



Privacy Policy

Local Government Super

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Version 6

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1. Policy Statement

The Trustee, on behalf of LGS, must only collect, retain, use and disclose Personal Information necessary for the efficient operation of its activities and under strict controls as detailed in the *Privacy Act 1988 (Cth)*, particularly the Australian Privacy Principles.

2. Definitions

Administrator	means the entity appointed as the administrator of the Fund, which at the date of this Policy is Australian Administration Services Pty Limited, as amended from time to time.
AFCA	means the Australian Financial Complaints Authority.
APP	means the Australian Privacy Principles as defined in the <i>Privacy Act 1988 (Cth)</i> .
Fund	means the superannuation fund known as Local Government Super (ABN 28 901 371 321) governed by the Trust Deed.
Insurer	has the meaning given to that term in Annexure C of the Fit and Proper Policy.
LGS	means the Fund.
Personal Information	means information or an opinion (including information or an opinion forming part of a database), whether true or not, and whether recorded in a material form or not, about an individual whose identity is apparent, or can be reasonably ascertained, from the information or opinion.
Policy	means this LGS Privacy Policy as amended from time to time.
Privacy Officer	means the person appointed by the CEO (under delegated authority from the Board) to manage privacy within LGS, who is responsible for handling internal and external privacy enquiries, complaints, and access and correction requests.
Trustee	means LGSS Pty Limited, as trustee of the Fund.
Trust Deed	means the trust deed that established the Fund dated 30 June 1997, as amended from time to time.

3. Purpose

- (a) As a complying superannuation fund, LGS is required to collect, hold and use your Personal Information which is reasonably necessary for, or directly related to, our functions and activities. Such information may include:
- (i) your name and date of birth;
 - (ii) contact details;

- (iii) tax file number;
 - (iv) employment and employer details;
 - (v) contribution history; and
 - (vi) beneficiary details etc.
- (b) Should you seek to take advantage of our financial planning services, LGS is required to collect additional Personal Information so that LGS can provide you with financial advice and comply with its obligation under the financial services laws. Some of this information may include:
- (i) details of your assets and liabilities;
 - (ii) salary or other income producing sources;
 - (iii) your financial/retirement expectations;
 - (iv) insurance details; and
 - (v) whether you have a will and/or power of attorney.
- (c) In order to provide you with certain services we may collect your sensitive information. Such collection will only occur with your consent, unless we are required or permitted to collect this information without your consent.

4. Collection

4.1 Purpose of collection

- (a) LGS collects, holds and uses your Personal Information where the information is reasonably necessary for the purposes of:
- (i) admitting you as a member of LGS;
 - (ii) managing and administering your LGS membership and superannuation benefits;
 - (iii) providing general and personal financial advice;
 - (iv) letting you know about other related services and benefits in connection with your membership;
 - (v) undertaking market research, member data analysis and direct marketing activities; and
 - (vi) helping you to trace different superannuation accounts you may have and if requested, consolidate them.
- (b) You are not under any obligation to provide us with your Personal Information. However, if you choose to not provide us with your Personal Information, or you provide us with information which is incomplete or inaccurate, this may:
- (i) prevent or delay the processing of any applications made to LGS;
 - (ii) affect your ability to apply for insurance or make an insurance claim;

- (iii) prevent us from providing a financial service to you;
 - (iv) prevent us from contacting you; or
 - (v) affect the manner in which your account is taxed.
- (c) By way of an example, as a member of LGS we will request that you provide us with your Tax File Number. While you may refuse to provide us with this information, doing so may subject you to higher tax charges on your superannuation and may prohibit us from accepting after-tax contributions you wish to make.

4.2 Method of collection

- (a) LGS collects your Personal Information only by lawful and fair means and would generally collect such information from you directly through application forms, client introduction packs which are used for financial planning, use of our website, other online services, emails, and through direct communication with you. Additionally, if you are an employer-sponsored member, we may also collect your Personal Information from your employer.
- (b) In order to provide you with certain services, for instance insurance, it may be necessary for LGS to request Sensitive Information from you or from third parties. This information may include personal health information from you or your medical practitioners when applying for, or making an insurance claim.
- (c) Once collected, your Personal Information is maintained in secure databases operated by our Administrator on our behalf.

4.3 Website and emails – Collection of information

- (a) LGS's online channels (including www.lgsuper.com.au, Member Online and emails) have been designed to provide you with information regarding LGS, performance information, superannuation information, and incorporates our Member Online which allows you to log on to view details of your superannuation account.
- (b) Whenever the online content is viewed, certain information regarding the user's navigation is collected by LGS. This information is designed to assist LGS to understand, and better meet the interests of its users. The type of information that LGS may collect includes the:
 - (i) type of information or documentation that was downloaded or viewed;
 - (ii) time and date of use; and
 - (iii) browser information and server address.
- (c) Although this information is collected through your use of our online content, the information collected does not identify you and is limited to the manner in which online content is used, except for where you elect to provide us with your information through the "Email Form", "Seminar Booking Form" or similar forms or when you view content that was disclosed only to you. Our website also includes a number of calculators, use of which may require you to enter your personal details. We will not retain those details.
- (d) An internet "cookie" is a small piece of data sent from a website which is stored on a user's computer. Cookies are used for security and personalisation purposes. Should you choose to reject these cookies, you are able to do so through changing the settings in

your internet browser although doing so may affect the manner in which you are able to access the website.

- (e) Cookies are also used to provide information about your usage of our website (such as which pages you visited) to third party service providers for the purpose of serving relevant ads to you across the Internet. The information provided to third party ad servers is not personally identifiable. For information about how to opt out of cookies being used by third party ad servers, visit networkadvertising.org/choices.

4.4 Relevant Laws

As a superannuation fund, LGS is required under various laws which may require that LGS collect, hold or use your Personal Information for identification purposes. Such laws include the *Superannuation Industry (Supervision) Act 1993* (Cth), the *Anti-Money Laundering and Counter Terrorism Financing Act 2006* (Cth), the *Taxation Administration Act 1953* (Cth), the *Privacy Act 1988* and the *Privacy (Tax File Number) Rule 2015* (TFN Rule) and their associated regulations.

4.5 Unsolicited information

If we receive Personal Information that we have not solicited, and we determine that we could not have collected that information under the *Privacy Act 1988*, then we will de-identify or destroy the information if it is reasonable and lawful to do so.

5. Use and disclosure

- (a) LGS will only use or disclose your Personal Information for a purpose:
 - (i) discussed within this Policy;
 - (ii) for which you would reasonably expect which is related to the purpose for which the information was collected;
 - (iii) that is required or authorised by law; or
 - (iv) for which you have consented.
- (b) Any and all use and disclosure of your Personal Information will be at all times in compliance with the *Privacy Act 1988*, and in particular, the APPs.
- (c) In order to be able to provide our services to you, LGS will disclose your Personal Information to our Administrator for the purposes of administering your LGS superannuation accounts. In order to ensure the manner in which your Personal Information is used, disclosed and secured by the Administrator, LGS has entered into a binding contractual agreement with the Administrator which, amongst other things, requires that the Administrator comply with the *Privacy Act 1988* and only use and disclose Personal Information for the purpose of fulfilling its obligations under the contractual agreement.
- (d) LGS may also disclose your Personal Information to:
 - (i) our Insurer, for the purposes of providing you with insurance;
 - (ii) our financial planners when you are seeking financial advice from LGS;
 - (iii) other superannuation trustees;

- (iv) if relevant, our service providers, which may include our auditors, accountants, lawyers, mail houses, research companies etc; and
 - (v) if required, to government or regulatory authorities.
- (e) Some third party service providers may be located overseas, or perform all or part of their contracted responsibilities from an overseas location. In making that disclosure, LGS seeks to ensure those third parties are subject to strict controls including imposing contractual obligations that protect your personal information from unauthorised use or disclosure, and to limit their use of your personal information to the extent necessary to fulfil their contracted responsibilities.
 - (f) If LGS is required to disclose Personal Information to an entity under law, LGS will ensure that a notation of this disclosure is made on your file unless lawfully asked to refrain from doing so.

6. Access and correction

- (a) You may request access to the Personal Information we hold about you by contacting Member Services on 1300 LGSUPER (1300 547 873) and we may recover our reasonable costs in relation to your request for access.
- (b) If we are unable to provide you with the access that you request, we will provide you with written reasons as to why your request has been refused and direct you to the APP under which the refusal is supported.
- (c) LGS takes reasonable steps to ensure that the Personal Information it collects, holds, uses or discloses is accurate, complete and up to date. Where we believe that your Personal Information is inaccurate, incomplete or out of date we will take reasonable steps to correct such information.
- (d) If you believe that the Personal Information we hold about you is incorrect, incomplete or out of date, you may request us to update such information. We will respond to your request within a reasonable time, however, should we disagree with the corrections you have requested, we are permitted to refuse your request for correction, following which we will provide you with written reasons as to why.

7. Protection and personal information

- (a) LGS takes the security of your Personal Information very seriously and has security systems, practices and procedures in place to safeguard your privacy. As our Administrator holds your Personal Information, LGS requires that the Administrator undertake reasonable security measures in relation to your Personal Information, whether provided in electronic or paper based form, to ensure that it is protected from misuse, interference and unauthorised access, modification or disclosure.
- (b) As a superannuation fund, LGS is required to maintain a copy of your records for a number of years, but when this information is no longer required, and LGS is no longer required by law to maintain it, we ensure that it is destroyed or de-identified as is appropriate.

8. Marketing

- (a) We may use your Personal Information to provide you with information regarding products and services which we believe may be of interest to you. In order to do this, we may provide your Personal Information to third party organisations for specific marketing purposes.

- (b) If you do not wish to receive any marketing information from us, or prefer that we do not disclose your Personal Information to third parties for marketing purposes, you may opt out at any time by:
- (i) electing to opt-out of marketing information through the member online; or
 - (ii) contacting Member Services on 1300 LGSUPER (1 300 547 873).

9. Enquiries and complaints

- (a) If you have any enquiries or complaints in relation to this Policy, or the handling of your Personal Information by LGS, please contact our Privacy Officer at:

Privacy Officer

Local Government Super
PO Box N835, Grosvenor Place, Sydney 1220

- (b) Our Privacy Officer will respond to your complaint within a reasonable time of receipt. If you are not satisfied with the response, you may lodge a complaint with AFCA which is an external dispute resolution body and can be contacted on:

AFCA

Telephone: 1800 931 678
Email: info@afca.org.au
Post: GPO Box 3, Melbourne VIC 3001
Website: www.afca.org.au

- (c) You may also lodge a complaint with the Office of the Australian Information Commissioner which can be contacted on:

Office of the Australian Information Commissioner

Telephone: 1300 363 992
Email: enquiries@oaic.gov.au
Post: GPO Box 5218, Sydney NSW 2001
Website: www.oaic.gov.au

10. Policy Updates

LGS may review and update this Policy from time to time. A copy of the most current policy can be found on our website at www.lgsuper.com.au/about/privacy.asp.

11. Policy information

Internal references

LGS Privacy Procedures

External references

Privacy Act 1988 (Cth)
Australian Privacy Principles

Effective date

2 April 2019

Review

April 2021

Authorisation

This policy is authorised as follows:

Authorised by	Board of Directors
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