



Telstra Super Financial Planning Pty Ltd

Privacy Policy and Privacy Collection Statement

Telstra Super Financial Planning Pty Ltd must comply with the *Privacy Act 1988* (Cth) in relation to the privacy of your personal information, and the *Health Records Act 2001* (Vic) (and other equivalent State and Territory legislation), in relation to your health information. In this document Telstra Super Financial Planning Pty Ltd is referred to as “we”, “our” and “us”.

We are committed to complying with our privacy law obligations to protect and maintain the privacy of your personal information.

This document sets out our Privacy Policy and Privacy Collection Statement. It tells you about how and why we collect your personal information, how we may use and disclose it, how we keep it secure, how you can access or correct your personal information and how to make a complaint relating to your privacy.

What is personal information?

Any information or an opinion that identifies you or enables you to be reasonably identified is considered personal information. Personal information also includes sensitive information. Sensitive information includes information about your health or a disability.

Collecting your personal information

We collect the following types of personal information about you:

- name;
- residential address;
- postal address (if applicable);
- email address;
- telephone numbers;
- date of birth;
- gender;
- occupation;
- employment details including name of employer, salary, superannuation contributions, and employment status;
- TelstraSuper account balance and contribution history;
- other superannuation arrangements;
- bank details;
- social security information;
- details about your citizenship, residency or visa status;
- details of your dependants and family relationships, your insurance cover, and health status;

- your other superannuation arrangements;
- your income, expenditure and saving patterns;
- your investments, assets and liabilities;
- your objectives, financial situation and needs; and
- any other personal information required by law.

This personal information is collected directly from you when a Member Planning Profile is completed and when you meet or talk with us or may occasionally be provided to us by your spouse (if applicable).

Where you provide us with personal information about a third party (e.g. your spouse), we presume that the third party has consented to the provision of their personal information.

We only collect your sensitive health information with your consent or where we are required or authorised to do so by law. If your spouse provides us with sensitive health information about you, we presume that you have provided your consent to do so.

If you are a TelstraSuper member, we also obtain information about your TelstraSuper account balance, contribution history, salary and superannuation related details from Telstra Super Pty Ltd, the trustee of TelstraSuper (Trustee). If you do not want us to obtain this information from the Trustee or you are not a TelstraSuper member, this information will be collected directly from you.

Your personal information is also collected from your proof of identity documents, such as your driver's licence or passport, that you must provide to us so we can verify your identity as required under our internal security verification procedures and anti-money laundering legislation (e.g. when you commence a retirement income stream).

We may also collect personal information about you:

- from your authorised representative;
- from other superannuation funds or financial product issuers (if you authorise us to do so);
- when you advise us of a change to your personal information; and
- when you visit us at our offices, by capturing your image on our security cameras.

Why we collect your personal information and how we use it

We collect your personal information to:

- provide you with financial planning and related services including for use in the preparation of illustrating your retirement benefit and related options in our superannuation and advice calculators;
- administer and manage the financial planning and related services;
- comply with the *Corporations Act 2001* (Cth) and other applicable laws;
- verify your identity under our internal verification procedures and anti-money laundering legislation;
- inform you about changes that may impact on your superannuation, retirement or financial planning arrangements;
- comply with court orders;
- consider and deal with any complaints you may make;
- undertake research and conduct surveys to improve our financial planning and related services; and
- provide for your safety and security when you visit us at our offices.

From time to time, we may also use your personal information to communicate with you:

- about our financial planning services;
- about changes that may impact your superannuation, retirement or financial planning arrangements;
- to gain an understanding of your information and communication needs so we can provide you with improved services; and
- to ask you to take part in research or surveys about our services.

We may also use your personal information to undertake activities for a purpose related to a purpose listed above.

Your personal information will not be used for any other purpose without your consent.

Where possible, most communications will be sent to you electronically including via email, SMS, your online account (SuperOnline) or our TelstraSuper Financial Planning client portal. If you do not wish to receive these communications from us, please notify us on **1300 033 166** or use the opt-out facility in the communication. You are unable to opt out of receiving communications that we are required by law to provide to you.

If you do not wish to receive direct marketing communications from us electronically, you can opt out by changing your communication preference by visiting telstrasuper.com.au/subscribe or in SuperOnline or by calling us on **1300 033 166**.

Clients who sign up to an ongoing advice service arrangement will receive additional communications from time to time in relation to economic updates, market updates, legislative changes or other topics we believe may be of interest to you. If you are an ongoing service client and wish to opt out of receiving these optional communications, please contact your Financial Adviser or Financial Planning Assistant to let them know. We will never contact you to ask for your login details, nor send an SMS or email asking you to update your personal information without letting you know to expect that from us first. If you're unsure of the authenticity of a message from us, call us directly.

If you do not provide some or all of your personal information to us, we may be unable to provide you with the services you require, including providing you with financial advice that is appropriate for your personal circumstances.

You cannot deal with us anonymously or by using a pseudonym (a name, term or other descriptor that is different from your own name).

Disclosing your personal information

We disclose your personal information for the purposes for which we have collected your information, as set out above.

For these purposes, we disclose your personal information to relevant external organisations and third parties, including:

- your spouse when you seek financial advice jointly;
- your authorised representative;
- the Trustee;
- financial product issuers if you acquire a financial product; and
- third party service providers with whom we have commercial relationships for business and related purposes.

We may also disclose your personal information to:

- our professional advisers including legal and taxation advisers, auditors and accountants, and professional indemnity insurers;
- financial product issuers;
- registered life insurance companies for insurance pre-assessment purposes, if you apply for insurance cover;
- estate planning specialist advisers, if you request a referral;
- the Australian Financial Complaints Authority (AFCA);
- the Office of the Australian Information Commissioner (OAIC);
- the Australian Securities and Investments Commission (ASIC);
- the Australian Transaction Reports & Analysis Centre (AUSTRAC);
- law enforcement bodies, including contact tracing teams, government and regulatory authorities as required or authorised by law;
- research and survey consultants; and
- data validation service providers.

We take all reasonable steps to ensure third parties are bound by confidentiality and privacy obligations in relation to the protection and security of your personal information.

Your personal information will not be disclosed to any other persons without your consent unless required or authorised by law.

Direct marketing

From time to time, we may use your personal information to send you direct marketing communications including information about services, products or other opportunities that we consider may be of interest to you. Where possible, most direct marketing communications will be sent to you electronically including via email, SMS, your online account (SuperOnline) or our TelstraSuper Financial Planning client portal. If you do not wish to receive these types of communications from us, please update your marketing subscription preference via your SuperOnline account, your TelstraSuper Financial Planning client portal, call us on **1300 033 166** or use the opt-out facility in the communication.

We do not provide your personal information to third party organisations for direct marketing purposes.

We will never contact you to ask for your login details, nor send an SMS or email asking you to update your personal information without letting you know to expect that from us first. If you're unsure of the authenticity of a message from us, call us directly.

Overseas disclosure of your personal information

In order to provide our services to you, your personal information may be transferred or disclosed overseas. This is because some service providers we use are located overseas.

Where information is transferred or disclosed overseas, we will ensure that our contractual arrangements contain provisions requiring that the recipient has appropriate data handling and security systems (including encryptions) in place to prevent misuse, loss or unauthorised disclosure in accordance with Australian privacy law.

Protecting the security of your personal information

Your personal information is stored by us in hard copy and/or electronic format.

We implement technical solutions, security controls and internal processes and take all reasonable steps to ensure that your personal information in both hard copy and/or

electronic format is stored in a secure environment and protected from misuse, interference, loss, unauthorised access, modification and disclosure.

Our information technology systems utilise up-to-date security software and virus protection. Your personal information is protected from unauthorised access by the use of secure passwords and security procedures.

Our employees are required to respect the privacy of your personal information.

We aim to keep personal information as current as possible and to delete or anonymise any irrelevant or excessive data as soon as reasonably possible. However, we may need to keep some personal information for longer periods of time in order to comply with legal or regulatory obligations, or for legitimate business purposes. Images on security cameras will be retained for up to 90 days only.

Accessing your personal information

You can request access to the personal information we hold about you. Where we hold information that you are entitled to access, we will respond to your request and provide you with the means of accessing the information within 30 days. A fee may be charged for processing your access request. To request access to your personal information please contact the Privacy Officer.

There may be some circumstances where we are unable to grant you access to the personal information we hold about you. For example, access may be refused if granting access would interfere with the privacy of others, giving access would be unlawful or the request is frivolous or vexatious. If this is the case, we will provide you with written reasons for the refusal.

Correcting your personal information

We rely on your personal information being complete, up-to-date and accurate in order to provide services to you. We encourage you to keep your personal information up to date by promptly notifying us of any changes by calling us on **1300 033 166**.

If you believe any personal information we hold about you is incorrect, incomplete or inaccurate you may request that we amend the information. To request a correction to your personal information please contact the Privacy Officer. We will take reasonable steps to ensure that your personal information is corrected. However, if we do not agree that your personal information requires amendment, we will add a statement to your personal information stating that you disagree with it.

From time to time, we may undertake data validation of our client records, including addresses and telephone numbers, to improve the accuracy and integrity of the personal information we hold about our clients.

Making a complaint

If you wish to make a complaint about the handling of your personal information, please contact the Complaints Officer.

Complaints Officer
Telstra Super Financial Planning Pty Ltd
PO Box 14309
Melbourne VIC 8001

Email: privacy@telstrasuper.com.au

Telephone: **1300 033 166** between **8.30 am** and **5.30 pm** (Melbourne time) Monday to Friday.

Please provide the Complaints Officer with the details of your complaint so it can be investigated and dealt with. If your complaint is not resolved to your satisfaction within 30 days, you may refer the matter to the Office of the Australian Information Commissioner (OAIC). Further information about making a complaint to the OAIC is available from <http://www.oaic.gov.au/privacy/privacycomplaints>.

Contacting us

If you have any questions about this Privacy Policy and Privacy Collection Statement, would like further information about our privacy practices or want to access or correct your personal information, please contact the Privacy Officer.

Privacy Officer
Telstra Super Financial Planning Pty Ltd
PO Box 14309
Melbourne VIC 8001

Email: privacy@telstrasuper.com.au

Changes to our Privacy Policy and Privacy Collection Statement

We reserve the right to amend our Privacy Policy and Privacy Collection Statement from time to time. This Privacy Policy and Privacy Collection Statement is current as at 1 August 2023.