



Privacy Policy and Privacy Collection Statement

Telstra Super Pty Ltd, the trustee of the Telstra Superannuation Scheme (TelstraSuper), 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 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;
- tax file number;
- bank details;
- social security information;
- details about your citizenship, residency or visa status;
- occupation;
- employment details including name of employer, salary, superannuation contributions, and employment status;
- name, address and relationship to you of the person/s you have nominated as beneficiaries of your superannuation benefit in the event of your death;

- financial information such as;
 - other superannuation arrangements;
 - details of your dependants and family relationships, your insurance cover, and health status;
 - your income, expenditure, and saving patterns;
 - your investments, assets, and liabilities; and
 - your objectives, financial situation and needs; and
- any other personal information required by law.

This personal information is generally collected directly from you or from your employer when you become a TelstraSuper member.

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. if you claim a benefit payment or commence an income stream).

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.

Health information is collected from you when you apply for insurance cover (except for default cover) through our group life and group income protection insurer (Insurer)*, from you, and others such as your medical practitioners, medical facilities, current or former employers, health authorities, medico-legal advisers, workers' compensation authorities, transport/motor accident commissions, insurers, claims assessors and underwriters if you make an insurance claim. We only collect your health information with your consent or where we are required or authorised to do so by law.

We may also collect your personal information:

- when you access and use your SuperOnline account;
- when you talk to our Member Contact Centre consultants or attend a seminar run by our Member Education staff;
- from your authorised representative or agent;
- from your employer about changes to your employment status and the contributions they make to TelstraSuper on your behalf;
- from other superannuation funds when you rollover or transfer your benefit;
- 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.

Employers

If you are an employer who pays superannuation contributions into TelstraSuper for your employees, we may collect basic contact information directly from you about staff we can contact to discuss or resolve issues in relation to TelstraSuper or your employees' membership in the fund. This includes the name, work email and work telephone number of individuals you nominate for such purposes. Where we are unable to obtain those contact details from you, we may obtain those details from other sources.

Why we collect your personal information and how we use it

We collect your personal information to:

- establish, administer and manage your TelstraSuper account;

- assist you with locating other superannuation accounts in your name (if any) and consolidating those accounts into your TelstraSuper account;
- use in the preparation of illustrating your retirement benefit and related options in the superannuation calculators available on your SuperOnline website;
- provide you with insurance cover;
- comply with superannuation, taxation and other applicable laws;
- inform you about the products, services and benefits available to you (or for employers, your employees) as a TelstraSuper member;
- verify your identity under our internal security verification procedures and anti-money laundering legislation;
- provide you with Member Education services;
- comply with court orders in relation to Family Law and superannuation matters;
- consider and deal with any complaints you may make;
- consider and deal with any insurance claims you may make;
- undertake research and conduct surveys to improve the products, benefits and services available to TelstraSuper members; and
- provide for your safety and security when you visit us at our offices.

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

- about the products, services and benefits available to you (or for employers, your employees) as a TelstraSuper member;
- about the financial planning services available to TelstraSuper members through Telstra Super Financial Planning Pty Ltd;
- to gain an understanding of your information and communication needs so we can provide you (or for employers, your employees) with improved products, services and benefits; and
- to ask you to take part in research and surveys about our products, services and benefits.

We may also use your personal information to undertake activities for a purpose related to a purpose listed above including, if you use the financial planning services available through Telstra Super Financial Planning Pty Ltd, we will disclose information to Telstra Super Financial Planning Pty Ltd for the purpose of providing you with those services.

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 or your online account (SuperOnline). 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 you.

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

TelstraSuper will never contact you to ask for your login details, nor send an SMS or email asking you to update your personal information. If you're unsure of the authenticity of a message from TelstraSuper, call us directly.

If you do not provide some or all of your personal information to us, we may not be able to establish, administer or properly manage your TelstraSuper account or provide certain services or benefits to you or your beneficiaries. For example, we are required under the

Superannuation Industry (Supervision) Act 1993 (Cth) to collect your tax file number before we can accept any post-tax contributions from you. If you do not provide your tax file number, we will be unable to accept any post-tax contributions from you and additional tax will be deducted from any employer or salary sacrifice contributions made by you or on your behalf. If you choose not to provide some or all of your health information, it may not be possible to obtain the insurance cover you seek or for your insurance claim to be assessed.

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 or third parties, including:

- the Australia Taxation Office;
- our Insurer;
- mailing houses;
- your authorised representative;
- your former spouse in relation to Family Law and superannuation matters;
- your beneficiaries, employer and legal adviser in the event of your death;
- Telstra Super Financial Planning Pty Ltd;
- third party service providers with whom we have commercial relationships for business and related purposes; and
- other superannuation funds if you rollover or transfer your benefit.

We disclose your personal information, including your health-related information, to our Insurer so they can administer your insurance cover. If you make an insurance claim, our Insurer may disclose your personal information to other relevant third parties such as medical practitioners, medical facilities, claim assessors, underwriters, re-insurers, medico-legal advisers, fraud detection agencies and other service providers for the purpose of issuing or administering your insurance cover or assessing any insurance claim that you may make.

We may also disclose your personal information to:

- our professional advisers including legal and taxation advisers, auditors, actuaries, accountants and professional indemnity insurers;
- your employer;
- the Australian Financial Complaints Authority (AFCA);
- the Office of the Australian Information Commissioner (OAIC);
- the Australian Securities and Investments Commission (ASIC);
- the Australian Prudential Regulation Authority (APRA);
- 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;
- interpreting and translation service providers; and
- data validation service providers.

We take all reasonable steps to ensure that 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 products, benefits, services or other opportunities available to members of TelstraSuper 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 or your online account (SuperOnline). If you do not wish to receive these types of communications from us, please update your marketing subscription preference via your SuperOnline account, call us on **1300 033 166** or use the opt-out facility in the communication.

We do not provide 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 and products to you, your personal information may be transferred or disclosed overseas. This is because some service providers connected to the administration of member accounts and other services we provide 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 in place and take all reasonable steps to ensure that your personal information in both electronic and/or hard copy 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 it within 30 days. 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 if the request is frivolous or vexatious. If this is the case, we will provide you with written reasons for the refusal.

There may also be circumstances where we cannot release your personal information that was provided to us by a third party e.g. from a medical practitioner. Should this occur, we may refer you to the third party to access the information directly.

Correcting your personal information

We rely on your personal information being complete, up-to-date and accurate in order to establish, administer and manage your TelstraSuper account and provide you with products, services and benefits. We encourage you to keep your personal information up to date by promptly notifying us of any changes. This can be done by:

- updating your personal information via your SuperOnline account;
- completing a Change of Contact Details form available from the TelstraSuper website; or
- calling a Member Contact Centre consultant on **1300 033 166**.

If you believe that any personal information we hold about you is incorrect, incomplete or inaccurate you can 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. 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 member records, including addresses and telephone numbers, to improve the accuracy and integrity of the personal information we hold about TelstraSuper members.

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 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/privacy-complaints>.

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 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 2 June 2023.

*MLC Limited (MLC Life Insurance) is TelstraSuper's main group life and group income protection insurer from 1 July 2020. Our former insurer, TAL Life Limited, is responsible for insuring a small number of claims. Reference to TelstraSuper's "Insurer" is a reference to both MLC Life Insurance and TAL Life Limited, as applicable.