

DIVERSA

GROUP

Diversa Superannuation Services Limited Privacy Policy

Introduction

It is the objective of Diversa Superannuation Services Limited ('DSS') to ensure that clients and members personal information is protected at all times. We protect the information we receive by maintaining physical, electronic and procedural safeguards in order to meet applicable standards. By providing information clients and members consent to us collecting, disclosing and using personal information. DSS handles your personal information in accordance with the provisions of the Commonwealth Privacy Act and the Australian Privacy Principles.

What does "personal information" mean?

Personal information is any information, including an opinion, about you that identifies you or by which your identity can be reasonably determined

What personal information is collected?

Personal information held by DSS may include your name, date of birth, marital status, current and previous addresses, telephone/mobile phone number, e-mail address, employment details, tax file number, financial advisors' details, investment choice as well as your health and financial information.

Why We Collect Your Personal Information?

We may collect personal information for a number of purposes, which may include:

- ◆ Providing clients or members with membership;
- ◆ Processing receipts and payments;
- ◆ Administering clients or member participation in the Superannuation Funds or Group Life Pool;
- ◆ Assessing, processing and investigating insurance risks or claims;
- ◆ Answering enquiries;
- ◆ Providing general advice about the products we administer;
- ◆ Providing account information regularly or upon request;
- ◆ Statement production and other mail related services; and
- ◆ Meeting legal and regulatory requirements.

If you choose not to provide personal information, we may not be able to provide you with the services you require, or the level of service on which we pride ourselves.

Who May Access Clients and Members Information

Diversa only permits personnel associated with its Superannuation funds, Group Life Pool and its service providers to have access to personal information.

Third parties that process personal information on our behalf are required to follow stringent standards of security and confidentiality. We will not disclose clients and members personal information for marketing purposes to other entities unless agreed.

How we collect personal information

We will only collect personal information relevant to our business relationship with you. Where possible we collect your personal information directly from you.

Collection may take place in a number of ways such as when you complete an application form for a product or request a product or service over the telephone or Internet.

Often personal information is collected during the course of our relationship with you. Examples of personal information collection during our relationship may be when you lodge a claim for TPD or change nomination of a beneficiary.

Sometimes personal information may be collected about you from other sources. Examples of where we may receive personal information about you from another source and why this would happen are:

- ◆ Your employer in the course of establishing and administering your membership of a superannuation fund
- ◆ An insurance investigation in the course of assessing your claim under a policy of insurance
- ◆ A medical practitioner in the course of assessing your claim

In most cases we will require you to specifically consent to any collection, use or disclosure of your personal information by DSS. Your consent will usually be required in writing but we may accept your verbal consent in certain circumstances.

However no matter how your personal information is collected it is dealt with by DSS in accordance with this Privacy Policy.

How we use your personal information

We use the personal information that we collect so that we can conduct our business of providing financial products and services and to administer and enhance the financial service relationship we have with you.

Direct Marketing

From time to time we may use your personal information to provide you with information about our range of financial products and services.

DSS does not disclose your personal information to a party outside DSS for the purposes of allowing them to direct market their products or services to you.

If you do not want us to contact you or use your personal information to send you direct marketing material, please phone DSS Member Services Team on 02 8267 8400.

Often the law requires us to provide you with certain information about the product or service that you receive from us. You will continue to receive this type of information from us.

Do we disclose your personal information to anyone?

DSS may disclose your personal information in certain circumstances.

Sometimes we are required or authorised by law to disclose your personal information. For example we may disclose your personal information to a Court in response to a subpoena or to the Australian Taxation Office following a direction issued under taxation laws.

We may also disclose your personal information where you have consented to us doing so. Your consent to the disclosure of your personal information may be given explicitly such as in writing or

verbally or may be implied from your conduct such as when you discuss details of the relationship you have with us publicly with the media.

Disclosures of Clients and Member Information

We may share personal information with selected third parties for the purpose of administering the Superannuation Funds and Group Life Pool, and information may be provided to them on a confidential basis for this purpose.

We will not disclose clients and members personal information (if applicable) for any purpose other than to perform administrative and other contracted functions and responsibilities for the products and services we provide. The organisations we may disclose personal information to may include, for example:

- ◆ Mail houses - For mail related services
- ◆ Administrators - For data entry, data processing, account maintenance and documentation
- ◆ Insurer - To assess client's application, underwriting and claims assessment
- ◆ Employers and trustees of Superannuation funds - To administer the member's accounts or Pool membership
- ◆ Government agencies - To comply with laws and regulations

Help us to ensure we hold accurate information

DSS takes reasonable precautions to ensure that the personal information we collect, use and disclose is accurate complete and up-to-date. However, the accuracy of that information depends to a large extent on the information you provide. That's why we recommend that you:

- ◆ Let us know if there are any errors in your personal information
- ◆ Keep us up to date with changes to personal information such as your name or address and beneficiaries

Is my personal information secure?

The protection of your personal information is a priority for DSS.

This is why we take reasonable precautions to safeguard your personal information from loss, misuse, unauthorised access, modification or disclosure.

We employ a number of means to protect your personal information including,

- ◆ External and internal premises security
- ◆ Restricted access to personal information
- ◆ Entering into confidential agreements with all employees, contractors and third party organisations
- ◆ Having in place stand-by systems to deal with major business interruptions
- ◆ Maintaining technology products to prevent unauthorised computer access
- ◆ Regular reviewing and testing of our technology in order to improve the level of security

Can I access the personal information?

You have a right to access your personal information, subject to some exceptions allowed by law. If you would like to do so please let us know. You may be required to put your request in writing for security reasons.

For more detailed requests for access to personal information, for example, access to information held in archives, a fee may be charged to cover the cost of retrieval and the supply of this information to you.

DSS may be required by law to retain your personal information for a period of time after you have ceased your relationship with us. After the required time has passed we attend to the secure destruction or deletion of your personal information.

Can my request for access to my personal information be denied?

DSS is not always required to provide you with access to your personal information upon your request.

We may refuse you access to personal information in a number of circumstances such as where the information may relate to existing or anticipated legal proceedings with you, where denying access is required or authorised by law, or where the request for access is regarded as frivolous or vexatious.

If we deny your request for access to, or refuse your request to correct your personal information we will explain why.

What is a Commonwealth identifier?

A Commonwealth identifier is a Commonwealth Government or Commonwealth Government agency designated identification number such as your Tax File Number (TFN) or Medicare number.

DSS does not use Commonwealth identifiers as a means of identifying the personal information that we may have collected about you.

We only use Commonwealth identifiers when we supply your TFN to the Australian Taxation Office.

Do I have to be identified at all?

Generally it is not possible for us to do business with you unless we have identified you.

Wherever it is lawful and practicable to do so, we may offer you the opportunity to deal with us anonymously. For example, when making an inquiry about current earning rates applicable on investments or our fees and charges in general.

Does my personal Information leave Australia?

DSS does not send personal information outside Australia unless it is authorised to do so by law.

Sensitive information

If personal information concerns particular topics it is regarded as sensitive information.

Sensitive information can be information about your,

- ◆ 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 preferences or practices
- ◆ Criminal record
- ◆ Health

DSS only collects, uses or discloses sensitive information about you as is allowed by law. For example where we have received your consent to do so, the collection is necessary for the establishment, exercise of defence of a legal claim, or to administer an insurance benefit.

Access to our services via the Internet

Whilst the Internet has brought many improvements to the way DSS is able to do business with you we also understand that you may have concerns about the personal information collected about you online or the security of your personal information that may be exchanged between us online.

When you visit the web sites of a product that DSS administers, you will browse anonymously; In some instances there may be a personal login required to view some website content.

For all visitors to our web site, we use cookies to collect anonymous information such as the server your computer is logged on to, your browser type (for example, Internet Explorer, Chrome or Firefox), and your IP address. An IP address is a number that is assigned to your computer automatically and required for using the Internet. We may also derive the general geographic area associated with an IP address.

If you are an anonymous visitor, the information we collect is not capable of personally identifying you.

If you have accessed our website from an e-mail or other personalised communication sent to you or provided us with personal information by completing a form online, we may be able to identify you. If we have identified you, we may be able to link your identity to your previous anonymous browsing history and collect information about your possible future use of our websites, irrespective of how you access our sites (eg by clicking a link in an advertisement or from a third party website). In addition we may combine that information about your use of the websites with certain other online and offline information we have about you in order to tailor your online experience and provide you with further information. If you would prefer not to be identified you can delete the cookies and reconfigure the cookie preferences on your internet browser (see below).

Cookies

A 'cookie' is a packet of information placed on a user's computer by a website for record keeping purposes. Cookies are generally used on the websites to:

- ◆ access online services - if you visit the website and log into our secure areas we will use cookies to enable us to authorise your access and save your preferences
- ◆ monitor traffic- we use tracking companies to gather anonymous information about how people are using the sites, this information includes time of visit, pages visited, and some system information about the type of computer you are using. We use this information to enhance the content and services offered on the site
- ◆ collect identifiable information about your use of our websites - if we have identified you from an e-mail or other personalised communication sent to you or providing us with personal information by completing a form online.

You can configure your browser to accept all cookies, reject all cookies, or notify you when a cookie is sent. (Each browser is different, so check the "Help" menu of your browser to learn how to change your cookie preferences).

If you disable the use of cookies on your web browser or remove or reject specific cookies from the websites or linked sites then you may not be able to gain access to all of the content and facilities on those websites.

Security of your personal information online

Generally e-mail is not a secure way to communicate therefore you should not send your personal information to us via email.

How we hold information

We maintain client and member personal information both electronically and in paper format.

Electronic

Electronic data storage occurs via the Acurity and MySuperSolution administration software and other electronic documents stored on the computer system server. To ensure that no unauthorised access of this data occurs, each administration staff member is provided with their own individual Acurity/MySuperSolution login and password details which they are restricted from sharing with others. Non-administration staff do not have access to the programs.

Furthermore, each staff member is provided with their own login and password details to the Diversa Group IT network. Access to electronic files on the network is restricted to that required by each staff member to complete their duties.

Staff are prohibited from accessing, storing or sharing sensitive electronic data that has not been specifically requested by a member of a superannuation fund or group insurance pool and/or that is not in line with the ordinary duties of their role.

Staff are prohibited from accessing the system using another person's login.

Paper

Sensitive paper files are to be stored in the filing cabinets located within the office and archiving warehouse. Filing cabinets are to be locked with a key and only accessed as and when required. Filing cabinets can be unlocked during normal working hours when staff are in the office. Access to the archiving warehouse is only available upon request by authorised personnel.

Whenever the office is unattended, all filing cabinets are to be locked.

Clients and Members are encouraged to contact us for further information, or raise any specific or general concerns on our Privacy Policy.

Can I complain about a breach of my privacy?

If you believe that DSS has not protected your personal information as set out in this privacy policy you may lodge a complaint with us. Depending on the nature of your complaint we may ask for your complaint in writing. The matter will be investigated and we will advise you of our findings or progress of the investigation into your complaint within 21 days of receipt of the complaint.

You can lodge your complaint by contacting the Enquiries and Complaints Officer:

Member Services Manager
Diversa Superannuation Services Limited
PO Box A2499
Sydney NSW 2000

Telephone: 02 8267 8400
Fax: 02 9262 7473

If you are not satisfied with the result of your complaint to DSS, or if DSS has not responded within 30 days of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner (OAIC)

You can contact the OAIC, by

- ◆ Telephone 1300 363 992
- ◆ Email enquiries@oaic.gov.au
- ◆ Writing Director of complaints
Office of the Australian Information Commissioner
G.P.O. Box 5218
SYDNEY, N.S.W. 2001

For further information regarding making a privacy complaint to the OAIC please refer to this website:

[Making a privacy complaint - OAIC](#)

Our Privacy Policy may change from time to time

DSS regularly reviews all its policies and procedures to keep up to date with changes in the law, technology and market practice.

As a result we may change this privacy policy from time to time. The Policy was last updated on 12 March 2014.