

# Privacy Policy

October 2017

This privacy policy explains how SuperConcepts will handle and protect personal information it collects about individuals including customers and potential customers.

'SuperConcepts', 'we', 'us' or 'our' refers to SuperConcepts Pty Ltd and each of its entities operating in Australia listed on page 7. These entities trade as "AMP SMSF Solutions", "Ascend", "Cavendish", "Desktop Super", "JustSuper", "Multiport", "Super Concepts", "SuperConcepts", "SuperIQ", "SuperMate" or "yourSMSF". We provide software, administration, document services and education solutions and other products and services.

We are committed to protecting your privacy. At all times we will comply with the terms of this policy when handling your personal information. This policy answers the following questions about privacy at SuperConcepts:

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## Why do we need your personal information?

We provide solutions in software, administration, document services and education in respect of SMSFs as well as other products and services under various brands offered by entities within the SuperConcepts group. To do this effectively, we need to collect certain personal information.

In this policy, personal information is any information that could identify you or be used to establish your identity.

We collect, hold, use and disclose customers' personal information so we can establish, manage, administer the products and services provided by us, and comply with legal and regulatory obligations. We may also use and disclose your information for purposes related to those mentioned above, such as:

- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Enhancing our customer service and product options (see the section 'Will my personal information be used for direct marketing?')
- Internal operations, such as record keeping, data analytics, auditing or training.

## Will my personal information be used for Direct Marketing?

We use and disclose your personal information to keep you informed about the range of products and services offered by us. You can opt-out of receiving direct marketing information from us at any time (see the section 'How can you contact us about privacy?').

### **What happens if I do not provide information that has been requested?**

It's your choice whether to provide your personal information. However, if you don't, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud.

## What types of personal information do we collect?

We may ask for a range of personal information to assist us in providing you with relevant products and services. The information we request could include (but is not limited to) name, address, date of birth, contact details, income, assets and liabilities, account balances, tax and financial statements, health information, employment details, domicile and citizenship status.

### **Will we collect sensitive information?**

Rarely we need to collect and use sensitive personal information. If we need to obtain, use and disclose this type of information, we will ask for your consent, except where disclosure is permitted by law.

### **How do we collect personal information?**

Most of the personal information we collect will be directly from you. We gather this information either through application forms or other forms that you complete and submit to us (in writing and digitally) and by recording the information you provide via phone calls interviews, email and other forms of communication with us. In some cases, we might collect your personal information from external sources.

Examples of the people or organisations that may provide us with information are:

- your SMSF Trustee when a new member or beneficiary joins or they apply for a new product for your SMSF
- parents or guardians in respect of children
- persons authorised by you to act on your behalf (such as advisers, lawyers, accountants or other individuals or organisations)
- product and service providers you authorise to give us your information for us to provide you an administration service
- third parties such as information verification service providers and the Government's Document Verification Service (DVS)
- public sources of information (websites that make your information available)
- market research organisations (through surveys or telephone polls)

We only collect your information from external sources when we are permitted to do so.

### **Can you remain anonymous or use a pseudonym when dealing with us?**

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However, in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

### **How do we protect your personal information?**

Whether your personal information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet or other methods, we take steps to store your information securely. We hold your personal information in a combination of electronic and hard copy formats.

We take a number of steps to protect personal information from misuse, loss, unauthorised access, modification or improper disclosure. These include instructing our staff who handle personal information on our obligations to protect the confidentiality of customer information and the privacy of individuals.

When we no longer need your personal information we will take reasonable steps to delete, destroy or de-identify it.

### **Who do we share personal information with?**

From time to time we may share your personal information with other entities both within and outside of SuperConcepts. The entities that we might share your personal information with vary according to the product or service involved, but could include:

- other areas or businesses within SuperConcepts for reasonable business purposes
- businesses and organisations or other parties authorised or accredited by us to provide services to you on our behalf
- service providers, specialist advisers, consultants and contractors we engage to provide us with services, such as administrative, financial, software development, marketing, sales or research services, some of whom may contact you on our behalf

- information verification services, the Government Document Verification Service (DVS) or reference agencies or investigators
- employers contributing to your SMSF
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other service or financial services providers that we may need to deal with on your behalf
- anyone to whom we, or our service providers, are required or authorised by law to disclose your personal information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, Office of the Australian Information Commissioner, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service)
- other financial services institutions - in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

Please also note that SuperConcepts is part of the AMP Limited group, and that personal information collected by one part of the AMP group, such as SuperConcepts, may be shared with other companies in the AMP group for reasonable business purposes.

### **Do we send personal information to overseas recipients?**

Some of the entities that we share information with or whose services that we use may be located in, or have operations in, other countries.

This means that your information might end up stored or accessed in overseas countries, including Bahrain, China, European Union, Hong Kong, India, Japan, Malaysia, Mauritius, New Zealand, Philippines, Singapore, Switzerland, Sri Lanka, United Kingdom and United States.

When we send your personal information to overseas recipients, we make sure appropriate data handling and security arrangements are in place.

### **How do we update personal information?**

We will update your personal information if you contact us. In most cases you can update your personal information over the phone or via our website.

We may update your personal information if we believe the personal information we hold is incomplete or out of date, we could seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

## How can you contact us about Privacy?

You can call us on 1800 625 644, send an email to [Privacyofficer@SuperConcepts.com.au](mailto:Privacyofficer@SuperConcepts.com.au) or write to us at SuperConcepts Privacy Officer, PO Box R476, Royal Exchange NSW 1225 to:

- seek more information about anything contained in this policy, or to request a printed copy
- ask about accessing or correcting the personal information we hold about you; or
- make a privacy related complaint.

If you would like to opt out of receiving direct marketing material please do so here:

<http://lp.superconcepts.com.au/Subscriber-Preferences>

## How do you find out about your personal information we hold?

You can access the personal information that we hold about you by calling, emailing or writing to us (see how you can contact us about privacy). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time.

There are some situations where we are allowed to refuse or limit your access to information, If that happens, we'll write to you and let you know why. Examples include where:

- giving access would have an unreasonable impact on the privacy of other individuals
- giving access would be unlawful, or where denying access is required or authorised by an Australian law or a court order
- both of the following apply:
  - I. we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in; and
  - II. giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- giving access is likely to interfere with law enforcement activities.

There is no charge for making a request to access your personal information. However, in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

## How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed at the start of this section.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. In most cases, we'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

## How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to SuperConcepts Privacy Officer by email to [Privacyofficer@SuperConcepts.com.au](mailto:Privacyofficer@SuperConcepts.com.au) or write to:

The SuperConcepts Privacy Officer  
PO Box R476, Royal Exchange NSW 1225

Alternatively, you can contact an external body:

- If your complaint is about how we handle your personal information you can contact the Office of the Australian Information Commissioner — call 1300 363 992 or find them online at [oaic.gov.au](http://oaic.gov.au)
- If your complaint is about the products and services we provide you can contact Financial Ombudsman Service on 1800 367 287 or find them online at [fos.org.au](http://fos.org.au)

## What about privacy and the internet?

### Interactive tools

Our websites and mobile device applications may provide you with interactive tools designed to help you. We may collect personal information you enter when using interactive tools on our website or through our applications.

### What are cookies and how do we use them?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our websites if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

### Links to third party websites

Our websites have links to external third party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to SuperConcepts' privacy standards and procedures.

## Website analytics

We may use third party analytics software to analyse traffic to our websites and apps or to anonymously survey users of our sites and apps.

Website analytics may be used to collect such information as the number of unique visitors, how long these visitors spend on the website when they do visit, and common entry and exit points into and from the website. This information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites. We may use this information to provide, maintain, improve and develop our products and services. We may also use this information to offer you tailored content.

Information we collect when you are on our websites, in addition to information we hold about you, may be associated with you. When information is associated with you we treat it as personal information.

## About this policy

This policy is effective as of 1 October 2017. We will update this policy when our information handling practices change, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy, or contact us for a printed copy.

This policy incorporates the relevant provisions of the Privacy Act and the Australian Privacy Principles. This policy applies to the following entities operating in Australia: Cavendish Administration Pty Ltd, the Cavendish Administration Unit Trust, Corporate Custodians Pty Ltd, JustSuper Pty Ltd, Multiport Resources Pty Ltd, SMSF Administration Pty Ltd, SMSF Operations Pty Ltd, SMSF Outsourcing Services Pty Ltd, Super IQ Pty Ltd, SuperConcepts Pty Ltd, SuperConcepts Administration Pty Ltd, SuperConcepts Software Services Pty Ltd, yourSMSF Administration Pty Ltd, the yourSMSF Administration Unit Trust.

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