Preferences Manager.

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 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 call us to have this changed. For NGS Super members, you can log-in to your **Member Online** account, and select the  icon at the top of the page. By selecting the Personal Details option, 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 statement.

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 Financial Planning
PO Box 21236
WORLD SQUARE NSW 2002

You can also contact us via the contact us page at ngssuper.com.au/contactus

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 oaic.gov.au, by filling out the Enquiry or Privacy Complaint form at oaic.gov.au/about-us/contact-us or by phone at **1300 363 992**.

A copy of our complaints process is available at ngssuper.com.au/contactus

Talk to us - we're here to help

You can contact us at ngssuper.com.au/contact-us

Call us on **1300 133 177**, Monday to Friday, 8am–8pm (AEST/AEDT)

Postal address: **GPO Box 4303 Melbourne VIC 3001**

ngssuper.com.au

The information in this statement 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 professional advice.