

'our privacy policy'

At 1 July 2016

1. Our GuildSuper Privacy Policy – what you should know

We understand that keeping your information confidential and secure is important to you – and it's very important to us too. To help you understand how we collect, use and share your information, we've developed this Privacy Policy. This GuildSuper Privacy Policy (we refer to it as the 'Policy') sets out how GuildSuper (also 'we', 'us' and 'our'), through Guild Trustee Services Pty Ltd as the trustee of GuildSuper, and Guild Superannuation Services Limited manages the collection, use, disclosure and security of personal information in line with the *Privacy Act 1988* and the Australian Privacy Principles.

2. Why have a Privacy Policy?

So we can provide products and services to you, GuildSuper needs certain personal information to be collected, used, disclosed and retained. The type of information required will vary depending on the services and products we provide. It's important that you understand what type of information we need to collect and what sort of processes we have around how we collect and manage your information.

We're required to make our Privacy Policy available to the public by law.

Throughout this Policy, personal information handled by us can be classified into two categories:

- **Personal information** is information that identifies or could identify a person. For example a name, address or other contact details.
- **Sensitive information** is information or an opinion that has been classified in the *Privacy Act* as being sensitive information. It includes but is not limited to information on your health, criminal record, insurance history, your membership of a professional or trade association and Tax File Number (TFN).

To make things easier, when we mention 'Personal Information' it will also include sensitive information unless we specify otherwise.

3. Who's responsible?

We take the privacy of your information seriously and that's why we've made a number of people in our organisation responsible for making sure it's implemented and managed appropriately.

In particular, we have nominated a Privacy Officer who is responsible for the implementation of this Policy.

4. Our privacy processes

There are six processes that cover how we manage your personal information. These include:

1. How we collect your personal information;
2. How we use and disclose your personal information;
3. How we store your personal information;
4. How we manage a request to disclose your information overseas (called Cross Border Disclosure);
5. How you can access and correct your personal information; and
6. How we handle complaints.

To help you better understand what's involved with these process we've provided some more information below:

4.1. Collecting your personal information

So we can provide our superannuation services to you, we need to obtain certain personal information from you. We only collect personal information that is necessary to offer these services and this includes your:

- Name, date of birth and contact details;
- Bank account or other financial details for payment purposes;

- Proof of identity such as driver's licence;
- Employment details including employer details, occupation, employment status, salary, industry sector, employment duties, qualifications and memberships;
- Your TFN;
- Beneficiary details and information required for benefit payments;
- Details of other superannuation funds for rollovers;
- Medical, insurance and lifestyle information for insurance underwriting; and
- Medical and other information relevant to an insurance claim.

You have the option of choosing not to provide all or some of the information requested, though this may impact our ability to provide our services.

You have the option of not identifying yourself, or of using a pseudonym, when dealing with us in relation to the following matters:

- When you browse the websites, the Guild Group does not collect your personal information; and
- You can make a general enquiry without providing your personal details by telephone.

Please refer to the website www.guildsuper.com.au for conditions of use of our website.

The option of remaining anonymous however is very limited given the nature of information needed for us to provide our services to you.

How we collect your personal information

We will only collect your personal information by lawful and fair means and, unless legally specified, only if you consent to the collection, through:

- Phone, which may include recording telecommunications with your consent;
- Online forms, portals and tools, which includes application and feedback forms that may include your Internet Protocol (IP) address;
- Email when you provide information via email, or ask to be on an email list, including the email address itself; and
- Written material, in particular application forms, when you provide information to us.

At times it may be impracticable or unreasonable to collect personal information directly from you. In these cases, and with your consent, personal information may also be collected from the following third parties:

- Third parties you refer us to;
- Information that's available publicly;
- Related companies;
- Brokers and financial advisers;
- Employers;

- Professional Associations;
- Health practitioners where relevant to insurance underwriting and/or claims;
- Claims assessors and investigators; and
- Lawyers.

In some circumstance we may access mailing lists to acquire new members or conduct market research. We use reputable mailing list companies who are also bound by the *Privacy Act*. We do not keep a record of any information about you from those lists unless you contact us. The information on those mailing lists remains the property of the company from whom the list was provided.

We will obtain specific consent from you when we collect sensitive personal information, unless a specific legal exemption as outlined below applies. The *Privacy Act* does allow the collection of personal information without consent where required by law or court order, and also in the following situations:

- We are legally required to collect certain personal information to meet the requirements of the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* though normally this is collected directly from you with your consent.
- We need to collect your TFN, with trustees authorised to do so by the *Small Superannuation Accounts Act 1995*, the *Income Tax Assessment Act 1936*, the *Superannuation Industry (Supervision) Act 1993* (SIS) and the *Privacy Act 1988*. Trustees are authorised to collect your TFN for a number of reasons including:
 - Finding and bringing together your superannuation benefits within GuildSuper where insufficient information is provided;
 - Passing your TFN to the Australian Taxation Office (ATO);
 - Allowing GuildSuper to provide your TFN to a superannuation fund receiving any benefits you may want to transfer, and
 - Finding which superannuation benefits you may hold in other funds.

We will only use your TFN for lawful purposes and your TFN will be kept confidential at all times. Please note that the lawful purposes and the consequences of not providing your TFN may change as a result of legislative changes.

4.2. Using and disclosing your personal information

Unless you have agreed, we will only use and disclose your personal information for:

- The purpose for which it was given to us; and
- Related purposes which you would reasonably expect.

We use and disclose personal information for the following purposes:

- To verify your identity;
- To evaluate, effect, manage and administer the services provided by us;
- To inform you of other products and services offered by other entities within the Guild Group of companies, any related entity or your representative. This includes marketing and promotion by way of direct mail, telemarketing, email, SMS and MMS messages. However, you may at any time 'opt out' of receiving direct marketing;
- When engaging third party providers to perform services for GuildSuper which involves third parties handling personal information;
- To research, develop and improve our services, including testing and improving systems for the management of the services provided;
- For security and audit purposes, service monitoring, internet traffic monitoring, troubleshooting, maintenance, to protect against and identify security breaches, inappropriate behaviour, fraud and unauthorised access to the IT systems of either customers or GuildSuper;
- For communication purposes where contact details are received by us because you sent these to enable us to respond to your request;
- To and from your professional association for the purposes of administering and improving our services;
- To and from your employer where relevant for the management of superannuation contributions; and
- Where required to do so by Law.

Importantly, we don't provide your details to other parties (such as mailing lists) that are unrelated to the GuildSuper business and our service to you.

4.3. Storing your personal information

Ensuring the security of your personal information is very important to us and we take all reasonable steps to store your personal information in a way that protects your information from misuse, loss, unauthorised access, modification or disclosure.

To support the protection of your personal information, we have implemented a number of policies and processes, including but not limited to confidentiality requirements to be met by employees, security measures for building and systems access and firewalls and other security measures for online systems.

Generally, hard and soft copy documentation is held in internal filing or on secure offsite IT systems.

For archiving and back-up purposes, documentation may also be held in secure and professional offsite storage facilities.

Your personal information will also be held on secure IT systems that are managed by the Fund's administrator.

To ensure that the storage of personal information remains secure, we regularly review our information storage processes.

4.4. How we manage cross-border disclosure

Generally, GuildSuper will not be required to disclose personal information to overseas recipients.

There may be some situations, though, where personal information could be provided to overseas recipients, such as our administrator's overseas affiliates or where disclosure is required in relation to benefit payment purposes.

4.5. How you can access and correct your personal information

You have the right to access your own personal information held by us and where this is incorrect, to request that we correct the information.

Accessing your personal information

To access your personal information simply contact us by phone or in writing and request the personal information we hold on the file in relation to you. The contact details are outlined below. We will provide access to the information fairly and efficiently, in an appropriate format and within a reasonable timeframe that will be agreed with you.

There may be exceptional circumstances where we cannot provide you with access to your personal information because of reasons outlined in the Australian Privacy Principles. In these cases we will advise you in writing why we cannot provide you with the information and mechanisms available to you should you want to lodge a complaint.

Correcting your personal information

If you believe we hold incorrect personal information, you can notify us on the contact details on the next page.

If the information is confirmed to be incorrect, we will correct it as quickly as possible and provide a confirmation to you that the correction has been made.

In the exceptional circumstances we have received a request to correct your personal information but are unable to implement the correction you have requested, we will advise you in writing of the grounds of refusal and mechanisms available should you wish to lodge a complaint.

4.6. How we handle complaints

If you believe we have breached our Privacy Policy or not adhered to the Australian Privacy Principles you have the right to lodge a complaint. We have a formal complaints and dispute resolution process in place that is fair, efficient and accessible to everyone.

To lodge a Privacy complaint, you can contact us by phone or in writing using the contact details outlined below, or by using the feedback options at www.guildsuper.com.au.

Our complaints and dispute resolution process is available at no cost to you and we will keep you fully informed throughout the process and provide a formal response to the complaint.

At any time or if you are not satisfied with our initial response, your Privacy complaint can be escalated to the Privacy Officer by using the contact details outlined below.

Alternatively, you may also lodge a complaint with the Office of the Australian Information Commissioner to the following details:

Online: <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

By email: enquiries@oaic.gov.au

By phone: 1300 363 992

By post: GPO Box 5218 Sydney NSW 2001

5. Reviewing this Policy

This Policy is reviewed annually which helps to ensure that changes affecting us are included on an ongoing basis. This Policy may also be reviewed more frequently if any circumstances such as legislative changes occur that impact it.

‘we’re here to help’



To access personal information, request a correction or lodge a Privacy complaint, you can contact us as follows:

By phone during office hours on 1300 361 477

Alternatively, we can also be contacted in writing by sending your request or complaint to:

**GuildSuper,
GPO Box 1088,
Melbourne VIC 3001**

