ARACON SUPERANNUATION

Privacy Policy

20 March 2020

Privacy Policy

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1. Overview

Aracon Superannuation Pty Ltd ABN 13 133 547 396 ('Trustee') as trustee (RSE Licence number L0003384) of The Aracon Superannuation Fund ('the Fund') is committed to protecting the confidentiality and security of your personal information. We are bound by the Privacy Act 1988 and the Australian Privacy Principles ('APPs') and regulated by the Office of the Australian Information Commissioner (OAIC).

The purpose of this document is to document how the Trustee collects, uses and manages your personal information.

2. Personal Information and it's collection.

Personal Information is information or an opinion about an individual from which they may be reasonably identified. Personal Information includes 'Sensitive Information' which is any information or opinion regarding an individual's race or ethnic origin, political opinions, religious beliefs, philosophical beliefs, sexual preferences, trade/ trade union associations, criminal record or health, genetic or biometric information.

The Trustee may collect and hold Personal Information about members or beneficiaries that is necessary in order to provide our services. The Trustee will not seek any Personal Information unless it is required for these purposes.

The Personal Information we collect regarding our members and beneficiaries includes full name, address, telephone number, email address,, date of birth, Tax File Number (TFN), Inland Revenue Department number, names of nominated beneficiaries and information about health, profession and reasons for financial hardship.

Unless required by law, we will only collect Sensitive Information with a member's consent. The Personal Information we gather enables us to establish and administer an account on behalf of a member, verify an individual's identity and arrange insurance (as required).

The Trustee may obtain government related identifiers such as a tax file number (TFN) but will not use or disclose this information other than as authorised by law.

3. How we collect personal information.

We do not collect any Personal or Sensitive Information about members without consent. Most information that we collect will be via a third party such as a financial adviser, Promoter of an Aracon sub-plan or Insurer.

Any third party collecting Personal Information on our behalf will be expected to ensure that where relevant, members are made aware of the following at the time the information is requested:

- the purpose for collecting the personal information;
- details of the entity collecting the information;
- organisations to which this information may be disclosed;
- consequence of not providing the requested information;
- how you can access and update your personal information;
- that a facility is available to complain about the handling of your personal information should you believe it is not handled in accordance with the Privacy Act

4. How we hold personal information.

The Trustee ensures that processes are in place to protect the Personal Information of members and beneficiaries from unauthorised access, modification, misuse or disclosure outside the terms of the Privacy Act.

The Personal Information we hold may be in electronic or hard copy form. The Trustee maintains an Information Security Framework to ensure staff and service providers are aware of the Trustee's data security requirements. There is also a Document Retention Guidelines document to manage the retention and destruction hard copy records.

All staff and service providers are required to follow security procedures using up-to-date technology. Account information is password protected and instructions are verified before they are processed. Personal Information is stored on secured systems. Data is regularly backed up and stored.

Where information is stored by third parties the Trustee expects that information is stored in accordance with this policy. This is verified at least annually by the Head of Trustee Office and reported the Trustee.

Training is required to be provided to all third party staff both on induction and at least annually on privacy obligations and confirmation of this provided to the Trustee at least annually by the Head of Trustee Office.

Where Personal Information collected is no longer needed for any purpose that is permitted under the Privacy Act, we can delete, destroy or permanently de-identify the personal information.

We may disclose personal information to any of the following while managing the Fund:

- our staff, related bodies and service providers;
- financial advisers nominated by clients;
- promoters;
- any organisations or professional advisers involved in providing, managing or administering our products or services such as auditors, accountants, lawyers, custodians, external dispute resolution services, insurers, investment managers or mail houses, within normal business practices;
- medical practitioners and other relevant professionals, as appropriate;
- your personal representative, or any other person who may be entitled to receive a death benefit, or any person contacted to assist us to process that benefit;
- support services;
- any fund where a superannuation benefit is transferred or rolled over; and
- where otherwise required or authorised by law.

5. Dealing with the Fund by pseudonym or anonymously

Under law an individual may deal with the Fund anonymously or using a pseudonym. The information available under such circumstances will of a general nature only about the Fund. To join the Fund or obtain personal information such as the account balance, personal information and verification will be required.

6. Disclosure of Personal Information to other parties

In order to administer the Fund the Trustee may need to disclose members' personal information to third parties including:

- The Fund administrator who undertakes day-to-day operations;
- Insurer;
- Custodian;
- Auditor;
- Investment administrator;
- Medical Practitioners in relation to health cover;
- The Australian Taxation Office;
- Other government authorities as required to comply with regulatory requirements;
- Other trustee where transferring to or from another fund; and
- Financial adviser, power of attorney or appointed representative

7. Consequences if we do not collect Personal Information

You are entitled to decide not to provide your personal information to us, however in most cases this will preclude Aracon from providing you financial services as we are obliged by law to only provide services where a member has been identified.

8. Overseas Disclosure

The Trustee has engaged the services of JP Morgan Chase Bank, N.A., Sydney Branch to provide Custody Services to the Fund. Your personal information will not be disclosed overseas without the Trustee's approval.

9. Storage of Personal Information

All hard copy documents containing Personal Information are stored securely while in use. Soft copy Personal Information is held securely, backed up regularly and access is password protected. There are a number of regulatory obligations around how long information must be kept, therefore once personal information is no longer required to complete an immediate function, it is stored at a secure off sight facility. Once the Personal Information held is no longer required, the Head of Trustee Office will arrange for the information to be destroyed or de-identified.

10. Cookies

The Fund website uses "cookies" to enhance your website experience. A cookie is data that the website sends to your browser and is stored on your computer to provide a more efficient website interaction. We also use cookies to collect statistical information on website activity, such as the number of people using our website and how they navigate through it. We do not use this information to personally identify you.

11. Access to Personal Information

Under the Privacy Act our members have the right to seek access to the information that we hold about them and update or correct it. Information may be requested from the Privacy Officer at the contact details below. Personal Information will be provided where it is lawful to do so and free of charge.

In order to protect members' information, proof of identify may be requested prior to releasing information.

12. Maintaining quality of personal information

The Trustee will take reasonable steps to ensure that member information is accurate, complete and up-to-date. Should a member become aware of information held by the Fund being out of date, they are encouraged to provide advice of the correct information.

13. Aracon's Privacy Policy

This policy will be reviewed annually or where a relevant change to Privacy legislation occurs. An up-to-date version of the Aracon Privacy Policy is available on the Fund's website at www.araconsuper.com.au. Should you have any questions about the policy or wish to obtain a paper copy of this document, please contact our Privacy Officer: Phone: 1300 669 891
Email: info@aracon.com.au

Mail:

Privacy Officer:
Aracon Superannuation Pty Ltd
PO Box 482
Collins Street, West Victoria 8007

14. Complaints

If you have a complaint about the handling and protection of your personal information held by the Fund, please contact the:

Privacy Officer:
Phone: 1300 669 891
Email: info@aracon.com.au

Mail:

Complaints Officer
Aracon Superannuation Pty Ltd
PO Box 482
Collins Street, West Victoria 8007

Aracon is committed to resolving your privacy complaint as quickly as possible. You will receive a response to your complaint within 21 days. Should we fail to resolve the issue in that time we will write to you to provide an update on our progress.

If you are not satisfied with our response or have not received a response within 30 days, you may refer the matter to the Office of the Australian Information Commissioner (OAIC).

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

Phone: 1300 363 992
Email: enquiries@oaic.gov.au