

Our privacy commitment to you

CSF Pty Limited (ABN 30 006 169 286, AFSL 246664) (**the Trustee**), the trustee of the MyLifeMyMoney Superannuation Fund (ABN 50 237 896 957) (**the Fund**) is committed to respecting your right to privacy and protecting your personal information.

We are bound by the provisions of the *Privacy Act 1988* (Cth), which contains thirteen Australian Privacy Principles, which regulate how the Fund collects, uses, discloses and keeps secure your personal information.

When you entrust us with your personal information, we know you expect us to protect it and keep it private.

This Privacy Policy outlines the types of personal information the Fund may need and the reasons for its collection, and explains how the information is collected, stored, used and disclosed. It will help you to understand how the Fund takes all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

About us

The Fund is offering superannuation for the employed and self-employed, including insurance and pensions. We outsource the performance of some fund administration services to Mercer Outsourcing (Australia) Pty Ltd (ABN 83 068 908 912, AFSL 411980) (**Mercer**). We provide our members with a range of financial advisory services through our own financial planning services company, CSF Financial Services Pty Limited (trading as **MyLife MyAdvice**). We provide our members with access to an online investment and trading platform called MyLife MyPortfolio which is managed and operated by LDIS Pty Ltd (**LDIS**). We engage CK Communications Group Pty Ltd (trading as **Chandler**) to find superannuation consolidation opportunities for our members as well as prompt consent and initiate rollover request. We appoint Peakbound Three Pty Ltd (trading as **Peakbound**) to provide our members with factual information and general advice about superannuation products provided by the Fund.

Although the Fund is referred to throughout this document, it may also be Mercer and/or MyLife MyAdvice and/or LDIS and/or Chandler and/or Peakbound who collects, stores, uses and/or discloses your personal information on the Fund's behalf.

In this Privacy Policy, the Trustee, the Fund, Mercer, MyLife MyAdvice, LDIS, Chandler and Peakbound are together referred to as 'the Fund', 'we', 'our' or 'us'.

What is personal information?

Personal information is 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.

Sensitive information is a sub-set of personal information which includes any information or an opinion about your racial or ethnic origin; your political opinions; your membership of a political association, a professional or trade association or a trade union; your sexual preferences or practices; your religious beliefs or affiliations; your criminal record; and your health or disability status (including genetic and biometric information).

What types of personal information is collected and why?

Personal information

The personal information that the Fund collects from you may include your name and address, date of birth, gender, contact details including your email address, details about your occupation and employer, and Tax File Number (TFN). We may also ask you to provide original or certified documentation to verify or support your personal information (such as your driver's licence, passport, or birth certificate).

The Fund is required to obtain your consent to collect your personal information. We seek your consent, and collect your personal information directly from you where practicable, such as when you complete a membership application or change of personal details form, or when you send us documents containing personal information. There may also be circumstances where your employer is required to provide your details to the Fund on your behalf, such as to inform us of your TFN, employment status, or contributions paid on your behalf.

The personal information that we collect from or about you is reasonably necessary in order for the Fund to perform the following primary functions and activities:

- a. To establish and administer your superannuation and/or pension account(s), including processing contributions from you or on your behalf; investing in accordance with your chosen investment strategy; providing an approved insured benefit; regularly communicating with you about your account(s); and paying benefits and options to you or your beneficiaries at the appropriate time.
- b. To comply with the customer identification and verification procedures required by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) and corresponding Rules and Regulations.
- c. If you have provided your TFN, to locate or identify your superannuation and/or pension account(s); report to other regulated superannuation entities (when transferring your benefits to that entity); and report to the Australian Taxation Office (ATO) in relation to contributions and unclaimed monies.
- d. To provide you with professional advice on a range of issues that takes into account your personal circumstances and individual needs.
- e. To send you relevant information on the products and services to which your membership gives you access such as financial advice.

- f. To consider your provision of goods and services to us or application for employment at the Trustee through the staff recruitment and selection process.

The personal information that the Fund collects from or about you may also be used for secondary purposes such as assisting us to develop products and services suitable to our membership.

If the Trustee receives personal information we did not request (“unsolicited information”) we will determine whether that unsolicited information is reasonably necessary for our functions or activities. If it is, we will manage the information in accordance with our privacy policy. However, if it is information that we are not authorised to collect then, provided it is lawful and reasonable to do so, we are required to destroy or de-identify that information.

Sensitive information

There are specific circumstances where the Fund may ask for, or collect on your behalf, sensitive information in order to perform a primary function or activity, including:

- a. In order to provide you with insurance cover, or assess your eligibility to claim a benefit, the Fund may need to collect information about your health (including medical reports, work experience and qualifications) and income. We may also need to disclose your health information to a third party for verification purposes such as the assessment of a medical condition.
- b. Your bank account details in order to action a direct debit to your superannuation account and/or make a payment into your nominated account.
- c. Information about your dependants, including details of their relationship with you, in order to determine an appropriate distribution of your benefit in the event of your death.

Sensitive information will only be used and disclosed for the purpose for which it was provided, unless you agree otherwise or disclosure is required or authorised by or under an Australian law or court/tribunal order. We will always seek your express written consent before collecting sensitive information from you or on your behalf.

Information required by law

The Fund is required by law to ask you to provide certain personal information. Wherever there is a legal requirement for us to seek information about you, we will inform you of the obligation and the consequences of not providing us with the requested information.

Tax file numbers

We are required to ask for your TFN when you join the Fund. If you do not provide your TFN, we will be unable to accept personal contributions from you; you may be subject to additional tax on your contributions, and you will not qualify for the Government co-contribution if you are otherwise eligible.

If you do provide your TFN, the Fund may use it to identify any multiple accounts you may have within the superannuation industry and consolidate these into a single account of your choice. Your TFN may also be used to assist in locating “lost” superannuation monies collected by the ATO.

The Fund’s use of your TFN is strictly controlled. Unauthorised use or disclosure of your TFN is an offence under the *Taxation Administration Act 1953* (Cth) and can attract penalties including imprisonment and monetary fines.

What happens if you don’t provide the information requested?

If you choose not to provide the personal information that we ask for, or the information that you provide to us is incomplete or inaccurate, it may mean that we will be prevented from efficiently managing your superannuation and/or pension account(s), offering you the full range of benefits and services that may be available to you, and maintaining contact with you.

Anonymity and pseudonymity

The Fund understands that anonymity and pseudonymity are important elements of privacy and that you may wish to have the option of not identifying yourself, or of using a pseudonym, when dealing with us. We will allow you to remain anonymous or to use a pseudonym when dealing with us unless we are required or authorised by or under an Australian law, court or tribunal order to ask you to identify yourself or it is impracticable for us to deal with you unless you identify yourself.

How may your personal information be disclosed and why?

Generally the Fund will only disclose your personal information for the purposes for which it was collected.

The organisations and people to whom we may disclose your personal information include:

- Our service providers and any of their sub-contractors, for the purpose of establishing and administering your superannuation and/or pension account(s).
- Insurers and insurance underwriters for the purpose of providing you with an insured benefit.
- Insurers and insurance assessors for the purpose of assessing your insurance claim.
- External agencies which provide services for the purpose of data matching, cleansing or enrichment.
- Medical practitioners and other relevant professionals when you apply for additional insurance cover or make a claim for a disablement benefit.
- Your employer, for the purposes of updating or confirming the accuracy of our records and determining your benefits.
- In the event of your death, your legal personal representative, or any other person who might be entitled to receive your death benefit, or any other person contracted to assist us to process that benefit.

- Financial advisers for the purposes of providing you with financial advice.
- Your spouse or former spouse or their nominated legal adviser in accordance with *Family Law Act 1975* (Cth) requirements.
- Our auditors and other professional advisers.
- MyLife MyAdvice which may provide financial advice to members.
- Government institutions and regulatory authorities including the Australian Prudential Regulation Authority (APRA), the Australian Securities and Investments Commission (ASIC), the Australian Transaction Reports and Analysis Centre (AUSTRAC) and the ATO.
- Courts and tribunals, including the Superannuation Complaints Tribunal (SCT) and the Financial Ombudsman Service (FOS).
- Other superannuation entities in relation to a benefit transfer or rollover (including the administrator of the entity).

Where your personal information is disclosed to service providers and other organisations, the Fund seeks to ensure that your personal information is handled in accordance with privacy laws and is not used or disclosed for purposes other than those for which you have been advised (unless otherwise required or authorised by or under an Australian law or court/tribunal order). Strict procedures are in place to ensure that our service providers have appropriate systems in place to comply with privacy laws and keep your personal information confidential and secure.

Disclosures relating to insurance

If you apply for insurance cover, the Fund supplies the personal information that you provide in the application process, including health information, to our insurer so that they can assess your eligibility for new or increased insurance cover.

If you make an insurance claim, you may need to provide us with additional personal and health information in accordance with our claims procedures. To assess your claim, your personal and health information may be disclosed by our insurer to medical practitioners and other experts nominated by the insurer.

If there is any dispute about your entitlement to insured benefits, the insurer or the Fund may disclose your personal and health information to relevant parties involved in the claim or complaints resolution process.

By signing the relevant application for insurance or claims form, or agreeing via the tele interview process with our insurer, you are consenting to the use and disclosure of your personal and health information for these purposes.

Disclosure to third party associations

The Fund has developed relationships with third party organisations in order to offer you value-added products and services. From time to time, we may use your personal information to contact you about these products and services.

Your personal information will never be added to a general marketing database without your consent. We do not sell, rent or trade your personal information to or with third parties for the purpose of allowing them to send marketing material directly to you.

Disclosure to overseas recipients

Your personal information may be disclosed to service providers outside Australia. Information is only provided to enable the provider to provide the Fund's products and services, such as administration, document storage and data hosting. All reasonable steps are taken to ensure that the overseas recipients of your information do not breach the privacy obligations relating to your personal information. Currently, personal information is disclosed overseas only to Mercer's processing centre in India.

Financial planning services

You may be contacted by MyLife MyAdvice in writing, via email or over the telephone, about how financial planning services may assist you. Financial planning services are offered via the online booking form.

Use of mail houses

The Fund may use mail houses to send you statements, newsletters and/or information about third party products and services. When this occurs, a non-disclosure agreement is signed by the mail house to ensure that your personal information is not disclosed to any other party and remains under the control of the Fund.

Opting out of receiving this additional information

If you do not want to receive marketing material from the Fund, you can contact us using the details located on the last page of this document or use the Unsubscribe function on electronic communications.

Storage and disposal of your personal information

The Fund takes reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

We collect and store your personal information in a combination of secure computer storage facilities and paper-based files and records held in secure premises. A system of passwords and different levels of administration functionality is used to protect your personal information from access by unauthorised personnel. Your TFN is recorded in an encrypted form and destroyed when it is no longer required by law nor administratively necessary to retain.

The personal information you provide to us is only retained for as long as necessary to fulfill the purposes for which the information was collected (unless we are required to retain the information under an Australian law or court/tribunal order). The Fund generally retains health information for many years in order to assist us in the event that a legal dispute arises. In all other circumstances we will take such steps as are reasonable in the circumstances to destroy or de-identify your personal information.

Accessing and correcting your personal information

Access

You have a right to know what personal information the Fund holds about you and to obtain access to it if required. You may access your information via our online based facilities or request access to your personal information by contacting us using the details located on the last page of this document. You may need to provide proof of your identity before access is provided. We reserve the right to charge a reasonable fee to cover any costs incurred in providing you with access to your personal information.

There are circumstances where the Fund is not required to provide, or is prevented from providing, you with access to your personal information. Where access to your personal information has been denied or not provided in the manner reasonably requested, we will provide you with a written notice setting out the reasons for our denial of your request (unless having regard to the grounds for the refusal, it would be unreasonable to do so) and the mechanisms available to you to make a complaint about the refusal.

Correction

The Fund aims to ensure that your personal information is up-to-date and complete. You can update some of your personal details, such as your email, address and phone number using our online based facilities. If you consider that any other information we hold about you is not accurate or up-to-date, we ask that you contact us regarding the proposed changes. We will take reasonable steps to correct any personal information that you believe is inaccurate, out-of-date, incomplete, irrelevant or misleading, having regard to the purpose for which it is being held. You may need to provide proof of your identity before your information is corrected.

Personal information the Fund has disclosed to another organisation will also be corrected at your request unless it is impracticable or unlawful to do so.

If we do not agree with the corrections that you have supplied, we are not required to alter your information. In such circumstances we will provide you with a written notice setting out the reasons for our denial of your request (unless having regard to the grounds for the refusal, it would be unreasonable to do so) and the mechanisms available to you to make a complaint about the refusal. We will not charge a fee to correct your information.

Our online services

If you use our online based facilities, we will collect personal information from you including your name, contact details and changes to your account such as a switch in investment options or a variation in your insurance cover. We can only collect personal information via our website with your consent, as you must log in and/or click on a 'submit' button provided on each web page before any information is recorded.

You can only access the online based facilities with your Membership number or Employer number and a password. Once verified, you will have access to a secure site where all information entered is protected by 128-bit Secure Sockets Layer (SSL) encryption (the highest available level of encryption). You should keep your password secure and change it periodically. You should also ensure that you log off once you have finished accessing the online based facilities to ensure that no one else can access your personal information.

There are security risks in transmitting your personal information via the Internet. You should assess these potential risks before deciding whether or not to use our online services. If you would prefer not to transmit your personal information via the Internet, you can provide it to us by mail or telephone.

Our website

When you browse an unsecured area of the Fund website (i.e. an area where you are not required to log-in), our server records the information provided by your browser for statistical purposes only. We use the information to evaluate our website performance and to continually improve our services. This information includes the date and time of the website visit, the pages accessed and the documents downloaded, the server's IP address and, if you have been referred to this website from another website, the address of the referring site. We will not try and identify individual users or their browsing activities except in the event of an investigation by a law enforcement agency.

In some cases, information is collected by the use of cookies. Cookies are also used to provide you with a better experience of the website, including presenting web pages that are more relevant to your needs. This allows you to access certain restricted pages of our website without the need to log in each time you visit. The information we collect through cookies is never used for marketing purposes.

Interactive tools on our website, such as calculators, often require you to enter personal information. We only retain this information where a calculator or similar tool allows you to save your information and retrieve it at a later time. The information stored will not be ordinarily viewed by the Fund.

From time to time, the Fund website may contain links to third parties' websites. Those other websites are not subject to our privacy policies and procedures. Once you leave the Fund website, the guidelines of this privacy policy no longer apply. You will need to review those websites directly to view a copy of their privacy policies and to ensure your personal information is protected.

Use of your email address

It is our policy to only record and use your email address to communicate with you if you advise us that you wish to receive email communication. Your email address will only be used by us for the purpose for which you have provided it and will not be added to a mailing list. To help us to protect your privacy, always be wary of emails asking you to provide personal information via a hyperlink. We will not use hyperlinks in unsolicited emails asking you to log in to one of our online functions. Instead we will refer you to our website and ask you to log-in to the online based facilities securely.

If you have provided your email address but no longer wish to receive electronic communications from us, you can log in to the online based facilities and update your email profile, or click the Unsubscribe link within the email you received, or contact us using the details provided below.

Contacting us

If you have any questions about this Privacy Policy, if you wish to complain about how the Fund has handled your personal information, or if you wish to access or correct the personal information that we hold about you, please contact our Privacy Officer on:

Phone: 03 9648 4700

**Mail: GPO Box 4303
Melbourne VIC 3001**

If we receive a privacy complaint, it will be treated seriously and dealt with promptly, in a confidential manner, and in accordance with our internal complaints handling procedures.

In the event that your complaint is not resolved to your satisfaction, you may refer your complaint to the Office of the Australian Information Commissioner (OAIC) using the online Privacy Complaints Form, which can be accessed via the OAIC's website at:

oaic.gov.au/privacy/making-a-privacy-complaint

The OAIC can also receive complaints via post, fax or email using the details provided below.

**Post: Office of the Australian Information
Commissioner
GPO Box 5218
Sydney NSW 2001**

Fax: 02 9284 9666

Email: enquiries@oaic.gov.au

If you need help lodging a complaint, you can call the OAIC enquiries line on **1300 363 992**.

Additional information

We reserve the right to modify this Privacy Policy from time to time to reflect our current privacy practices. We will notify you of these changes by publishing them on our website – we will not separately notify you of these changes.

You may request a copy of this Privacy Policy in a particular form and we will take such steps as are reasonable in the circumstances to give you a copy in that form, free of charge. However, should your request for access in a particular form be declined, or an access charge is imposed, we will explain this decision to you.

The information in this document is dated August 2017 and forms part of the Member and Employer Guide Product Disclosure Statement issued by CSF Pty Limited dated 1 October 2016.

Issued by CSF Pty Limited (ABN 30 006 169 286; AFSL 246664), the Trustee of MyLifeMyMoney Superannuation Fund (ABN 50 237 896 957; SPIN CSF0100AU). Catholic Super and MyLife MySuper are divisions of MyLifeMyMoney Superannuation Fund. The information contained herein is general information only. It has been prepared without taking into account your personal investment objectives, financial situation, or needs. It is not intended to be, and should not be construed in any way as investment, legal or financial advice. Please consider your personal position, objectives, and requirements before taking any action.