
Privacy Policy

My Super Future Pty Ltd
ABN 38 122 977 888
AFSL 411440

1.0 Objective and Requirements

My Super Future Pty Ltd (MSF) is committed to the protection of the information that it holds about you. This policy sets out the processes that MSF has in place to protect your information. This policy covers the collection, use, disclosure and security of your information. It also explains how you can access and correct information that we hold about you and how you may make enquiries or complaints about how we manage the information that we hold about you.

2.0 Scope and Responsibilities

All representatives of MSF (which include employees, contractors, temporary staff, authorised and non-authorised representatives) are required to comply with this policy.

This policy is intended to meet the needs of the MSF client base which primarily consists of members of industry superannuation funds with which MSF has contractual arrangements (e.g. QIEC Super and Club Super), as well as private clients who may not be members of these funds, existing and prospective representatives of MSF and members of the general public visiting the MSF website.

The General Manager (GM) of MSF holds ultimate responsibility for ensuring that the requirements set out in section 1.0 of this policy are met. The management of this policy itself is to be carried out by the Team Leader, Operations (TLO) in consultation with the GM.

3.0 Legislative Obligations

MSF is required to comply with the requirements of the *Privacy Act 1988* (Privacy Act), which provides a legislative framework governing the management of personal information held. Specifically, MSF is required to comply with the Australian Privacy Principles (APPs). The APPs are a set of rules that organisations must comply with in managing personal information about individuals.

4.0 Availability of Privacy Policy

This Privacy Policy is publicly available on the MSF website at www.mysuperfuture.com.au. A copy of the Privacy Policy may also be requested, free of charge, and will be issued within seven days of the request. To request a copy of the Privacy Policy you can contact MSF on (07) 3238 1485.

5.0 Personal Information That We Hold and Why We Collect It

MSF will only collect information about you where it is fair and lawful to do so. When we collect information from a person or organisation other than yourself, it is usually done because we are required to do it and it will only be with your written consent. We will not collect information about you in an unreasonably intrusive manner.

From time to time we may receive unsolicited information from you. If this occurs we will:

- Consider if we can collect it.
- If we can collect it, we will ensure it is secured.

You have the right to anonymity or the use of a pseudonym when dealing with us. However, if you request anonymity, we will not be able to disclose or discuss personal information we hold in relation to you, as personal identification is required to access personal information.

5.1 Client Base

We collect personal information about you in order to provide recommendations that meet your goals and needs. Without gathering this information, any recommendations may not meet your goals and needs and therefore may not be suitable for you.

The types of information that we collect about you are your name, contact details, tax file number, gender, date of birth, occupation, income, expenses, assets, liabilities, insurance details and estate planning details.

With your consent, we may collect information about you from yourself, another superannuation fund or investment manager, Centrelink or other service providers.

We will collect information from you by completing a Client Fact Find document, by having you sign an Authority to Disclose Information form or collecting copies of documents from you. We may also obtain personal information from you for the completion of insurance quotes or insurance applications.

5.2 Members of General Public

MSF may collect information relating to you that you provide to us directly through our website or indirectly through the use of our websites or online presence such as 'cookies'.

6.0 Personal Information and How We Use and Disclose It

MSF will not use your personal information for direct marketing by third party entities. We will also not disclose information about you to other organisations for their marketing purposes. MSF may disclose information to a third party in the following circumstances:

- We are required by legislation.
- We are required by a court order.
- For enforcement related activities.

If we use or disclose your personal information for enforcement related activities, we will make a written record of this.

6.1 Client Base

We will only use and disclose the information we hold about you for the following purposes (primary purpose):

- Preparing personal financial recommendations for you.
- Mailing information to you.
- Archiving information held about you.
- Audit requirements.
- Conducting customer satisfaction surveys.
- To help us continually improve the services that we offer.

We may also use or disclose your information for the following purposes (secondary purpose) as ASIC legislation requires us to:

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- Pass information to another Financial Planner in the event of a request from you to do so.
- Regulator reporting as required by legislation.
- Provide information to the Australian Financial Complaints Authority or the courts in relation to a complaint.

All of these organisations require appropriate Privacy Policies and systems in place.

We will only use your personal information for direct marketing under the following circumstances:

- For a service that relates to your financial planning needs.
- For a service that may benefit you as a client of MSF.

We may use your personal information to let you know about third party products and services that may be of interest to you. We will only do this if you have provided your consent. You may request at any time to not

receive direct marketing communications from us. If you make such a request, we will not charge you for the making of or given effect to your request.

6.2 Members of General Public

We will only use and disclose the information we hold about you for the following purposes (primary purpose):

- To respond to an online enquiry sent to us via our website.

7.0 Data Quality

MSF will ensure that the information that we hold about you is accurate, complete and up to date.

7.1 Client Base

MSF will review your personal details each time we meet or speak with you.

8.0 Data Security

MSF will ensure that the information that we hold about you is secure and is protected from misuse, interference and loss, or from unauthorised access, modification or disclosure.

We will do this by ensuring comprehensive policies and controls are in place relating to data security. This includes both comprehensive IT security arrangements as well as appropriate physical security arrangements such as the locking away of physical files in secure compactus.

If MSF has determined that we no longer need information about you, we will either securely archive or destroy the information, depending on the circumstances or policy to which the information relates. We will however, keep information for certain time periods as required by law.

9.0 Eligible Data Breach Notifications

Where MSF becomes aware of a breach of data security (ie. unauthorised disclosure, access or loss), it will implement processes to assess the impact of the data breach.

In accordance with the requirements of the privacy regulations, MSF will notify eligible data breaches to the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable after MSF becomes aware that there are reasonable grounds to believe that there has been an eligible data breach.

10.0 Access and Correction of Information

You are entitled to access the information that MSF holds about you. If you want to check that your personal details are correct or to see what personal information MSF holds about you, you may request access to this information at any time. Requests for information may be made in person, via the phone or via email. A copy of the requested information can be sent by post or email.

For security reasons, MSF will not give any information over the phone unless the person making the enquiry is able to answer appropriate security questions to confirm their identity. Written requests for information must be signed by you.

MSF is not obliged to give you certain information if it:

- Is confidential.
- Relates to another person.

If you request access, MSF must respond to your request within a reasonable period (30 days) after you make the request. MSF will endeavour to respond to such requests at the earliest opportunity. We must give you access in the manner you request, except where it is unreasonable or impracticable to do so.

The APP regime provides that requests for access to personal information may be denied in limited circumstances. If MSF refuses access (for example, giving access would have an unreasonable impact on the privacy of other individuals), we must advise in writing of:

- the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so, and
- the mechanisms available to complain about the refusal, and
- any other matters prescribed by the regulations.

MSF will not charge you a fee for making a request or accessing information held about you.

MSF may correct the information we hold about you if we believe it is inaccurate, out of date, incomplete, irrelevant or misleading. We will do this by applying internal procedures to update information. If MSF corrects information that we hold that we have also given to a third party (under approved means), if you request it, we can also ask that entity to correct the information held about you.

The APP regime provides that MSF may refuse to correct the information we hold about you in limited circumstances. If we do that, we will advise you of:

- the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so, and
- the mechanisms available to complain about the refusal, and
- any other matters prescribed by the regulations.

If MSF refuses to correct, you have the right to ask us to associate with the information a statement that you believe the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. MSF must then take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

MSF must respond to your request within a reasonable period (30 days) and we will not charge you for the making of the request, correcting the personal information or for associating the statement with the personal information. MSF will endeavour to respond to such requests at the earliest opportunity.

11.0 Complaints Policy

MSF takes complaints about privacy breaches seriously. We have established an internal Complaints Policy which will consider any complaints made about breaches of privacy and attempt to resolve them promptly.

Complaints can be made to MSF via email to admin@mysuperfuture.com.au, via phone to (07) 3238 1485, via letter to PO Box 10478, Brisbane, QLD, 4000, verbally in person or via an Engaged Marketing NPS survey response.

MSF will address your concerns and try to resolve them quickly. MSF aims to resolve any complaints as soon as possible but no longer than 45 days from the time of receipt.

If you are dissatisfied with our handling of your complaint or the final decision, you may contact the Australian Financial Complaints Authority (AFCA). AFCA is an external dispute handling body that assists consumers and financial service providers to resolve disputes that cannot be resolved directly. They are independent, impartial and offer an accessible alternative to the court system for resolving disputes.

You can contact AFCA as follows:
Australian Financial Complaints Authority
GPO Box 3
Melbourne VIC 3001

Phone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

If you are dissatisfied with our handling of your complaint or the final decision, you may also contact the Office of the Australian Information Commissioner (OAIC). OAIC is an independent statutory agency and has the power to investigate and resolve privacy complaints and may make a determination in respect of complaints.

You can contact OAIC as follows:

Office of the Australian Information Commissioner
GPO Box 5218
SYDNEY NSW 2001

Phone: 1300 363 992
Fax: (02) 9284 9666
Email: enquiries@oaic.gov.au
Website: www.oaic.gov.au

12.0 Document Review History

To ensure that this policy remains current, it will be reviewed at least annually and updated if required. The following section details the history of updates made to this document::

- Version 1: 12 March 2014
- Version 2: 23 December 2015
- Version 3: 29 June 2016
- Version 4: 13 September 2017
- Version 5: 23 January 2018
- Version 6: 1 November 2018