

Privacy Policy

1 Overview

Precision Administration Services Pty Ltd (“Precision”, “We”), (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 “Beam”, a clearing house product and single-touch payroll (STP) reporting service, and “Sunsuper clearing house”, a clearing house product.

At Precision we aim to provide employers with the best possible service and in doing so we are committed to protecting their employees’ privacy, and the security of personal information we receive and have access to in providing clearing house products and STP services to employers.

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 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 the interactions of employers with, and services provided by, Precision in relation to its products and services. It does not relate to any interactions or services provided by Precision in its capacity as a superannuation administration service for Sunsuper. Any interactions that employers (or individual 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 an individual’s 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?

When dealing with Precision in relation to clearing house products and/or STP reporting services, the types of personal information that Precision may require and collect include:

- employer contact details and Australian Business Number
- employees':
 - contact details, date of birth, gender, occupation, salary information, employer and employment history;
 - Tax File Number; and
 - salary and wages, allowances, deductions (for example, workplace giving) and other payments, pay as you go (PAYG) withholding and superannuation information.
- employer bank account or other financial institution details.

4 For what purposes will we use your personal information?

We collect, use and disclose 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:

- Employer identification details are used to process an application, manage 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.
- employees' Tax File Numbers are collected in order to accept all types of contributions and to ensure superannuation is taxed correctly.
- Individuals' identification details are used to register attendance at events and seminars, when they enter into competitions, and to provide them with information about important changes to the clearing house and related services.

We may also use personal information for any purpose:

- for which the personal information was originally collected, or where the individual has 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 also collect, use or disclose employees' personal information in order to provide STP reporting services, to help employers meet their ATO reporting obligations.

We may also collect, use and disclose personal information (being contact details for employers who use Sunsuper clearing house and Beam's clearing house product, and for people using Sunsuper clearing house and Beam's clearing house product on behalf of employers) to provide employers 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 personal information about an individual as much as possible directly from that individual. In providing clearing house products and STP services to individual employers, Precision will collect personal information about employees from the employers. On occasion, we may collect personal information from publicly available sources of information and from other third parties. Examples of other third parties we may collect personal information about an individual from include:

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

We only collect 'sensitive information' if the individual has consented to the collection of the information and the sensitive 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.

We will also collect from employers personal information about their employees in order to facilitate superannuation contributions.

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 personal information to and collect personal information from. Some examples of the parties to whom we may disclose 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 personal information about an individual with an organisation where we have obtained the individual's 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, Precision 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
- Precision 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 personal information to a recipient overseas in accordance with the Privacy Act. Circumstances in which we will do this may include where:

- the individual has asked us to or we have their 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 individuals 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 products and STP reporting services, Precision does not currently disclose personal information to any overseas recipients.

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

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

However, in order to provide clearing house products and STP reporting services it is normally impracticable for us to deal with individuals anonymously or by using a pseudonym. For example if you are an employer and do not provide employee personal information to us, Precision will be unable to provide clearing house products and STP reporting services to you.

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

Individuals may request access to any of the personal information we hold about them by contacting us as set out below in section 14. A summary of personal information that we hold such as an individual's name and contact details, is available to the individual upon request. We will provide individuals with access to their personal information in accordance with the Privacy Act. Under the Privacy Act we can deny access to some or all of the personal information requested by an individual 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 individuals is accurate, up-to-date, complete, and relevant. Please let us know if you believe any of the personal information we hold is incorrect by contacting us as set out below in section 14.

To ensure that the information we hold remains accurate, complete and up-to-date, we may ask individuals to check and correct their personal details from time to time. We may do this, when they 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 the personal information we hold. 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 personal information.

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

Our websites use industry standard security protocols to protect the personal information disclose to us through our online facilities. Precision uses encryption to provide more secure communications when using our clearing house facilities. In addition, when an employer signs up to use our products and services they must read and accept terms and conditions relating to privacy and security.

Employers can review the Terms and Conditions in the relevant PDS – contact us or your payroll software provider for an up to date copy.

13 Cookies

The Sunsuper & any Precision websites use “cookies” to provide a number of services to website users. 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

14 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>

15 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 1 April 2019.

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 privacy collection notice

Information you provide to Precision will be used for the purpose of administering clearing house products, including passing information to superannuation funds, quality assurance and reporting, and for the provision of STP services.

Precision is bound by the Privacy Act 1988 in its 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 in relation to clearing house products. 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. Please refer to section 6 of the Precision Privacy Policy for more details of who we may disclose personal information to.

To ensure that your employees are made aware of how we intend to use and disclose personal information collected by Precision in providing clearing house products and STP reporting services, we ask that you print and provide your employees with the following Employee privacy note.

Employee privacy note

You should read this Employee Privacy Note in conjunction with the Precision Privacy Policy (if you have been provided with this note by itself the Precision Privacy Policy can be accessed at beamconnect.com.au/privacy-policy).

Information you have provided to your employer will be used by Precision to facilitate superannuation payments to you and/or provide STP reporting services to your employer.

Please refer to section 6 of the Precision Privacy Policy for details of who we may disclose your personal information to.

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

The Precision Privacy Policy contains information about how you can seek access to and correction of your personal information, and how you may complain if you are not satisfied that Precision has appropriately protected your privacy and complied with privacy law.

Additional information if your superannuation payments are made via Beam or Sunsuper clearing house: *The collection of your personal information in order to facilitate your superannuation payments 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:

- o 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*
- o your super fund may not be able to accept some contributions*
- o you may miss out on super co-contributions even if otherwise eligible.*

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