

Privacy Policy

1 Overview

Precision Administration Services Pty Ltd (Precision), (ABN 47 098 977 667, AFSL No. 246 604) is wholly owned by Sunsuper Pty Ltd (ABN 88 010 720 840) as Trustee for the Sunsuper Superannuation Fund (Sunsuper) (ABN 98 503 137 921). Precision owns and operates the clearing house products “Sunsuper clearing house” and “Beam”.

At Precision we aim to provide employers with the best possible service and in doing so we are committed to protecting your and your employees’ privacy and the security of your personal information.

We are required under the *Privacy Act 1988* (Cth) (‘the Privacy Act’) to have an up-to-date privacy policy with information about how Precision collects, uses and manages your personal information, including personal information collected via our website. This policy describes how we will comply with our obligations under the Privacy Act, and manage the personal information we collect.

This policy applies to your interactions with, and services provided by, Precision in relation to its clearing house products. It does not relate to any interactions or services provided by Precision in its capacity as a superannuation administration service for Sunsuper. Any interactions you, or any of your employees who are Sunsuper members, have with Sunsuper and Precision in regards to superannuation administration, are subject to the Sunsuper Privacy Policy available here: <https://www.sunsuper.com.au/content/privacy.cfm>

You should note that the Sunsuper and the Beam websites contain links and references to other websites to which neither Sunsuper nor Precision’s privacy policy applies. You should review the privacy policy of each of those websites and assess whether those policies are acceptable to you before you use those websites.

2 What does ‘personal information’ mean?

“Personal information” means information or an opinion about an identified individual, or an individual who is reasonably identifiable.

Personal information includes ‘sensitive information’. Sensitive information is any personal information about your racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual preferences or practices, criminal record, health, genetic or biometric information.

3 What personal information do we collect?

The type of personal information we collect and hold about you will depend on the dealings you have with Precision. When you deal with Precision (including for the purposes described in section 4 of this policy) the types of personal information you may be required to provide include:

- your contact details and Australian Business Number
- your employees' contact details, date of birth, gender, occupation, salary information, employer and employment history;
- your employee's Tax File Number; and
- your bank account or other financial institution details.

4 For what purposes will Precision use your personal information?

We collect, use and disclose your and your employees' personal information in order to administer the clearing house, including passing information to superannuation funds to facilitate the allocation of superannuation contributions, quality assurance and reporting and related services, including for the following purposes:

- Your identification details are used to process your application, manage your participation via the clearing house and related systems, process superannuation contributions through the clearing house and to ensure that we comply with our legal and regulatory obligations.
- Your employees' Tax File Numbers are collected in order to accept all types of contributions and to ensure superannuation is taxed correctly.
- Your identification details are used to register your attendance at events and seminars, when you enter into competitions, and to provide you with information about important changes to the clearing house and related services.
- We may also use your personal information for any purpose:
- for which your personal information was originally collected or you have consented;
- for enforcement related activities conducted by, or on behalf of, an enforcement body; or
- which is authorised or required by a court/tribunal order or an Australian law.

We may also collect, use and disclose your personal information to provide you with information about our products and services and products offered by other parties that we believe may be of interest to you (including by way of direct mail, telephone, email, SMS and MMS, secure online portals, and online advertising and marketing) or to request your feedback for research purposes. You always have the right to opt-

out of receiving such information. You may exercise that right by contacting us as set out below in section 14.

5 How do we collect personal information?

Precision will generally collect your personal information as much as possible directly from you. On occasion, we may collect your personal information from publicly available sources of information and from third parties. Examples of third parties we may collect your personal information from include

- If we cannot contact you we may try to obtain your contact details through other organisations that provide contact details such as Australia Post and Australian Taxation Office.
- We may also collect your personal information from direct marketing organisations and data providers.

We only collect 'sensitive information' if you have consented to the collection of the information and the information is reasonably necessary for one or more of our functions or activities or if the collection of sensitive information is authorised or required by a court/tribunal order or an Australian law, including the relevant Australian Laws set out in Appendix A.

6 Who do we disclose your personal information to?

As set out in sections 4 and 5 above, there are a range of people and organisations we disclose your personal information to and collect your personal information from. The particular party we may disclose your personal information to will depend on the dealings you have with Precision. Some examples of the parties to whom we may disclose your personal information include:

- Mail and electronic mail service providers for communication and other information.
- Legal advisers and other experts.
- Regulatory authorities and legal bodies as required by law (e.g. Australian Taxation Office, the Australian Transaction Reports and Analysis Centre (AUSTRAC), Australian Prudential Regulation Authority (APRA) or a Court or tribunal).
- Auditors – in order to assist them in conducting their independent audit and review activities of Precision's financial statements and operations.
- Other third party service providers so that they can provide contracted services to Precision such as information technology support, hosting services, telephony services, mailing or sending other documentation.

We may also share your personal information with an organisation where we have obtained your consent to do so.

7. Notifiable data breaches

On 22 February 2018, amendments to the Privacy Act took effect, introducing a scheme for notifying certain data breaches. As a result of these amendments, Sunsuper must notify the Office of the Australian Information Commissioner (OAIC) and the affected individual(s) if:

- there is unauthorised access to, unauthorised disclosure, or loss of personal information;
- this is likely to result in serious harm to one or more individuals; and
- Sunsuper has not been able to prevent the likely risk of serious harm with remedial action.

You can find more information about the Scheme on the OAIC website at www.oaic.gov.au.

8 Do we disclose your personal information overseas?

Precision will only disclose your personal information to a recipient overseas in accordance with the Privacy Act. Circumstances in which we will do this include:

- you have asked us to or we have your consent to do so; OR
- we have outsourced a business activity or function to an overseas provider; and
- we reasonably believe that the overseas recipient is subject to a law or binding scheme that protects the information in a way that is substantially similar to the way the information is protected under the Privacy Act and the Australian Privacy Principles, and there are mechanisms you can access to take action to enforce that protection; OR
- the disclosure is required or authorised by or under an Australian law or a court/tribunal order.

In order to provide clearing house services, Precision does not currently disclose information to any overseas recipients.

9 Do you have to provide your personal information to us?

If lawful and practicable, we offer you the opportunity to deal with us anonymously or by using a pseudonym. For example, we can provide general information to you about our products or services, or general guidance on how to fill out our forms without collecting any personal information.

However, in order to provide our services to you it is normally impracticable for us to deal with you anonymously or by using a pseudonym. For example if you do not provide your personal information to us, Precision will be unable to properly administer your benefits, notify you about your entitlements, or adequately provide our services.

10 Can you access the personal information we hold about you?

You may request access to any of the personal information we hold about you by contacting us as set out below in section 14. A summary of personal information such as your name and contact details, you have with us is available to you upon request. We will provide you with access to your personal information in accordance with the Privacy Act. Under the Privacy Act we can deny access to some or all of your personal information in specified circumstances, and will provide reasons for any refusal in writing.

11 Can you correct any personal information held by us that is incorrect?

Precision endeavours to ensure that the personal information we hold about you is accurate, up-to-date, complete, and relevant and not misleading. Please let us know if you believe any of your personal information is incorrect by contacting us as set out below in section 14.

To ensure that the information we hold about you remains accurate, complete and up-to-date, we may ask you to check and correct your personal details from time to time. We may do this, when you make a telephone enquiry, or through other means.

12 How do we protect your personal information?

Precision has security policies and systems in place to protect your and your employee's personal information. We implement multiple layers of security controls throughout our systems so that in the event that one control fails, or a vulnerability is exploited, there are other measures still in place to protect your personal information.

The people who handle personal information have the training and skills to protect your personal information from unauthorised access or misuse.

Our websites use industry standard security protocols to protect the personal information you disclose in using our online facilities. Precision uses encryption to provide more secure communications when using our clearing house facilities. In addition, when you sign up to use Sunsuper clearing house (including Employer Online) or Beam you must read and accept terms and conditions relating to privacy and security.

You can review the Terms and Conditions below:

- [Employer Online Terms and Conditions](#)
- [Sunsuper clearing house PDS](#)
- Please contact us or your payroll software provider for an up to date copy of the Beam PDS

13 Cookies

The Sunsuper & any Precision websites use “cookies” to provide a number of services to you. A cookie is a piece of data that a website can send to your browser, which may then be stored on your computer. Cookies generally allow the website to interact more efficiently with your computer. Usually you can set your browser to notify you before you receive a cookie so that you can decide whether to accept it. You may also be able to set your browser to turn off cookies. However, sometimes not accepting a cookie may affect your use of our website(s). We sometimes use cookies to monitor which pages on our website(s) you visit, in order to improve our service.

14 Who should you contact if you have any questions regarding our Privacy Policy?

Precision has an appointed a Privacy Officer. If you have any queries you can contact us by the following means:

Call: 13 11 84

Email: Contact Us Online at www.sunsuper.com.au/contactus

Mail: The Privacy Officer

Precision Administration Services Pty Ltd

GPO Box 2924

Brisbane Qld 4001

15 Can you complain about a breach of your privacy?

If you believe that we have not protected your personal information as set out in this privacy policy you may lodge a complaint with us by phone, email, or mail:

Call: 13 11 84

Email: Contact Us Online at www.sunsuper.com.au/contactus

Mail: The Privacy Officer

Precision Administration Services Pty Ltd

GPO Box 2924

Brisbane Qld 4001

We will endeavour to resolve the issue as quickly as possible. If we have not resolved your complaint within 21 days, we will write to you about the progress of your complaint.

If you are not happy with Precision's response to your complaint or Precision has not responded within 30 days, you can refer your complaint to the Office of the Australian Information Commissioner (OAIC) by:

- the online Privacy Complaint form: located at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>
- mail ; GPO Box 5218, Sydney NSW 2001
- fax: +61 2 9284 9666
- email : enquiries@oaic.gov.au
- phone: 1300 363 992

Full details about making a complaint to the OAIC can be obtained at <http://www.oaic.gov.au/privacy/making-a-privacy-complaint>

16 Changes to this privacy policy

This privacy policy may change from time to time. Before providing us with personal information, please check this policy for any changes either at www.sunsuper.com.au/precisionprivacy or by contacting us as set out above in section 14 to request an up to date copy. This Privacy Policy was last updated 28 May 2018.

Appendix A

Australian Laws under which Precision is required or authorised to collect information.

Anti-Money Laundering and Counter-Terrorism Financing Act 2006

Corporations Act 2001

Income Tax Assessment Act 1936

Income Tax Assessment Act 1997

Privacy Act 1988

Superannuation (Unclaimed Money and Lost Members) Act 1999

Superannuation Industry (Supervision) Act 1993

Precision clearing house privacy collection notice

Information you provide to Beam or the Sunsuper clearing house will be used for the purpose of administering the clearing house, including passing information to superannuation funds, quality assurance and reporting.

The Sunsuper clearing house and Beam are bound by the Privacy Act 1988 in terms of collection and handling of personal information and tax file numbers (TFNs). The collection of this information is authorised by the Superannuation Guarantee (Administration) Act 1992.

This information may be disclosed to the relevant super funds and financial institutions in relation to payments under the clearing house program, and relevant government agencies, or as authorised or required by law.

To ensure that your business's employees are made aware of how we intend to use and disclose the information collected by the clearing house, we ask that you print and provide your employees with the following Employee privacy note.

Employee privacy note

The information you have provided to your employer will be used by the Sunsuper clearing house and/or Beam to facilitate superannuation payments to you.

The collection of this information is authorised by the Superannuation Guarantee (Administration) Act 1992.

This information may be disclosed to the relevant super funds and financial institutions in relation to payments under the clearing house program and relevant government agencies, or as authorised or required by law.

While it is not compulsory for you to provide your tax file number (TFN) to your super fund, if you choose not to:

- your super fund may have to pay extra income tax on contributions your employer makes for you (including salary sacrifice) and may take this extra money out of your super account
- your super fund may not be able to accept some contributions
- you may miss out on super co-contributions even if otherwise eligible.