

# Privacy policy

1 February 2018



This privacy policy provides a summary of the personal information held by First State Super and First State Super Financial Services and how such information is collected, held, used and disclosed, as well as your rights regarding your personal information.

## We respect your privacy

FSS Trustee Corporation is the trustee ('the trustee') of the First State Superannuation Scheme (First State Super). First State Super Financial Services Pty Limited (First State Super Financial Services) provides financial planning services to First State Super members and other clients. Mercer Administration Services (Australia) Pty Limited (Mercer Administration) provides administration services to the fund on behalf of the trustee.

References to, 'we', 'us' or 'our' throughout this document refer to First State Super, First State Super Financial Services and Mercer Administration.

Protecting your personal information has always been important to us. We take our obligations under the Privacy Act 1988 (Cth) and applicable state/territory privacy acts very seriously. These Acts require us to handle your personal and health information in accordance with the *Australian Privacy Principles (APPs)* and any relevant state/territory health privacy principles.

Where you have provided us with a signed third party authority or power of attorney, we will disclose information to only those named individuals you have authorised.

## What is personal information?

Under the Privacy Act 1988, personal information is defined as information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not and whether the information or opinion is recorded in a material form or not.

Some personal information is further classified as 'sensitive information'. Under the Acts mentioned above, sensitive information is personal information or an opinion about an individual's health, ethnic or racial origin, political opinions, membership of political associations, religious beliefs or affiliations, philosophical beliefs, trade union membership, professional or trade association membership, sexual preferences or practices, criminal record or biometric information that is to be used for certain purposes.

## How we collect the information

We collect your personal information when you join the fund. Most of your personal information is collected directly from you or your employer, or other super funds when you roll your money in, or through your contact with our customer service team. First State Super also collects personal information such as your name and email address when you use the First State Super website to subscribe to newsletters, register for seminars and use online forms. Your personal information may also be provided to us by lawyers, courts or Government agencies.

We use social networking services such as Twitter and Facebook to communicate with the public. We may collect your personal information to help us communicate with you and the public.

First State Super Financial Services generally collects personal information directly from you during face to face interviews or over the telephone or via online means. When information is collected from third parties, such as a tax agent, accountant or another super fund, it is only collected with a third party authority provided by you.

In some cases, it might be necessary for First State Super, Mercer Administration, or our insurers, to collect health information about you from third parties such as your doctors or entities such as hospitals or other relevant persons.

If you choose not to provide the information, we may not be able to provide important services to you, for example determining your eligibility for a superannuation benefit.

If you join the Student Club, a club for tertiary level students (which does not make you a member of First State Super) your information is collected by First State Super via the application form you complete for membership.

## What personal information do we collect and hold about you?

We collect certain generic information when you join the fund such as your name, contact details, date of birth and tax file number. In order to administer your First State Super account, it may be necessary for us to record

your contribution history, benefit estimates, salary information, investment option, beneficiary nomination and other details that may assist in managing your account as efficiently as possible.

Also, sensitive information (such as health information) may be obtained during the assessment of an application for insurance cover or to extend or vary cover that is in place, or for the assessment of an insurance claim.

First State Super Financial Services also collects other information in order to provide you with financial planning services such as your financial (e.g. income and expenses), Centrelink, insurance and/or taxation, estate planning details, and/or information relating to your superannuation and bank accounts and/or other investments you may hold.

When you join the Student Club we record your personal details and information relating to your course and studies to offer you educational material to support your learning outcomes and offer promotions and discounts.

## How we use your personal information

We use your personal information to:

- open, administer and maintain your membership/client account and records;
- collect superannuation contributions;
- determine your eligibility for a superannuation benefit;
- determine your entitlement to an insurance benefit;
- trace different superannuation accounts in your name and if necessary use your TFN to match your accounts in the fund and consolidate them in line with our policy on consolidation;
- process your superannuation benefit payments;
- provide you with financial planning advice and related services, including the preparation of advice documents and implementation documents (i.e. in order to implement financial planning recommendations for you);
- provide you with promotional information and services about us;

➔ undertake market research, member satisfaction surveys and member data analysis; and

➔ comply with all applicable laws.

If you have Student Club membership, we hold your information to:

➔ maintain your Student Club membership;

➔ provide you with information to support your learning outcomes; and

➔ provide you with access to promotions and discounts.

If you apply for a job with us, we will collect your information for recruitment purposes, to manage your application and for your ongoing employment.

### How we disclose your information

In certain instances, we may disclose your personal information to certain third parties so that they may use and disclose your personal information for any of the purposes referred to above.

When we disclose your information to a third party who is providing services to us, we require the third party to protect your information in accordance with privacy laws and treat it confidentially. Such third parties may include:

- ➔ the fund administrator;
- ➔ insurers;
- ➔ legal advisers;
- ➔ auditors;
- ➔ mailing houses;
- ➔ death benefit beneficiaries;
- ➔ service providers, including StatePlus (ABN 86 003 742 756);
- ➔ affiliated organisations;
- ➔ employers and former employers (non-sensitive information only);
- ➔ government agencies (e.g. the ATO, Centrelink, Department of Veteran Affairs, ASIC, APRA, AUSTRAC); and
- ➔ medical practitioners (e.g. in the case of an insurance claim).

First State Super is also required, if requested, to provide certain information about your interest in the fund to:

a) your spouse; or

b) a person who intends to enter into an arrangement (e.g. a pre-nuptial agreement) with you about splitting your superannuation interests in the event of a marriage breakdown. First State Super is obliged to comply with such requests and release certain information prescribed under the Family Law Act and Regulations without informing you.

When you request a transfer of your super benefits to a New Zealand KiwiSaver scheme, we would transfer your personal information with your express consent.

### Relevance and accuracy of information

We only collect information that is relevant to your First State Super membership, the provision of financial planning services to you, or for Student Club membership. Before we use the information, we endeavour to ensure it is accurate and up to date.

You could update your information by advising us of changes to your personal details such as your address, telephone number and email address. You should also notify us if there are any incorrect details or omissions in your personal information.

### Retention and security

We hold personal information in hard copy and electronic formats. We take security measures to protect the personal information we hold including physical (for example, security passes to enter our offices and storage of files in lockable cabinets) and technology (for example, restriction of access, firewalls, the use of encryption, user logons, passwords and digital certificates) security measures. In some cases, First State Super engages third parties to host electronic data (including data in relation to the services we provide) on our behalf. These data warehouses are located in the United Kingdom and must have in place appropriate security and privacy protocols.

### Online security

Members and employers have access to their accounts online and these details are held in a secure environment. If you visit an unsecured area of our public website,

that does not require your log in details, we will not collect or retain your personal information. If you complete any forms on the public website, we will retain your contact information securely.

Members can play an important role in the security of their information by keeping their user logons and passwords to their online accounts confidential. We encourage you to be vigilant about the protection of your own personal information when using third party digital services (such as social media platforms).

As far as reasonably practicable, we will make sure that our relationships with those third parties include appropriate protection of your privacy.

### Data breaches

We must report certain data breaches to the Office of the Australian Information Commissioner (OAIC) and where required, the impacted members.

### Your rights to access and correct your information

You have rights under the Australian Privacy Principles to request access to and correction of information we hold about you. We encourage you to advise us of any personal detail changes as they occur.

You should contact First State Super Customer Service on 1300 650 873, or write to the First State Super Privacy Officer at:

First State Super Privacy Officer  
PO Box R1827  
Royal Exchange NSW 1225

### Enquiries and complaints

If you have any questions about privacy at First State Super or First State Super Financial Services, or would like to enquire or make a complaint about a breach of your privacy, please contact the First State Super Privacy Officer at the above address.

We will respond to you within 30 days of receipt of your enquiry or complaint. If you are not satisfied with the resolution of your complaint by First State Super or First State Super Financial Services, you can contact the OAIC by telephone on 1300 363 992 or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).



## Contact details

**Phone** 1300 650 873

**Fax** 1300 722 072

**Email** [enquiries@firststatesuper.com.au](mailto:enquiries@firststatesuper.com.au)

**Web** [firststatesuper.com.au](http://firststatesuper.com.au)

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Wollongong NSW 2500

This document has been prepared and issued by FSS Trustee Corporation (the trustee) ABN 11 118 202 672 AFSL 293340, the trustee of the First State Superannuation Scheme ABN 53 226 460 365 (First State Super). This document is effective 1 February 2018.