

Privacy Policy Superannuation and Investments

30 June 2023

Contents

Introduction to superannuation and investments privacy policy	1
Collecting your personal information	3
Using your personal information	6
Disclosing your personal information overseas	7
Your consent is important	8
Marketing and privacy	9
Managing your personal information	10
How do I access my personal information?	11
How do I request correction of my information?	12
Resolving your concerns	13

Introduction to superannuation and investments privacy policy

Protecting your privacy

Protecting your privacy and the confidentiality of your personal information is fundamental to the way we do business.

We handle personal information, including sensitive information, confidentially and in accordance with the *Privacy Act 1988* (Cth) (Privacy Act). We value the ongoing trust you have in us to protect your privacy.

Personal information is information or an opinion about you.

In this Privacy Policy, references to 'we', 'us' and 'our' are references to OnePath Custodians Pty Limited, OnePath Funds Management Limited, Oasis Fund Management Limited and Oasis Asset Management Limited.

We are subject to strict standards in relation to the handling of personal information.

We are owned by Insignia Financial Ltd (ABN 49 100 103 722) (Insignia Financial) and are members of the Insignia Financial group. In order to assist with the management and administration of your products and services, your personal information will be shared with Insignia Financial group who will handle your personal information in accordance with its privacy policy, available at insigniafinancial.com.au/privacy-policy

This Privacy Policy explains how we will manage and protect your personal information, including information that we collect during the course of offering and providing a product or service to you and the information we hold after your product or service is terminated (where we are required to hold this information or it is necessary for our functions). This Privacy Policy also applies to information that we collect from third parties.

This Privacy Policy contains information about how you can access the personal information we hold about you, how you can ask us to correct your personal information and how you can make a complaint if you have concerns about how we have managed your personal information.

How to contact us

If you have any questions or would like more information about this Privacy Policy you may call us on 133 665 or email us at client@onepathsuperinvest.com.au

Our privacy framework

We are bound by the Privacy Act and the Australian Privacy Principles (APPs) set out in that Act. The APPs regulate the way that certain entities, including us, handle personal information.

The Privacy Act does not apply to the handling of information that does not relate to individuals – for instance information about corporations.

European Union General Data Protection Regulation

If you reside in a country that is a member of the European Economic Area (the EU and Norway, Lichtenstein and Iceland), in addition to the protection you receive under the Privacy Act, you are entitled to other protections provided by the European Union General Data Protection Regulation (GDPR), including, in certain circumstances, the right to:

- have your personal information erased;
- access your personal information in an electronic and portable format; and
- restrict or object to the processing of your personal information.

Collecting your personal information

We collect your personal information so that we can provide you with your products and services and perform our various functions and activities. We also collect your personal information if the law requires us to collect it.

If we do not collect your personal information, we may not be able to deal with you, or provide you with a product or service.

We collect most personal information directly from you, and in some circumstances, other people with whom you are a joint product holder. For example, you provide us with your information when you, purchase a product or service, fill in an application form, deal with us over the telephone, send us a letter or use our websites.

If you apply for one of our products or services, we may collect and hold information from you such as your name, address, telephone number, e-mail address, tax file number (TFN), date of birth, annual income and other financial and employment details.

Collecting sensitive information

Some information that we collect from you may also be considered sensitive information.

Sensitive information includes personal information about a person's racial or ethnic origin, political opinion, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record. Sensitive information also includes genetic information, health information and biometric information that is used for identification or biometric templates.

We may collect health information from you and your medical practitioner with your consent to assess your application for life insurance, to administer your insurance cover through your superannuation account and assess any claim made under that insurance cover. We may also collect information about you if your family members apply for OneCare Super.

We may also collect sensitive information through customer surveys or questionnaires so that it may obtain your feedback and provide further information to you about our products or services. More information about our marketing practices can be found below.

Collecting information from third parties

We may also collect information about you that is publicly available, including information from telephone directories, the electoral roll or other websites.

There may be occasions when we collect personal information about you from a third party. For example, we may collect personal information from:

- joint issuers of our products and other organisations including those in an alliance with us, to co-issue, distribute, manage and administer our products and services, carry out business functions and undertake analytics activities;
- organisations that we have an arrangement with to jointly offer products and/or has an alliance with to share information for marketing purposes to provide you with products or services and/or to promote a product or service;
- our related entities so we can better manage your relationship with these companies;
- marketing companies if we acquire contact information to tell people about our products and services that may interest them (unless you have opted-out of receiving such communications from us); and
- financial advisers and other parties who may have introduced you to us or who are acting on your behalf.

We may also collect information about how you use our websites and other websites to help us better tailor our services to you. For example, we may do this when you click on a link from one of our websites or visit a website which displays one of our advertisements. Usually, the information we collect in this way is general information only derived from cookies – such as the number of visitors to a site or statistics about how a site is browsed – and does not identify you.

If we do identify you with this information (for example, if you have been logged onto one of our online services), any use or disclosure of that information will be in accordance with this Privacy Policy.

Collecting information required or authorised by law

We may collect information from you because we are required or authorised by an Australian law or court or tribunal order to collect that information. We will tell you if collection is required or authorised by law and provide you with details of the law, court or tribunal order.

For example, OnePath Custodians Pty Limited and Oasis Fund Management Limited are authorised by the tax and superannuation laws to request that you provide your TFN. If OnePath Custodians Pty Limited and Oasis Fund Management Limited collect your TFN, we will handle your TFN in accordance with the Privacy Act and the TFN Rule issued under the Privacy Act.

We may also be required to ask about your tax residency status under taxation information sharing agreements the Australian Government has in place with other countries. For example, a tax treaty between Australia and the United States formed under US law (*Foreign Account Tax Compliance Act*) requires us to ask account holders of some types of products whether they are US citizens or US tax residents when they open their product. If you are a tax resident of another country, the relevant treaty or law may require us to collect your relevant foreign tax identification number.

Using your personal information

We may use and disclose personal information we collect about you for several purposes including:

- to consider your request for a product or service;
- to enable us to provide you with a product or service;
- to tell you about other products and services that may be of interest to you;
- to assist in arrangements with other organisations (such as loyalty partners and alliance partners) in relation to the promotion, marketing or provision of a product or service;
- to manage products and perform other administrative and operational tasks (including risk management, systems development and testing, data analytics, staff training and market or customer satisfaction research), including to assist other organisations (such as alliance partners) for these purposes;
- to assist our insurers and financial advisers provide their services in relation to your product;
- to consider any concerns or complaints you raise against us and/or to manage any legal action between you and us;
- to prevent or investigate any actual or suspected fraud, unlawful activity or misconduct;
- to identify you or establish your tax status under any Australian or foreign legislation, regulation or treaty pursuant to an agreement with any tax authority; and
- as required by relevant laws, regulations and codes of practice.

Disclosing your personal information overseas

We may need to disclose your information to organisations located overseas.

The most common reason for us disclosing information overseas is because we use service providers to perform a range of functions on our behalf including technology, operational and customer service functions, and some of these service providers are located overseas. We only disclose your information to these organisations when it is necessary for the services they provide to us in connection with managing or administering your products or services.

We and our service providers may disclose your personal information to entities located in the following countries:

- The Philippines
- China
- India
- New Zealand
- the United Kingdom
- the European Union
- the United States
- Malaysia
- Japan
- Hong Kong
- Bulgaria
- South Africa.

We may also use other offshore service providers to help provide you with our products and services or identify ways to improve our service to you.

If you have a conversation with our Contact Centre staff, we may send you an automated follow up request for your feedback on your experience(s). We use external service providers based in the USA, Canada and the UK to help us send you the automated request and to analyse responses. We may therefore need to send your information to these locations.

When we disclose your information overseas, we are required to take measures to ensure your information is treated in accordance with the standards that apply in Australia except in rare cases (for example, where we obtain your consent not to take these measures).

The above is not a complete list of the countries to which your information may be disclosed when using one of our products or services. In some circumstances, the nature of the product or service you request may require us to disclose your information overseas and the countries to which we may disclose your information will depend on the particular circumstances.

Your consent is important

We may require your consent to use and/or disclose your information in particular ways.

For instance, we need your consent if we need to use your information for a purpose that is not related to the purpose for which we collected your information in the first place.

Depending on the circumstances, this consent may be express (for example, you expressly agree to the specific use of your information by ticking a box) or implied by some action you take or do not take (for example, your agreement is implied by the fact that you have agreed to your product terms and conditions which contains information about the use or disclosure).

Marketing and privacy

As part of our service to you, we may use personal information (including, if we have your consent to do so, your health and other sensitive information) we have collected about you to identify a product or service that may benefit you. We may contact you from time to time to let you know about new or existing products or services. We may also disclose your personal information to our related entities or other third parties with whom we are in an alliance for marketing purposes.

We, our related entities and alliance partners, may send you information about new or existing products and services from time to time.

To opt out of receiving this information from us, please call 133 665, email client@onepathsuperinvest.com.au, or alternatively, contact the party that sent you the communication directly by following the opt-out or unsubscribe process in that communication.

Managing your personal information

We protect your information

We protect your personal information from misuse and loss. We also protect it from unauthorised access, modification and disclosure by ensuring that your personal information can only be accessed by people properly authorised to have access.

We may store your personal information in hardcopy documents or electronically. We maintain physical security, such as locks and security systems, over our paper and electronic data stores and premises. We also maintain computer and network security. For example, we use firewalls (security measures for the internet) and other security measures such as identification codes and passwords to control access to computer systems. We continually maintain and monitor our online security systems to ensure that our online services are secure and that your personal information is protected when you use these services.

Protecting your privacy

You can help us to protect your privacy by observing our security requirements and contacting us immediately if your contact details change.

We require you to keep your passwords and access codes confidential and secure at all times. This means that you should not disclose your passwords or access codes to any other person. You should contact us immediately if you believe that your passwords or access codes may have been disclosed to another person or if you would like to change your password.

How do I access my personal information?

Subject to some exceptions, you can find out what personal information we hold about you.

You should contact us if you wish to find out about the personal information one of our companies holds about you. We will need to verify your identity before giving you access.

We will normally be able to deal with your request immediately. If the request is complex, we will ask you to complete a personal information request form. We can usually deal with such a request within 14 to 30 days.

Depending on the complexity of your request, we may charge a fee for processing the request. Please refer to our fees and charges booklets for our standard fees and charges.

We will usually provide access to your information at the office closest to you in order to protect the confidentiality and security of your information. However, you may elect to receive your information by another method where practicable, including by registered mail, courier or email.

In certain circumstances, we may not be able to tell you what personal information is held about you. In these circumstances, we will write to you to explain why we cannot provide you with the information and attempt to find alternative means to enable you to access your information.

How do I request correction of my information?

If you believe that the personal information we hold is inaccurate, incomplete or out of date, you should contact us.

We will promptly update any personal information that is inaccurate, incomplete or out of date. If we do not agree that your information is inaccurate, incomplete or out of date, we will write to you and tell you the reason(s) why we do not agree with you. We will also tell you what you can do if you are not satisfied with our response.

Resolving your concerns

You are entitled to complain if you believe that your privacy has been compromised or that we have breached the Privacy Act, or an applicable code.

If you have a privacy complaint, you can contact the person or our company department that you have been dealing with. Alternatively, you can lodge a complaint online at onepathsuperinvest.com.au or contact our Customer Response Centre. The Customer Response Centre's contact details are:

Phone: 133 665 (between 8:30am to 6:30pm Mon-Fri AEST, excluding public holidays)

Mail: GPO Box 5306, Sydney NSW 2001

E-mail: client@onepathsuperinvest.com.au

If you have a complaint about a breach of the GDPR, you may contact the local regulator in your European Economic Area.

Managing your complaint

If you make a complaint, we will respond within 48 hours to let you know who is responsible for managing your complaint. We will try to resolve your complaint within 15 working days. When this is not possible, we will contact you within that time to let you know how long we will take to resolve your complaint.

We will investigate your complaint. We will make a decision about your complaint and write to you to explain our decision.

If your complaint is not satisfactorily resolved, you may access an external dispute resolution service or apply to the Office of the Australian Information Commissioner (OAIC) to have the complaint heard and determined. When we write to you about our decision, we will explain how you may access an external dispute resolution scheme or make a complaint to the OAIC.