



right by your side

Privacy Policy

Brighter Super Trustee

ABN 94 085 088 484

RSE Licence No. L0000178

as trustee for

Brighter Super

ABN 23 053 121 564

RSE Registration No. R1000160

Introduction

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

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

Brighter Super is subject to the Australian Privacy Principles (APPs) which are privacy standards set out in the *Privacy Act 1988 (Cth)* (Privacy 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 and 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).

What laws authorise or require us to collect personal information?

We are authorised or required by law to collect information under the following laws:

- *Income Tax Assessment Act 1936 (Cth) and the Income Tax Assessment Act 1997 (Cth)*
- *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)*
- *Insurance Contracts Act 1984 (Cth)*
- *Corporations Act 2001 (Cth)*
- *Family Law Act 1975 (Cth)*
- *Superannuation Industry (Supervision) Act 1993 (Cth)*
- *Superannuation (Unclaimed Money and Lost Members) Act 1999 (Cth).*

Privacy Policy objectives

The primary objectives of Brighter Super's Privacy Policy are to:

- protect the privacy of Brighter Super members, staff and other persons with whom we have dealings
- demonstrate that Brighter Super will only collect personal information that is required to administer our products and services
- establish policies and procedures to ensure personal information is managed in an open and transparent manner
- maintain the confidentiality of personal information through strong internal procedures and robust system security
- comply with the requirements of the Privacy Act including the APPs.

Responsibility

Brighter Super has ultimate responsibility for ensuring it complies with regulatory requirements including the Privacy Act. Brighter Super has delegated the responsibility for monitoring the compliance of Brighter Super's operations to the Risk and Compliance Committee (RCC). Brighter Super has established and will maintain an appropriate and effective compliance framework within the organisation.

Brighter Super Privacy Policy

Regulatory requirements

APP 1 – *open and transparent management of personal information* – 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.

APP 1 also requires an organisation to take reasonable steps to make its policy available free of charge and in such form as is appropriate, for example, the policy can usually be made available on the organisation's website. A person or body may request a copy of the policy in a particular form and the organisation must take reasonable steps to provide a copy in that form.

This Policy is available for download from Brighter Super's website. You can also request a copy free of charge by calling Brighter Super on 1800 444 396. A copy will be provided by post or email. If you have questions about this Policy, you can contact Brighter Super on 1800 444 396 or by email to privacy@brightersuper.com.au.

What is 'personal information'?

Personal information has the meaning given to it under the Privacy 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 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.

Brighter Super 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 Privacy Act.

Brighter Super will collect health information about you to provide death and disability insurance.

Collection of your personal information

We collect your personal information when establishing and administering Brighter Super's products and services, upon commencement and throughout your employment with Brighter Super or throughout our other interactions with you. The kinds of information which may be collected and held includes:

- name
- address
- date of birth
- contact details including email address
- gender
- tax file number
- salary
- employment detail
- marital status, family details or circumstances
- health and medical information relevant to Brighter Super's insurance products
- financial information including 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 or other applications or web-based services (including our website's tools and calculators). For more information on how Brighter Super collects and uses this information, refer to the "Is your information secure on the internet" section below.

Most personal information is collected from you or 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, a service provider, 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.

Throughout your membership of Brighter Super or the life of your product or service, we may collect and hold additional personal information about you, including in the following circumstances:

- when you make a claim for a financial hardship benefit or seek financial advice
- when we record a query or complaint you have made
- if you make an insurance claim, collecting additional personal information to assess the claim.

If you are a nominated beneficiary of a Brighter Super member or under an insurance policy we provide, details of your financial position and financial needs, and other information may be required to assist Brighter Super to decide to whom a death benefit should be distributed.

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 Brighter Super products and services on your behalf, to keep you up to date with important changes that could affect your superannuation or your insurance and to provide you with information (including marketing information) about Brighter Super's products and services. We handle your information with the highest level of care and in line with the Privacy 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 Brighter Super or their employment with us.

Where it is possible, for example when providing general information about the fund, Brighter Super 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.

Brighter Super prides itself on the personal service we provide to our members. Personalising our service normally requires us to identify the member or other person we are interacting with.

How we use and disclose your personal information

Brighter Super collects, holds, 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 ('primary purpose') by us to:

- start and maintain a superannuation account or 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 including to provide advice about and services in relation to your superannuation and insurance
- assess and manage an employment application and, if you are offered employment with Brighter Super, your ongoing employment
- provide information (including marketing information) to you about Brighter Super's products and services, including via the disclosure of personal information to third party service providers.

Your personal information may also be ('secondary purpose'):

- disclosed by us to our insurers so we can provide you with death and disability

insurance

- used by us or a trusted service provider 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 service providers such as mailing houses or market research organisations to 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 service providers to complete a business activity for us
- used or disclosed for another purpose for Brighter Super's functions or activities.

If you do not want us to use your personal information for marketing, event 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 may disclose your personal information to your financial advisor or to your third-party authority or attorney only after you have provided us with your explicit authorisation. Such authorisation is required in writing, and you will be required to provide proof of identity before the authorisation is accepted.

Brighter Super may be required to collect and use certain government related identifiers such as your tax file number or Centrelink customer reference number to provide certain services to you. Brighter Super 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 Privacy 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 and correct your personal information held by Brighter Super?

You have a right to request access to your personal information and to request its correction.

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

If you do not have internet access, have not yet registered for online access, are not a member, or are not able to change a particular piece of information online, you can check and change your details by contacting Brighter Super's Privacy Officer on 1800 444 396, or privace@brightersuper.com.au or at GPO Box 264, Brisbane QLD 4001.

Please note we will have to conduct an identity check to establish your identity prior to making 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 Brighter Super's Complaints Officer (using the contact details at the end of this Policy). You can also request us to attach a statement with your personal information record stating that you believe your personal information 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 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. Brighter Super's Complaints Officer can advise if any of these situations apply to your circumstances.

Can your personal information be disclosed overseas?

Brighter Super outsources some of its primary business functions to service providers located outside Australia.

We also engage third parties to provide services to us that support our primary functions of providing products and services to you. These service providers may be located outside Australia and may not be subject to Australian Privacy laws or standards.

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, United Kingdom and in the European Union.

Further, our insurers for death and disability benefits may disclose information they receive from Brighter Super, or directly from you to recipients (including 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 Privacy Act and the APPs.

If it is necessary for Brighter Super or our service providers to disclose your personal information to a third party located outside of Australia, we will seek to do so in a manner that is consistent with Privacy Act and the APPs.

Can your personal information be used for direct marketing?

Brighter Super may use your personal information for sending you or displaying to you marketing communications and information about our products and services. The communications may be sent in various forms including email, mail, SMS and social media. Marketing communications may also be displayed to you on websites or on social media. If you have a preference for the type of communication used, we will endeavour to use that type whenever it is possible and/or practical to do so.

Personal information collected from you may be used to provide updates and promotional information about Brighter Super and its products and services, such as upcoming member events.

If you want to change how we communicate with you or would like to unsubscribe from receiving marketing communications you can review your preferences on [member online](#) (available to Brighter Super members only), or you can contact Brighter Super by email (privacy@brightersuper.com.au) or by calling 1800 444 396. To obtain information about how to unsubscribe from receiving targeted advertisements, please call or email us using the details set out above.

Brighter Super will not share or provide your personal information to other organisations other than as provided in this Policy or as permitted by law.

Is your personal information secure?

Brighter Super is committed to protecting your personal information that we hold and we use and maintain appropriate systems and safeguards to protect it from misuse, interference, loss, unauthorised access, modification or disclosure.

We have measures in place to protect your personal information such as information technology systems, physical and electronic security measures, and internal administrative and personnel processes. These include:

- control of access to information systems through identity and access management
- obligations on employees to comply with internal information security policies and to keep information secure
- regular monitoring and review by us of our compliance with internal policies.

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?

Brighter Super takes care to protect the information you give to us on or that we collect from 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.

Brighter Super may use behavioural data (including 'cookies' and 'pixel tags') to collect and store information (including personal 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. We may also use the information collected to provide information (including marketing information) about Brighter Super's products and services to you. Behavioural data is used on our website to remember your preferences, improve functionality and enhance your browsing experience. They also help us understand how visitors engage with our services, allowing us to make improvements that better meet your needs.

The Brighter Super website may contain links to other websites operated by other parties. Brighter Super makes no representations or warranties in relation to the policies and procedures adopted by these parties and we are not responsible 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 Brighter Super, 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 that we hold, 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 Brighter Super
- Brighter Super employees accessing or disclosing personal information outside the requirements or authorisation of their employment
- paper records stolen from insecure recycling or garbage bins
- Brighter Super providing your personal information to the wrong person, for example by sending details to the wrong address
- 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
- provide you with recommended steps you can take in response to the breach.

We may also be required to inform the Office of the Australian Information Commissioner in certain circumstances.

Enquiries and complaints

Brighter Super is passionate about giving you the personal service you want. If you have any questions, please call our friendly Member Services Team on 1800 444 396 or email – privacy@brightersuper.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 or believe we have breached the APPs, please contact our Complaints Officer immediately by:

Phone: 1800 844 396
Email: complaints@brightersuper.com.au
Post: Complaints Officer
Brighter Super
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

Brighter Super reviews this Privacy Policy at least annually and any changes must be approved by the RCC. Members and others are encouraged to check the Brighter Super website for any changes to this Policy.