



Privacy policy

LGIAsuper Trustee
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RSE Licence No. L0000178

as trustee for

LGIAsuper
ABN 23 053 121 564
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Introduction

The purpose of this document is to outline the Privacy policy of LGIAsuper. References to LGIAsuper throughout this policy are to be read as referring to all entities within the LGIAsuper group.

LGIAsuper is committed to ensuring the privacy of personal information of members of LGIAsuper, other persons with whom we have dealings and our employees and directors.

LGIAsuper is subject to the *Australian Privacy Principles* (APPs) which are privacy standards set out in the *Privacy Act 1988* (Act). The APPs set out standards, rights and obligations in relation to handling, holding, accessing and correcting personal information.

The APPs are structured to reflect the personal information lifecycle. They are grouped into five parts:

- Part 1 — Consideration of personal information privacy (APPs 1 and 2)
- Part 2 — Collection of personal information (APPs 3, 4 and 5)
- Part 3 — Dealing with personal information (APPs 6, 7, 8 and 9)
- Part 4 — Integrity of personal information (APPs 10 and 11)
- Part 5 — Access to, and correction of, personal information (APPs 12 and 13).

Privacy policy objectives

The primary objectives of LGIAsuper's Privacy policy are to:

- i) Protect the privacy of LGIAsuper members, Trustee staff and other persons with whom we have dealings.
- ii) Demonstrate that LGIAsuper will only collect personal information that is required to administer our products and services.
- iii) Establish policies and procedures to ensure personal information is managed in an open and transparent manner.
- iv) Maintain the confidentiality of personal information through strong internal procedures and robust system security.
- v) Comply with the requirements of the *Privacy Act 1988* including the *Australian Privacy Principles*.

Responsibility

The Trustee has ultimate responsibility of LGIAsuper's compliance with regulatory requirements including the Act. The Trustee has delegated the responsibility for monitoring the compliance of LGIAsuper's operations to the Audit & Risk Management Committee (ARMC).

LGIAsuper has established and will maintain an appropriate and effective compliance framework within the organisation. The Trustee has charged the Risk Management & Compliance Function (RMCF) with the responsibility for management of the compliance program. The RMCF shall report through the CEO on all compliance issues.

LGIAsuper Privacy policy

Regulatory requirements

APP 1 – *open and transparent management of personal information* – clause 1.3 requires an organisation to have a clearly expressed and up to date policy about the management of personal information by the organisation. This policy has been prepared to meet this requirement.

Clause 1.5 requires an organisation to take reasonable steps to make its policy available free of charge and in such form as is appropriate. The clause notes that the policy will usually be made available on the organisation's website. Clause 1.6 enables a person or body to request a copy of the policy in a particular form and requires the organisation to take reasonable steps to provide a copy in that form.

This policy will be available for download from LGIAsuper's website at www.LGIAsuper.com.au. You can also request a copy free of charge by calling LGIAsuper on 1800 444 396. A copy will be provided by post, fax or email. If you have questions about this policy you can contact LGIAsuper on the above number or by email to info@LGIAsuper.com.au.

What is 'personal information'?

Personal information has the meaning given to it under the Act. In general terms, personal information is information or an opinion, whether true or not, about a person whose identity is apparent from the information or opinion.

Personal information includes any information we collect from you directly or from another party such as your employer, to administer our products and services or to provide employment to you. It includes your name, address, date of birth, Tax File Number, contact details and any other information you provide to us either directly or through a website, a third party or via a service provider.

Personal information also includes 'sensitive information'.

What is 'sensitive information'?

Sensitive information is information or an opinion about your racial or ethnic origin, political opinions, religious beliefs, membership of a professional association or trade union, sexual preferences, criminal record, health information or genetic information.

LGIAsuper will not collect sensitive information about you without your consent and only where the information is reasonably necessary to administer our products and services or for your employment with us. Exceptions will apply where the information is required under Australian law or in other circumstances under the Act.

LGIAsuper will collect health information about you in order to provide death and disability insurance.

Collection of your personal information

We are required to collect your personal information when establishing and administering LGIAsuper's products and services or upon commencement and throughout your employment with LGIAsuper. The information which may be collected includes:

- Name
- Address
- Date of birth
- Contact details
- Health and medical information relevant to LGIAsuper's insurance products.
- Financial information relevant to advice being provided to you.
- Any other information collected directly from you through our website (which is hosted in Australia), through the use of our website or online presence such as 'cookies', or other applications or web-based services
- Gender
- Tax File Number
- Salary
- Employment details

Most personal information is collected from you or from your employer. Personal information may also be collected from a third party such as another superannuation fund, a recruitment agency, your financial advisor or another personal representative, as well as publicly available sources. If we collect personal information about you from somebody else, we will take reasonable steps to make sure you and the other party are aware of this policy in relation to the information we collect.

In the event we receive unsolicited personal information about you from other sources, we will destroy or de-identify the information as soon as practicable if it is lawful and reasonable to do so.

Why do we collect your personal information?

We only collect personal information about you where it is necessary to establish and administer LGIAsuper products and services on your behalf and to keep you up to date with important changes that could affect your super or your insurance. We also collect personal information from non-members to provide information about LGIAsuper's products and services. We handle your information with the highest level of care and in line with the Act and the APPs. Where it is reasonable and practical we will collect the information directly from you.

If you decide not to provide your personal information to us, we may not be able to provide you with our products or services. Many of our products and services require us by law to collect your personal information to identify who we are dealing with.

We will notify you when we collect your personal information from a third party and why it has been collected.

Can you deal with us anonymously or using a pseudonym?

We appreciate that at times you may wish to deal with us in an anonymous manner or by using a pseudonym. Generally we do not allow anonymity or the use of pseudonyms as it is impractical to deal with persons who have not identified themselves especially when such dealings are related to their membership of LGIAsuper or their employment with us.

Where it is possible, for example when providing general advice about the fund, LGIAsuper will allow persons to remain anonymous or use a pseudonym. This will not be possible where we are required or authorised under an Australian law or court to require persons to identify themselves for the services to be provided.

LGIAsuper prides itself on the personal service we provide to our members. Personalising the service normally requires us to identify whom we are dealing with

How we use and disclose your personal information

LGIAsuper collects, uses and discloses your personal information generally to establish and administer its products and services or provide you with employment.

Your personal information is primarily used by us to:

- start and maintain a correct superannuation account/record for you;
- identify you and your superannuation entitlements;
- accurately calculate the amount of benefit you should receive;
- assess, manage and pay any claims you may be entitled to, including claims that contain an insured component;
- communicate with you and provide advice about your superannuation and insurance cover;
- assess and manage an employment application and your ongoing employment if you are offered employment with LGIAsuper.
- provide information to you about LGIAsuper's products and services.

Your personal information may also be:

- disclosed by us to our insurers so we can provide you death and disability insurance cover;
- used by us or a trusted supplier to undertake market research with you;
- used by us to search the Australian Taxation Office's lost member register;
- disclosed by us to our trusted suppliers such as mailing houses or market research organisations so they can complete a business activity for us;
- disclosed by us to government agencies to comply with legislation (such as the *Income Tax Assessment Act 1997*);
- disclosed by us to software administrators and assurance providers so that they can complete a business activity for us;
- used or disclosed for another purpose that is related to LGIAsuper's functions or activities.

If you do not want us to use your personal information for marketing and research purposes you can opt out at any time by contacting us.

We will not sell or lease your personal information to third parties. We will only distribute your personal information when required by law.

We may disclose your personal information to your financial advisor or other third party but only after you have provided us with your explicit authorisation for that disclosure to occur. Such authorisation is required in writing and you will be required to provide proof of identity before the authorisation is accepted.

LGIAsuper may be required to collect and use certain government related identifiers such as your Tax File Number or Centrelink reference to provide certain services to you. LGIAsuper does not adopt government identifiers as an identifier of persons. We will not use government identifiers in any way which is inconsistent with the purpose for which they were originally issued unless it is authorised by Australian law or by a court or tribunal order.

Why do we collect sensitive information?

We only collect sensitive information about you if:

- you consent to it;
- it is required for one or more of the purposes previously outlined;
- the collection is authorised under the Act.

We know this information is deeply personal and private and take extreme care in handling and protecting it from unauthorised access. When collecting sensitive information, we will specify the purpose for its collection and provide an undertaking to use the information for that purpose only.

Can you access your personal information held by LGIAsuper?

If you have registered, you can access your personal account information through LGIAsuper online at any time. In this secure member area on our website you can check details such as your date of birth, address and account information. You can also make some changes to some of these details if you need to.

If you don't have internet access or have not yet registered to use LGIAsuper online, you can check and change your details by contacting us on 1800 444 396. Please note we will have to conduct an identity check to establish your identity prior to considering any changes.

If you believe personal information we hold about you is inaccurate, incomplete or not up-to-date, we will take steps to correct it at no charge. Sometimes changes to your information cannot be made. If we do not correct or change the information we hold about you when you ask us to we will give you a written notice including reasons for refusal, generally within 30 days of the request. If you are not satisfied with the reasons given you may submit a complaint to LGIAsuper's Complaints Officer. You can also request us to attach a statement with your personal information record stating that you believe your personal information¹¹¹ held with us is inaccurate, out-of-date, incomplete, irrelevant or misleading.

There may be some situations where we will not be able to provide you with access to your personal information which we hold. The situations may include where the access would have an unreasonable impact on the privacy of others, the information relates to existing or anticipated legal proceedings, giving access would be unlawful, or, we have reason to suspect that unlawful activity or misconduct of a serious nature is being or may be engaged in. LGIAsuper's Complaints Officer can advise if any of these situations apply to your circumstances.

Can your personal information be disclosed overseas?

LGIAsuper does not outsource any of its primary business functions to a service provider located overseas.

However, we engage third parties to provide services to us that support our primary functions of providing products and services to you. These business partners or service providers may be located overseas and may not be subject to Australian Privacy laws or standards.

Further, our insurers for death and disability benefits may disclose information they receive from LGIAsuper, or directly from you, to recipients (including business partners, service providers and related companies) which are located outside Australia and/or are not established in or do not carry on business in Australia.

The insurer will provide you with a copy of its privacy statement when collecting your personal information. The insurer is required to comply with the Act and the APPs.

Recipients of your personal information supplied by us to provide you with products and services, including insurance benefits, may be located in the Philippines, China, India, Fiji, New Zealand, USA, Japan, South Africa, Singapore and members of the European Union.

Can your personal information be used for direct marketing?

LGIAsuper may use your personal information for sending you marketing materials and information about our products and services. The materials may be sent in various forms including email, mail, fax, SMS and social media. If you have a preference for the type of communication used we will endeavour to use that type whenever practical to do so. Personal information collected from you may be used to provide updates and promotional information about LGIAsuper and its products and services, such as upcoming sponsorship events.

If you wish to opt out of receiving marketing materials you should contact LGIAsuper by email – info@LGIAsuper.com.au – or by calling 1800 444 396.

LGIAsuper will not share or provide your personal information to other organisations other than as provided in this policy.

Is your personal information secure?

LGIAsuper is committed to protecting your personal information and we use and maintain appropriate systems and safeguards to protect it from misuse, interference and loss, unauthorised access, modification or disclosure. We have a number of measures in place to protect your personal information such as information technology systems and internal administrative and personnel processes.

In addition, we destroy or permanently de-identify personal and sensitive information that is no longer needed for the primary or secondary purposes above or no longer required to be kept by an Australian law or a court or tribunal order.

Is your personal information secure on the internet?

LGIAsuper takes care to protect the information you give to us on our website. We put in place appropriate safeguards to prevent unauthorised access to or use of your personal information. We also use and maintain appropriate systems and safeguards to protect your personal information which may be transmitted over the internet.

LGIAsuper may use 'cookies' and 'pixel tags' to store information provided by your browser when you access our website. This can include the type of device you use to access our website, date and time of your access, your geographic location, the pages you visit and any downloads you make. This enables us to keep track of our products and services that you show interest in, unless you have opted out, so that we can design our communications and advertising along lines more popular with our members and other users.

The LGIAsuper website may contain links to other websites operated by other parties. LGIAsuper makes no representations or warranties in relation to the policies and procedures adopted by these parties and we will not bear any responsibility for their privacy policies or the content of these sites.

As a user of the internet, you should take responsibility for the security of any personal information you transmit over the web to prevent unauthorised use of the information.

Procedures you should adopt include:

- Keeping your account numbers, passwords and PIN numbers secure and not divulging them to anyone;
- Notifying any organisation, including LGIAsuper, with whom you transact business over the internet using a password or PIN number if you believe that the PIN number or password or your account number has been compromised.

What happens if my privacy is compromised?

Whilst we make every effort to secure your personal information, there is always a risk that your personal information may be compromised through:

- lost or stolen laptops, removable storage devices, or paper records containing your personal information;
- hard disk drives and other digital storage media being disposed of or returned to equipment lessors without the contents first being erased;
- databases containing your personal information being 'hacked' into or otherwise illegally accessed by individuals outside of LGIAsuper;
- LGIAsuper employees accessing or disclosing personal information outside the requirements or authorisation of their employment;
- paper records stolen from insecure recycling or garbage bins;
- LGIAsuper providing your personal information to the wrong person, for example by sending details out to the wrong address, and
- an individual deceiving us into improperly releasing the personal information of another person.

We have processes in place to minimise the possibility of such events occurring. However, in the event we detect that your personal information has been or may have been compromised, we will inform you as soon as we become aware to minimise any harm to you.

We will tell you:

- how your personal information was compromised;
- the kinds of personal information that were lost or stolen; and
- provide you with recommendations about the steps that you can take in response to the breach.

We also may be required to inform the Privacy Commissioner in certain circumstances.

Enquiries and complaints

LGIAsuper is passionate about giving you the personal service you want. If you have any questions please call our friendly Information Services Team on 1800 444 396 or email – info@LGIAsuper.com.au.

Like you, we take the privacy of your personal information very seriously. If you have a concern about the way your privacy has been managed please contact our Complaints Officer immediately by:

Phone: 1800 444 396
Email: complaints@LGIAsuper.com.au
Post: Complaints Officer
LGIAsuper
GPO Box 264
Brisbane QLD 4001

If, after raising your concerns you are not happy with the outcome you can contact the Office of the Australian Information Commissioner at www.privacy.gov.au or on 1300 363 992 (for the cost of a local call).

Review

LGIAsuper shall review the Privacy policy at least annually. Any changes to the framework must be approved by the CEO prior to submission to the Trustee.

Every 3 years the policy shall be subject to review by the internal auditor. Any recommendations for changes to the framework shall be submitted to the CEO for approval prior to submission to the Trustee for final approval.

Members and others are encouraged to check the LGIAsuper website for any changes to this policy.