

# WA SUPER PRIVACY POLICY

This is the Privacy Policy of WA Local Government Superannuation Plan Pty Ltd (the Trustee) and WA Local Financial Services Pty Ltd (Western Financial).

WA Local Government Superannuation Plan Pty Ltd is the Trustee for WA Local Government Superannuation Plan (WA Super) and Western Financial is the Administrator of WA Super.

We understand the importance of protecting your privacy. Your personal information will be collected, used, disclosed, maintained and kept secure in accordance with the Privacy Act 1988, which contains the Australian Privacy Principles.

“Personal information” is information or an opinion about an identified individual, or an individual who is reasonably identifiable.

This Privacy Policy explains how we will collect, use, store, manage and disclose your personal information, when providing services to you as a member or other beneficiary of WA Super.

## COLLECTING YOUR PERSONAL INFORMATION

The personal information that we typically collect about you includes your name, date of birth, contact details (address, telephone and email), gender, Tax File Number (TFN), occupation, salary, employer details, employment status, and information to confirm your identity in specific circumstances. We collect and use personal information about you so that we can accept you as a member of WA Super and provide you with services and benefits in connection with your membership with WA Super.

At all times we try to only collect the information that we need for the particular function or activity that we are carrying out.

We will only collect sensitive information (including health information) about you with your consent, except where we are required or permitted by law to collect your sensitive information without your consent. We may collect or use health information about you in connection with the provision of benefits, including insured benefits.

You have the right to refuse to provide us with personal information. However, if you decide to do so, we may be unable to admit you as a member of WA Super and provide you with services and benefits in connection with your membership with WA Super.

## HOW INFORMATION IS COLLECTED

We generally collect personal information directly from you, although if you are an employer-sponsored member, we also collect information from your employer.

We may also collect personal information about you from third parties. Some examples are:

- Other super funds - when you have requested monies to be transferred into WA Super.
- Insurers – if you have requested to increase your insurance cover or you make a claim in regards to your insured benefits within WA Super.
- Doctors and other medical practitioners – if you have made a claim in regards to your insured benefits in the case of insurance claims or you have requested to increase your insured benefits.

## COLLECTING INFORMATION THAT IS REQUIRED BY LAW

We may collect information from you because we are required or authorised by an Australian law or court or tribunal order to collect that information.

Under the Superannuation Industry (Supervision) Act 1993, we are authorised to collect, use and disclose your TFN. We may disclose your TFN to another superannuation provider, when your benefits are being transferred, unless you request us in writing that your TFN not be disclosed to any other superannuation provider.

Declining to quote your TFN to us is not an offence. However, giving us your TFN will have the following advantages:

- we will be able to accept all permitted types of contributions to your account;
- other than the tax that may ordinarily apply, you will not pay more tax than you need to - this affects both contributions to your superannuation and benefit payments when you start drawing down your superannuation benefits; and
- it will make it much easier to find different superannuation accounts in your name so that you receive all your superannuation benefits when you retire.

## COLLECTION OF SENSITIVE INFORMATION

In short, “sensitive information” is information or an opinion about an individual’s health, racial or ethnic origin, religious beliefs, membership of a professional or trade association or a trade union.

Generally, we will only collect sensitive information if you request to apply for additional insurance cover or make a claim against your insured benefits within WA Super. This information is passed on to WA Super’s insurer to make an assessment of your request for insurance or to process your claim.

## UNSOLICITED INFORMATION

If we receive personal information about you that was not requested, and it is determined that the information could not have been lawfully collected even if requested under privacy law, then we will destroy or de-identify the information if it is lawful and reasonable to do so.

## USE OF PERSONAL INFORMATION

We will generally not use or disclose your personal information for a purpose other than:

- Set out in this Policy.
- You would reasonably expect.
- Required or allowed by law.
- What has been disclosed to you and which you have consented to.

We use and disclose your personal information to:

- Consider your eligibility for a product, including the insurance offerings within the products.
- Enable us to provide a product or service, including keeping you informed of your account information.
- Manage your accounts and perform other administrative and operational tasks, including, risk management, compliance and legal, internal and external audit, systems development and testing, insurance tenders and staff training.



- Identify you.
- Process benefit payments, including insurance claims, lump sum withdrawals, rollovers and income payments.
- Assist you in consolidating your super accounts and check if you have lost super (when you request us to).
- Consider your request in regards to the distribution of your death benefit (when you have provided us with beneficiary details).
- Consider any concerns or complaints you may have or raise with an external dispute resolution body and/or to manage any legal action between you and us.
- Prevent or investigate any actual or suspected fraud, unlawful activity or misconduct.
- Report information to relevant regulators as required by law, including the Australian Taxation Office (ATO), Australian Transaction Reports and Analysis Centre (AUSTRAC), Australian Prudential Regulatory Authority (APRA) and Australian Securities and Investment Commission (ASIC).
- Report information in regards to your account balance and payments to the Department of Human Services (Centrelink) if you are a WA Super Retirement Solutions member, to enable them to review your eligibility for the Australian Government Pension.
- Comply as required by relevant Australian laws, or court/tribunal orders and external payment systems.
- Provide personal financial advice.

## WHO WE MAY SHARE YOUR PERSONAL INFORMATION WITH

In undertaking the activities outlined above, we may disclose your personal information to other organisations on your behalf, for example, to:

- WA Super's Insurer.
- The Australian Financial Services Licence Holder (AFSL) in which personal financial advice is being provided under,
- Mailing houses.
- Independent consultants and market research companies.
- IT Service providers.

When forwarding information to these organisations, we will only supply information necessary for the activity to be undertaken. We take all reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

## DISCLOSING YOUR PERSONAL INFORMATION OVERSEAS

We may need to disclose your information to organisations overseas if you have:

- Transferred an amount into WA Super as a qualifying recognised overseas pension scheme (QROPS) from the UK. We may be required to report information to HM Revenue and Customs, in the United Kingdom.
- Requested to transfer your monies to a KiwiSaver account. Relevant personal details required to enable your request will be supplied to the KiwiSaver account in New Zealand.

## MARKETING

We will not trade, rent or sell your personal information to third parties, but we may use your information to tell you about other products or services we provide. You may opt out at any time if you do not wish to be sent marketing information or participate in market research. You can make this request by contacting us via email [info@wasuper.com.au](mailto:info@wasuper.com.au), or by calling Member Services on 08 9480 3500.

## OUR WEBSITE AND THE INTERNET

The information that we collect about you depends on how you use the website.

If you visit an unsecured area of the website (an area in which you are not required to log in) to read or download information, the only information we collect will be the date and time the site was visited, the pages viewed, the operating system in use, your screen resolution, your service provider and browser used and any information that was downloaded. We do not record information that allows us to identify you.

If you use live chat (Chat with us), your name and email address is recorded so that you do not need to put in your details each time you come to the site.

## THE USE OF COOKIES

A cookie is a small text file that is placed by our website onto your computer when accessing the WA Super website. Cookies are used for a number of purposes, but specifically for security and personalising services provided.

The secure page (where you log in) uses cookies to provide secure and personalised services. The live chat uses cookies to record your details so that you do not need to put in your details each time you log in.

If you do not want to receive cookies you may configure your browser to reject all cookies or warn you when cookies are being used.

## LINKS TO OTHER WEBSITES

WA Super's website provides links to other useful websites. Once you leave the WA Super website, this privacy policy no longer applies. You will need to read the privacy policy or the terms and conditions of the third party.

## EMAIL

Where emails are received, the content of the email and our response to you will be retained where it is considered necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any external mailing lists or used for any other purpose without your consent.

## SAFEGUARDING YOUR PERSONAL INFORMATION

Protecting your personal information from misuse, interference and loss is important to us. The Trustee has outsourced the storage of your information to Western Financial. Your information may be stored in hardcopy documents or electronically.

We maintain physical security, such as locks and security systems over all our hardcopy and electronic storage systems. We also have in place computer and network security procedures, such as firewalls, identification codes and passwords to control access to computer systems. We regularly review the security controls in



place to appropriately protect your personal information.

Where we no longer require your personal information, including when we no longer require it by law to keep records relating to you, reasonable steps will be taken to destroy or de-identify the personal information we hold about you.

#### HOW YOU CAN ASSIST IN PROTECTING YOUR PRIVACY

You should keep your online access login and password secure and confidential at all times. This means that you should not disclose these codes to another person.

If you believe that your login or password details have been disclosed to another person or you would like to change your password, please contact us immediately.

#### HOW DO I ACCESS MY INFORMATION

You can request access to the personal information we hold about you by using the contact details provided below. Such requests will be dealt with in a reasonable period of time, once we have been able to verify your identity. You may also be able to access your account details from your online access.

The person you speak to may be able to provide you with the information that you request over the phone or you may have the information posted to you, normally within 10 to 30 days.

In certain circumstances we may need time to consider and respond to your request and depending on the complexity we may charge you a fee for the cost of providing the information to you. We will let you know should this occur.

If we refuse access, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the Privacy Act 1988 that we rely on to refuse access.

#### HOW DO I REQUEST CORRECTION OF MY INFORMATION

If you believe that the personal information that we hold about you is incorrect you should contact us to update the information, or alternatively, you may be able to update your information via your secure log-in via our website.

#### RESOLVING YOUR CONCERNS

You are entitled to complain if you believe your privacy has been compromised or that we have breached the Privacy Act 1988.

If you have a privacy concern or complaint, you can contact the Member Services department. If your complaint is not satisfactorily resolved or responded to you may then contact WA Super's Complaints Officer. We will attempt to resolve the complaint as soon as possible, and you will be kept informed of the progress of your complaint.

The contact details for enquires and complaints are:

Phone: 08 9480 3500 or country callers 1300 99 85 42

Mail: PO Box Z5493 St Georges Terrace, Perth WA, 6831

Fax: 08 9480 3501

Email: [info@wasuper.com.au](mailto:info@wasuper.com.au)

If your complaint is not satisfactorily resolved you can contact the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. When responding to your complaint we will provide you with details on how you may make a complaint to the OAIC.

#### MORE INFORMATION

If you wish for more information on privacy and privacy laws you can contact the OAIC by visiting [www.oaic.gov.au](http://www.oaic.gov.au) or by calling 1300 363 992.

#### CHANGES TO THE PRIVACY POLICY

We may make changes to the Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website at [www.wasuper.com.au/privacy](http://www.wasuper.com.au/privacy).