



Creating financial independence since 1846

# Privacy Policy

30 January 2015

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# 1 Overview

Protecting clients' privacy is very important to us. To ensure our compliance with the *Privacy Act 1988* (Cth) (the Privacy Act) and as part of our commitment to ensuring the safety of our clients' private and confidential information, we have established and implemented this Privacy Policy (the Policy).

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles (APPs), which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations in the private sector.

## Purpose

The Policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the APPs.

## Scope

IOOF Holdings Ltd, its subsidiaries and associates are referred to in the Policy as "IOOF", "us", "our", or "we".

# 2 Collection

## What information do we collect?

We will collect and hold your personal information for the purposes of:

- providing advice, products and services to you
- managing and administering the products and services
- letting you know about our other products and services.

The type of information collected from you includes information that is necessary to operate your account or for us to provide advice to you. We may ask you to provide personal information such as your:

- name
- e-mail address
- residential and/or postal address
- date of birth
- telephone number
- occupation
- bank account details
- financial details
- employer
- tax file number (TFN).

This information is collected from application forms you have completed, your use of our online facilities or through ongoing communications with you.

We will not solicit any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. Third parties that we may need to collect information from include your financial adviser, product issuer, employer, accountant or solicitor.

There are specific circumstances in which we will ask for your consent to provide sensitive information such as:

- personal health information from you when you apply for insurance or from medical practitioners when you make a claim
- income information from employers when you apply for additional insurance protection or salary continuance insurance
- details of your dependents, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993* (Cth), to pay benefits in the event of your death.

We will inform you of any legal requirements for us to ask for information about you and the consequences of not giving us that requested information. For example, in addition to the personal information we will obtain from you, whenever you acquire a new product or service from us, we will require documents evidencing your identity. Such evidence may include a certified copy of your driver's licence, passport or birth certificate.

### What if you do not give us the information we request?

You are not obligated to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is not complete or accurate, this may:

- prevent or delay the processing of your application or claim
- affect your eligibility for specified insurance cover
- prevent us from contacting you
- impact the taxation treatment of your account.

For example, we are required to ask for your TFN when you become a member of one of our superannuation products. If you choose to not give us your TFN, you may be subject to higher tax charges on your superannuation and we may not be able to accept personal contributions.

## 3 Use of information

### How do we use the information that we collect from you?

We use your personal information for the purpose for which it has been obtained. We collect your personal information so that we are able to act on your request, such as to:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits
- report the investment performance of your account
- keep you up to date on other products and services offered by us.

## 4 Disclosure

### Who do we give your information to?

We may provide your information to other related companies within the IOOF Group or external parties. Where personal information is disclosed, there are strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we may disclose your personal information include:

- organisations involved in providing, managing or administering our products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers, or mail houses
- your financial adviser
- your employer (relates only to employer sponsored superannuation arrangements)
- funds (administrators or trustees) to which your benefit is to be transferred or rolled over
- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or any other person who may be entitled to receive your death benefit, or any person contacted to assist us to process that benefit
- financial institutions that hold accounts for you
- professional advisers appointed by us
- businesses that may have referred you to us (for example your Credit Union).

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

We may also disclose your information if you give your consent.

## Will my information be disclosed overseas?

We may disclose your personal information to our related companies within the IOOF Group located in Australia (and, only if necessary to provide your services to you, New Zealand). Otherwise, it is unlikely that we will disclose your personal information overseas. A few of our subsidiaries or associates use offshore outsourcing services (the individual privacy policy of those entities lists any country where an overseas disclosure is likely). Any overseas disclosure does not affect our commitment to safeguarding personal information we collect and we will take reasonable steps to ensure overseas recipients comply with the APPs.

## 5 Access and correction of information

### Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. We may charge a reasonable fee to cover our costs.

There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we are required to give you a written notice to that effect and a statement if requested.

If you wish to access or correct your personal information, you may contact us through our offices or by writing to the Privacy Officer, whose contact details are set out in section 9 below.

## 6 Complaints

If you believe that we have breached the APPs by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out in section 9 below.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a complaint with the Information Commissioner.

You can lodge a written complaint with the Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: [www.oaic.gov.au](http://www.oaic.gov.au)
- Submitting a hard copy form which can be obtained at [http://www.oaic.gov.au/images/documents/privacy/privacy-complaints/making-a-privacy-complaint/Privacy\\_Complaint\\_Form.docx](http://www.oaic.gov.au/images/documents/privacy/privacy-complaints/making-a-privacy-complaint/Privacy_Complaint_Form.docx)
- fax to 02 9284 9666
- email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

## 7 Protection of the personal and sensitive information that we hold

### How do we protect the security of your information?

We have security systems, practices and procedures in place to safeguard your privacy. We may use cloud storage or third party servers to store the personal information we hold about you. These services are subject to regular audit and the people who handle your personal information have the training, knowledge, skills and commitment to protect it from unauthorised access or misuse.

If you use the secure adviser, member or employer sections of our websites, we will verify your identity by your username and password. Once verified, you will have access to secured content.

### Risks of using the internet

You should note that there are inherent security risks in transmitting information through the internet. You should assess these potential risks when deciding whether to use our online services. If you do not wish to transmit information through our website, there are other ways in which you can provide this information to us. You can, for example, contact our Customer Service team. Refer to section 9 for our Customer Service contact details.

### Cookies

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

## 8 General

### How long do we retain your personal information?

We are required by law to retain certain records of information for varying lengths of time and, in certain circumstances, permanently. Where your information is not required to be retained under law, we will take reasonable steps to irrevocably destroy or de-identify your personal information when it is no longer required for the purpose for which it was collected.

### Updates to this Privacy Policy

Unless required earlier, this Privacy Policy is reviewed and updated annually. The most current version of the Privacy Policy can be obtained from our website at <http://www.ioof.com.au/privacy>.

## 9 How do I contact the Privacy Officer or Customer Service?

You can contact the Privacy Officer by:

Mail: Privacy Officer  
IOOF  
GPO Box 264  
Melbourne VIC 3001

Or by email: [Privacy.Officer@ioof.com.au](mailto:Privacy.Officer@ioof.com.au)

You can contact the Customer Service Department by telephoning **13 13 69**

## 10 Document release information

### File details

<b>File name</b>	Privacy Policy – Revised – January 2015 FINAL
<b>Description</b>	Privacy Policy
<b>Original author(s)</b>	Unknown
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<b>Current revision author(s)</b>	Kimberly Lunday
<b>Document owner</b>	Kimberly Lunday

### Revision history

Version	Revision Date	Author(s)	Revision Notes
2.0	October 2009	Andrea Lock	Update of Privacy Policy to incorporate changes to the business
2.1	January 2011	Andrea Lock	Inserted reference to new Office of the Information Commissioner and updated contact details section (section 8).
2.2	September 2012	Emma Brooker	Updated IOOF Group contact details and updated Disclosure to capture FATCA.
2.3	December 2013	Emma Brooker	Updated to incorporate changes to privacy law effective March 2014 and updated IOOF group contact details.
2.4	December 2014	Kimberly Lunday	Updated scope, overseas disclosure statement, one Privacy Officer contact, one Customer Service contact, and to reflect recommendations of our internal audit.

### Approval

Approval Date	Approved By	Notes
26 October 2009	IOOF Holdings Ltd Board	Approved without amendment.
29 January 2015	IOOF Holdings Ltd Board	Approved without amendment.