

DOCUMENT TITLE:	Aracon Superannuation Pty Ltd (Aracon) Privacy Policy
DOCUMENT VERSION:	V3.0
VERSION DATE:	29 August 2018
DOCUMENT STATUS:	Final
DISTRIBUTION LIST:	Aracon Trustee Board, Aracon Audit, Risk, Remuneration and Compliance Committee (ARRCC)

Version Control

VERSION NUMBER	DATE MODIFIED	MODIFIED BY	REASON FOR MODIFICATION
1.0	12 March 2014	N/A - version control not previously captured	N/A - version control not previously captured
2.0	25 August 2018	Aracon Risk and Compliance Manager	Creation of stand-alone Aracon policy
3.0	29 August 2018	Aracon Trustee Board	Review and approval

Fund: The ARA Retirement Fund
 ABN 40 586 548 205
 RSE Registration Number R1001020

Trustee: Aracon Superannuation Pty Ltd
 ABN 13 133 547 396
 RSE Licence Number L0003384

Date: Adopted on 29 August 2018, with effect from 29 August 2018

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Introduction

Aracon Superannuation Pty Ltd ABN 13 133 547 396 ('Aracon') as trustee (RSE Licence number L0003384) of The ARA Retirement Fund ('the Fund') we are committed to ensuring the confidentiality and security of your personal information. We are bound by the Privacy Act 1988 and the Australian Privacy Principles ('APPs') regulated by the Office of the Australian Information Commissioner (OAIC) to guide us in our responsible handling of personal information.

The purpose of this document is to outline the Privacy Policy of Aracon and explain how it will affect our clients. The information in this document has been prepared to outline to our clients how personal information will be used and protected.

What is Personal information and why do we collect it?

The Privacy Act and APPs apply to the collection, use and disclosure of an individual's personal information by private sector organizations.

Under the Privacy Act, personal information is broadly defined. However in simple terms it means any information related to an individual which is held in a record by an organization such as Aracon.

Aracon may obtain personal information in order to provide you with our services or manage our relationship with you.

If you acquire a service from Aracon, we may ask you to provide certain details including for example, your full name and contact information, your date of birth, your Tax File Number (TFN) and details concerning your financial status. This information may be obtained from you verbally or through application forms for our products and financial questionnaires. In addition we will use that personal information to provide you with further information about our products and services unless you advise that you do not wish to be provided with that information.

Generally we will not need to collect personal information that is classified as sensitive information (i.e. health information, and information about personal attributes such as, ethnic or racial origin, membership of organizations such as trade unions or religious or political affiliations). However, in circumstances where you are applying for certain life and life risk insurances, such as life insurance, Income protection or trauma insurance, we will need to collect health and lifestyle information from you in order to satisfy the insurance underwriting process.

Unless an exception applies, we will obtain your consent before we collect any sensitive information.

There may be instances where we need to collect personal information about individuals who are not clients of Aracon (e.g. business contact details of a company representative with whom we deal).

How do we collect and hold personal information?

When you become a client of Aracon, you will complete application forms to join the Fund. In these forms there are personal details that we must collect from you in order to meet our legal obligations in providing the financial services to you. We may also obtain this information verbally from you during the course of a consultation with one of service providers.

Prior to us providing you with a service that is designated under the Anti Money Laundering and Counter Terrorism Financing Act 2006, we will also request you provide us with a form of acceptable photographic identification. As with other personal information we collect in order to provide our service, this too will be treated as personal information and stored in the same manner.

Using your Personal Information

Aracon's policy is to use personal information for the main business purpose for which it was collected.

Your personal information collected by Aracon may be used in order to:

- Provide you with our services or with other information that you have requested be provided to you;
- Notify you about Aracon's services or promotions from time to time; or
- Manage our relationship with you.

Disclosure of personal information to other parties

Whilst our policy is to maintain the confidentiality of all personal information held by us, it may be necessary to disclose your personal information in the following circumstances:

- Where we are by law required to disclose information to law enforcement agencies, government agencies, the courts or external advisers.
- In cases where personal information is disclosed to third parties in relation to the supply of any of our services or products. If it is necessary to disclose your personal information in these circumstances, you will be advised by Aracon at the time we supply those products and services and if necessary we will first of all obtain your consent.
- To third parties in cases where Aracon contracts out specialised functions, e.g. organisations providing administration services, mailing services, maintaining our technology systems, printing our documents and correspondence etc.

We will endeavour to ensure that any organisation to whom we disclose your personal information has appropriate privacy protocols in place.

Aracon does not sell or rent personal information to, or trade personal information with, third parties.

Aracon will only ever disclose your personal information with your consent. However for the purposes of offering our retirement service, we must disclose your personal information to the external administrator of the Fund. They are not permitted to use this information for any other purpose than is permitted by the applicable superannuation and taxation laws.

Consequences if we do not collect the personal information

You are entitled not to provide your personal information to us, however in most cases this will preclude Aracon from providing you with financial advice or services as we are obliged by law not to provide these services without identifying who you are or knowing your particular circumstances.

Collection of Tax File Numbers (TFNS)

Under the TFN Guidelines an individual's TFN can only be used for the purposes of facilitating the effective administration of taxation law, certain aspects of personal assistance and superannuation law and **not** to assist in the identification of individuals for other purposes.

An individual is not legally obliged to quote their Tax File Number, however there may be financial consequences for an individual who chooses not to quote their TFN. If we request that you provide your TFN we will do it only in accordance with the authority of relevant legislation such as the Superannuation Industry (*Supervision*) Act 1993 (SIS Act) and for the purposes authorized by the relevant act such as the SIS Act.

Where we request that you provide your TFN, we are obliged to inform you either verbally or in writing;

Aracon Privacy Policy

- Of the purpose for which the TFN is requested or collected
- The name of the law that authorise us to collect your TFN
- That declining to quote your TFN is not an offence,
- And the consequences of declining to quote your TFN

There are guidelines which govern the collection of TFN's. The TFN Guidelines are legally binding. A breach of the TFN Guidelines is an interference with privacy under the Privacy Act. Individuals who consider that their TFN information has been mishandled may make a complaint to the Australian Information Commissioner.

Capacity

Aracon Superannuation Pty Ltd, as an RSE Licensee is an authorised recipient of TFN information.

Storage of your TFN details

We are required to take all reasonable steps to protect Tax File Number information from misuse and from unauthorized access, modification or disclosure.

In storing your TFN information we will ensure that the records containing any TFN information is restricted to those individuals who need to handle that information for superannuation law or investment law purposes.

Where TFN information is no longer required by law to be retained or no longer necessary for a purpose under taxation law, personal assistance law or superannuation law, we will take steps to either;

- Securely destroy or
- Permanently de-identify the TFN information

Overseas Disclosure

Aracon does not use the services of overseas providers. Therefore we will not disclose your personal information overseas.

Protection of your personal Information

Aracon is committed to protecting your personal information from misuse and loss and from unauthorized access, modification or disclosure.

Where we have collected personal information for the purpose of providing you with financial advice (the primary purpose), We will not use or disclose this information to another person unless you have consented to the use or disclosure of the information.

We will limit access to those staff who provide services or products to you. Aracon relies on the correctness of the information that you supply to us. Please assist Aracon by contacting us if any of your personal information is incorrect, has altered or requires updating.

Aracon has installed software on its photocopier that erases all information on the hard drive after each copy, thereby protecting your personal information in the event we sell the copier.

How to access your personal information

Under the Privacy Act you have the right to seek access to the information that we hold about you. You also have the right to request us to correct information about you which is inaccurate, incomplete or out of date.

Aracon will endeavour to provide you with the access that you require as soon as possible but in any event normally within 21 days of receiving your request. This information will normally be provided to you in hard copy by printing off or photocopying the information from our current records.

There are circumstances where we have the right to deny access to particular information as follows:

- Where this may result in having to disclose processes that are commercially sensitive; or
- Where legal proceedings have commenced.

If it is necessary to deny you access to any of your information, we will explain to you the reason why it has been denied.

Contacting Aracon about Privacy

If you have any questions about Aracon's privacy policy please contact:

The Privacy Officer
Aracon Superannuation Pty Ltd
Phone: (03) 9853 1688
Fax: (03) 9853 1622

If you wish to make a written enquiry please write to us at:

The Privacy Officer
Aracon Superannuation Pty Ltd
Level 1, 17 Cotham Road, Kew, VIC 3101

Complaints

Aracon is committed to resolving your privacy complaint as quickly as possible and has procedures in place to help resolve any complaints efficiently. Our aim is to assist you by reaching a satisfactory solution in the shortest possible time frame.

If you have a complaint or concern about privacy at Aracon, please contact the Privacy Officer in writing. You will receive a response to your complaint within 30 days. Once you have received our response and you are not satisfied with that response, you may make your complaint to the Australian Information Commissioner

If you have a complaint in relation to the alleged mishandling of your Tax File Number, please contact The Australian Information Commissioner. You may also report lost or stolen TFNs or unauthorised access to your TFN to the Australian Taxation Office (ATO).

Office of the Australian Information Commissioner (OAIC)
GPO Box 5218
SYDNEY NSW 2001

Australian Taxation Office
GPO Box 9990
Capital city of your
State/Territory

Or

Or www.ato.gov.au

GPO Box 2999
CANBERRA ACT 2601

Phone: 1300 363 992
Email: enquiries@oaic.gov.au

Change in Policy

Aracon may make changes to this Privacy Policy from time to time in order to improve it or update it as Aracon deems applicable or as the law may require.