

# Privacy Policy

<b>Trustee Name</b>	Manildra Flour Mills Retirement Fund Pty Ltd (ABN: 74 065 680 195, RSE: L0003155), trustee of the Manildra Flour Mills Retirement Fund (ABN: 32 448 411 930, RSE R1067415)
<b>Policy Name</b>	Privacy Policy
<b>Date Prepared</b>	Version approved by the Trustee – 26 May 2020
<b>Special Status</b>	Commercial-in-Confidence

## Amendment History

The following history and amendments have been made to this document:

<b>Version</b>	<b>Prepared By</b>	<b>Reviewed By</b>	<b>Approved By</b>
Version 1.0	Professional Financial Solutions 24 January 2014	Gilbert Bratby, Fund Secretary 18 February 2014	Trustee Board 18 February 2014
Version 2.0	Professional Financial Solutions 16 January 2015	Gilbert Bratby, Fund Secretary February 2015	Trustee Board 17 February 2015
Version 3.0	Professional Financial Solutions 4 March 2016	Gilbert Bratby, Fund Secretary June 2016 Audit, Risk and Compliance Committee 23 Jun 2016	Trustee Board 23 June 2016
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Version 5.0	Professional Financial Solutions 8 May 2018	Gilbert Bratby, Fund Secretary 10 May 2018 Audit, Risk and Compliance Committee 24 May 2018	Trustee Board 24 May 2018
Version 6.0	PFS Consulting 2 April 2020	Gilbert Bratby, Fund Secretary April 2020 Audit, Risk and Compliance Committee 26 May 2020	Trustee Board 26 May 2020

# Manildra Flour Mills Retirement Fund Pty Ltd as Trustee of the Manildra Flour Mills Retirement Fund

## Privacy Policy

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### Our privacy commitment to you

Manildra Flour Mills Retirement Fund Pty Ltd as Trustee of the Manildra Flour Mills Retirement Fund (together “**Manildra**”) is committed to respecting your rights to privacy and protecting your personal information.

We are bound by the provisions of the Privacy Act 1988 (Cth) which contains thirteen Australian Privacy Principles which regulate how Manildra collects, uses, discloses and keeps secure your personal information.

This Privacy Policy outlines the types of personal information Manildra may need and the reasons for its collection, and explains how the information is collected, stored, used and disclosed. It will help you to understand how Manildra takes all reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

Although Manildra is referred to throughout this document, generally it is the company contracted by us to administer the Manildra Flour Mills Retirement Fund who collects, stores, uses and discloses your personal information on Manildra’s behalf.

In this Privacy Policy, the Trustee, the Fund and the Administrator are together referred to as ‘Manildra’, ‘we’, ‘our’ or ‘us’.

### What is personal information?

Personal information is information or an opinion about an identified individual, or an individual who is reasonably identifiable, whether the information or opinion is true or not, and whether the information or opinion is recorded in a material form or not.

Sensitive information is a sub-set of personal information which includes any information or an opinion about your racial or ethnic origin; your political opinions; your membership of a political association, a professional or trade association or a trade union; your sexual preferences or practices; your religious beliefs or affiliations; your criminal record; and your health or disability status (including genetic and biometric information).

### What types of personal information is collected and why?

#### *Personal information*

The personal information that Manildra collects from you may include your name and address, date of birth, contact details, details about your occupation and employer, and Tax File Number. We may also ask you to provide original or certified documentation to verify or support your personal information (such as your driver’s licence, passport or birth certificate).

Manildra is required to obtain your consent to collect your personal information. We seek consent and collect your personal information directly from you where practicable, such as when you complete a membership application or change of personal details form, or when you send us documents containing personal information. There may also be circumstances where your employer is required to provide your details to Manildra on your behalf, such as to inform us of your Tax File Number, employment status and contributions paid on your behalf.

The personal information that we collect from or about you is reasonably necessary in order for Manildra to perform the following primary functions and activities:

- a. To establish and administer your superannuation and/or pension accounts, including processing contributions from you or on your behalf; investing in accordance with your chosen investment strategy; providing an approved insured benefit; regularly communicating with you about your accounts; and paying benefits to you or your beneficiaries at the appropriate time.
- b. To comply with the customer identification and verification procedures required by the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and corresponding Rules and Regulations.
- c. Where you have chosen to provide your Tax File Number, to locate or identify your superannuation and/or pension accounts; deduct tax from eligible termination payments; report to other regulated superannuation entities (when transferring your benefits to that entity); and report to the ATO in relation to co-contributions, spouse contributions, and unclaimed monies.
- d. To send you relevant information on the products and services to which your membership gives you access.
- e. To consider your provision of goods and services to us.

The personal information that Manildra collects from or about you may also be used for secondary purposes such as assisting Manildra to develop products and services suitable to our membership.

If the Trustee receives personal information we did not request (“unsolicited information”) we will determine whether that unsolicited information is reasonably necessary for our functions or activities. If it is, we will manage the information in accordance with our privacy policy. However, if it is information that we are not authorised to collect then, provided it is lawful and reasonable to do so, we are required to destroy or de-identify that information.

#### *Sensitive information*

There are specific circumstances where Manildra may ask for, or collect on your behalf, sensitive information in order to perform a primary function or activity, including:

- a. In order to provide you with insurance cover, or assess your eligibility to claim a benefit, Manildra may need to collect information about your health and income, including medical reports, work experience and qualifications, and income. We may also need to disclose your health information to a third party for verification purposes such as the assessment of a medical condition.
- b. Your bank account details in order to action a direct debit to your superannuation account and/or make a pension payment into your nominated account.
- c. Information about your dependents, including details of their relationship with you, in order to determine an appropriate distribution of your benefit in the event of your death.

Sensitive information will only be used and disclosed for the purpose for which it was provided, unless you agree otherwise or disclosure is required or authorised by or under an Australian law or court/ tribunal order. We will always seek your express written consent before collecting sensitive information from you or on your behalf.

#### *Information required by law*

Manildra is required by law to ask you to provide certain personal information. Wherever there is a legal requirement for us to seek information about you, we will inform you of the obligation and the consequences of not providing us with the requested information.

### *Tax file numbers*

We are required to ask for your Tax File Number (**TFN**) when you join Manildra otherwise your employer must inform us directly of your TFN. If we are unable to obtain your TFN, we will be unable to accept personal contributions from you; you may be subject to additional tax on your contributions; and you will not qualify for the Government co-contribution if you are otherwise eligible.

Manildra may use your TFN to identify any multiple accounts you may have within the superannuation industry and consolidate these into a single account of your choice. Your TFN may also be used to assist in locating “lost” superannuation monies collected by the ATO.

Manildra’s use of your TFN is strictly controlled. Unauthorised use or disclosure of your TFN is an offence under the Taxation Administration Act 1953 (Cth) and can attract penalties including imprisonment and monetary fines.

### **What happens if you don’t provide the information requested?**

If you choose not to provide the personal information that we ask for, or the information that you provide to us is incomplete or inaccurate, it may mean that Manildra will be prevented from efficiently managing your superannuation and/or pension accounts, offering you the full range of benefits and services that may be available to you, and maintaining contact with you.

### **Anonymity and pseudonymity**

Manildra understands that anonymity and pseudonymity are important elements of privacy and that you may wish to have the option of not identifying yourself, or of using a pseudonym, when dealing with us. Manildra will allow you to remain anonymous or to use a pseudonym when dealing with us unless we are required or authorised by or under an Australian law, court or tribunal order to ask you to identify yourself or it is impracticable for us to deal with you unless you identify yourself.

### **How may your personal information be disclosed and why?**

Generally, Manildra will only disclose your personal information for the purposes for which it was collected.

The organisations and people to whom we may disclose your personal information include:

- Our service providers and any of their sub-contractors, for the purpose of establishing and administering your superannuation and/or pension accounts.
- Your employer, for the purposes of updating or confirming the accuracy of our records and determining your benefits.
- Insurers and insurance underwriters for the purpose of providing you with an insured benefit.
- Insurers and insurance assessors for the purpose of assessing your insurance claim.
- External agencies providing services for the purpose of data matching, cleansing or enrichment.
- Medical practitioners and other relevant professionals when you apply for additional insurance cover or make a claim for a disablement benefit.
- In the event of your death, your legal personal representative, or any other person who might be entitled to receive your death benefit, or any other person contracted to assist us to process that benefit.
- Your financial advisor.
- Your spouse or former spouse or their nominated legal adviser in accordance with Family Law Act 1975 (Cth) requirements.
- Our auditors and other professional advisors.

- Government institutions and regulatory authorities including the ATO, APRA, ASIC, AUSTRAC and the ATO.
- Courts and tribunals, including the Superannuation Complaints Tribunal (**SCT**), the Financial Ombudsman Service (**FOS**) and the Australian Financial Complaints Authority (AFCA).
- Other superannuation entities in relation to a benefit transfer or rollover.

Where your personal information is disclosed to service providers and other organisations, Manildra seeks to ensure that your personal information is handled in accordance with privacy laws and is not used or disclosed for any purpose other than those to which you have consented (unless otherwise required or authorised by or under an Australian law or court/tribunal order). Strict procedures are in place to ensure that our service providers have appropriate systems in place to comply with privacy laws and keep your personal information confidential and secure.

#### *Disclosures relating to insurance*

If you apply for insurance cover, Manildra supplies the personal information that you provide on the application form, including health information, to our insurer so that they can assess your eligibility for new or increased insurance cover.

If you make an insurance claim, you may need to provide Manildra with additional personal and health information in accordance with our claims procedures. To assess your claim, your personal and health information may be disclosed by our insurer to medical practitioners and other experts nominated by the insurer.

If there is any dispute about your entitlement to insured benefits, the insurer or Manildra may disclose your personal and health information to relevant parties involved in the claim or complaints resolution process.

By signing the relevant application for insurance or claims form, you are consenting to the use and disclosure of your personal and health information for these purposes.

#### *Disclosure to third party associations*

Manildra has developed relationships with third party organisations in order to offer you value-added products and services. From time to time Manildra may use your personal information to contact you about these products and services.

Your personal information will never be added to a general marketing database and is never provided to a third party directly. Manildra does not sell, rent or trade your personal information to or with third parties for the purpose of allowing them to send marketing material directly to you.

#### *Disclosure of information to overseas recipients*

Manildra does not currently disclose your personal information to overseas recipients. If it is necessary for us to disclose some of your personal information to an organisation outside Australia we will do so in a manner that is consistent with the privacy laws.

### **Storage and disposal of your personal information**

Manildra takes reasonable steps to protect your personal information from misuse, interference, loss, unauthorised access, modification or disclosure.

We collect and store your personal information in a combination of secure computer storage facilities and paper-based files and records held in secure premises. A system of passwords and different levels of administration

functionality is used to protect your personal information from access by unauthorised personnel. Your TFN is recorded in an encrypted form and destroyed when it is no longer required by law nor administratively necessary to retain.

The personal information you provide to us is only retained for as long as necessary to fulfill the purposes for which the information was collected, unless Manildra is required to retain the information under an Australian law or court/tribunal order. Manildra generally retains health information for many years in order to assist us in the event that a legal dispute arises. In all other circumstances Manildra will take such steps as are reasonable in the circumstances to destroy or de-identify your personal information.

## **Accessing and correcting your personal information**

### *Access*

You have a right to know what personal information Manildra holds about you and to obtain access to it if required. You may request access to your personal information by contacting us using the details provided below. You may need to provide proof of your identity before access is provided. Manildra reserves the right to charge a reasonable fee to cover any costs incurred in providing you with access to your personal information.

There are circumstances where Manildra is not required to provide, or is prevented from providing, you with access to your personal information. Where access to your personal information has been denied or not provided in the manner reasonably requested, Manildra will provide you with a written notice setting out the reasons for our denial of your request (unless having regard to the grounds for the refusal, it would be unreasonable to do so) and the mechanisms available to you to make a complaint about the refusal.

### *Correction*

Manildra aims to ensure that your personal information is up-to-date and complete. You have the right to ask Manildra to take reasonable steps to correct any personal information that you believe is inaccurate, out-of-date, incomplete, irrelevant or misleading, having regard to the purpose for which it is being held. You may need to provide proof of your identity before your information is corrected.

Personal information Manildra has disclosed to another organisation will also be corrected at your request unless it is impracticable or unlawful to do so.

If we do not agree with the corrections that you have supplied, we are not required to alter your information. In such circumstances Manildra will provide you with a written notice setting out the reasons for our denial of your request (unless having regard to the grounds for the refusal, it would be unreasonable to do so) and the mechanisms available to you to make a complaint about the refusal. We will not charge a fee to correct your information.

## **Our website**

From time to time the Manildra's website may contain links to third parties' websites. Those other websites are not subject to our privacy policies and procedures. Once you leave the Manildra website the guidelines of this privacy policy no longer apply. You will need to review those websites directly to view a copy of their privacy policies and to ensure your personal information is protected.

## **Use of your email address**

If you provide Manildra with your email address we may use it to communicate with you. To help us to protect your privacy, always be wary of emails asking you to provide personal information via a hyperlink. Manildra will not use hyperlinks in unsolicited emails.

If you have provided your email address but no longer wish to receive electronic communications from us, you can click the unsubscribe link within the email you received or contact us using the details provided below.

## **Contacting us**

If you have any questions about this Privacy Policy, if you wish to complain about how Manildra has handled your personal information, or if you wish to access or correct the personal information that we hold about you, please contact the Manildra Privacy Officer on:

### **Manildra Privacy Officer**

**Telephone**            **02 9879 9827**

**Email**                **Manildra@manildra.com.au**

**Address**             **PO Box 72, Gladesville NSW 1675**

If we receive a privacy complaint it will be treated seriously and dealt with promptly, in a confidential manner, and in accordance with Manildra's internal complaints handling procedures.

In the event that your complaint is not resolved to your satisfaction, you may refer the complaint to the Office of the Australian Information Commissioner (OAIC) using the online Privacy Complaints Form, which can be accessed via the OAIC's website at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>. The OAIC can also receive complaints via mail, fax or email using the details provided below. If you need help lodging a complaint, you can call the OAIC enquiries line on 1300 363 992.

### **Director of Privacy Case Management**

**Officer of the Australian Information Commissioner**

**GPO Box 5218**

**Sydney NSW 2001**

**(P) 1300 363 992**

**(F) 02 9284 9666**

**(E) [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)**

## **Additional information**

Manildra reserves the right to modify this Privacy Policy from time to time to reflect our current privacy practices. We will notify you of these changes by publishing them on our website – we will not separately notify you of these changes.

You may request a copy of this Privacy Policy in a particular form and we will take such steps as are reasonable in the circumstances to give you a copy in that form, free of charge. However, should your request for access in a particular form be declined, or an access charge is imposed, we will explain this decision to you.