

Vision Super Pty Ltd

ABN 50 082 924 561

Using and disclosing personal information

BACKGROUND

This policy supports the main [Privacy policy](#).

STATEMENT OF POLICY

In the course of conducting its normal business activities, Vision Super collects, records, maintains, uses and discloses personal information in relation to its members, beneficiaries, and some employees of relevant authorities and participating employers (“individuals”).

This information will be kept confidential at all times and will only be used for the purposes for which it was collected, namely:

- Managing and paying superannuation benefits;
- Informing and educating individuals;
- Addressing complaints made by individuals;
- Providing, assessing and paying death and disability benefits; and
- Providing associated services, such as general and personal financial product advice in relation to superannuation and insurance benefits and in relation to retirement benefits generally.

It is important to note that in carrying out the above purposes, Vision Super may be required to disclose an individual’s information to an overseas entity or body. In doing so, Vision Super is obliged to make all reasonable efforts in ensuring that adequate privacy measures are in place (or put in place) with respect to the handling of the individuals’ information.

Vision Super will not use or disclose personal or sensitive information for any purpose other than that for which it was collected, except where:

- it directly relates to the purpose for which it was collected;
- the individual has given his or her consent;

- there is a legal requirement;
- disclosure is required to prevent, detect, investigate or prosecute a criminal offence or breaches of a law imposing a penalty or sanction, or to protect public revenue;
- disclosure is required for the preparation for, or conduct of, legal proceedings before a court or tribunal, or the implementation of orders of a court or tribunal;
- the purpose for which the disclosure is made is related to the purpose for which the information was obtained and directly related where the information is sensitive and the individual would reasonably expect Vision Super to use or disclose the information in this way;
- Vision Super reasonably believes that the use/disclosure is necessary to lessen or prevent a serious and imminent threat to an individual's life, health or safety or public health or safety; or
- Vision Super is required by the *Family Law Act 1975* (Cth) to disclose personal information to an individual's spouse/partner or former spouse/partner,

If personal information is disclosed in any of the scenarios described above, that disclosure will be noted on the individual's record, and (if permitted by an Australian law or court/tribunal order) the individual's information will be de-identified before Vision Super discloses the information to the relevant party in accordance with the above points.

External Service Providers/Contractors

All domestic external service providers/contractors engaged by Vision Super, such as facilities management, actuaries, underwriting specialists, medical consultants, printing, mailing and other professional advisers, will be required to comply with the Privacy Act 1988 and Vision Super's privacy policies.

However, when Vision Super engages external services providers/contractors that are based overseas, and the external service provider/contractor does not have an Australian base for operations, Vision Super is obliged to make all reasonable efforts in ensuring that adequate privacy measures are in place (or put in place) in respect of the handling of the individuals' information.

Marketing

Vision Super does not consider any activity associated with managing the fund or informing and educating individuals, to be marketing.

However, where Vision Super does involve itself in marketing related activities (including direct marketing), Vision Super will only use the personal information of individuals for the purposes of direct marketing in the following circumstances:

- Where Vision Super has collected the personal information from:
 - the individual, and the individual would reasonably expect that Vision Super would use or disclose the individual information for that purpose; or
 - the individual, and the individual would not reasonably expect that Vision Super would use or disclose the individual information for that purpose, and the individual has consented to Vision Super using their personal information for direct marketing purposes; or

- the individual, and the individual would not reasonably expect that Vision Super would use or disclose the individual information for that purpose, and it was impracticable for Vision Super to obtain the individual's consent to Vision Super using their personal information for direct marketing purposes; or
- someone other than the individual, and the individual has consented to Vision Super using their personal information for direct marketing purposes; or
- someone other than the individual, and it was impracticable for Vision Super to obtain the individual's consent to Vision Super using their personal information for direct marketing purposes; and
- Where the individual has been provided with a simple opportunity to opt-out of receiving direct marketing material (free of charge) from Vision Super, and the individual has not taken such an opportunity to opt-out of receiving such material or has not made a similar request.

Vision Super will not use or disclose the sensitive information of individuals for direct marketing activities without an individual's prior consent.

If Vision Super uses or discloses the personal information of individuals for the purposes of the direct marketing of Vision Super or another organisation (such as Members Equity Bank), the individual may request not to receive direct marketing communications from Vision Super or the other organisation free of charge. The individual may also wish to ask Vision Super what the source of the individual's personal information is, and Vision Super must provide such information and notify the individual of the source within a reasonable period after such a request, unless it is impractical or unreasonable to do so.

CEO

7 March 2014