

privacy policy

Prepared by

Company Secretary & General Counsel



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1. We respect your privacy

Your privacy is important to us. This Policy explains how H.E.S.T. Australia Limited (referred to in this Policy as "us", "our", or "we") manages the personal information we collect as trustee of Health Employees Superannuation Trust Australia ('HESTA'). We are committed to managing your personal information in accordance with the *Privacy Act 1988* ('Privacy Act') and the Australian Privacy Principles, and being open about how we manage your personal information.

We may, from time to time, review and update this Policy including to take into account new laws, regulations and technology. All personal information held by us will be governed by our most recent Policy, posted on our website (www.hesta.com.au/about-us/privacy.html). This Policy applies to our collection, use and disclosure of personal information.

2. Collection of personal information

Types of personal information we collect

We will only collect personal information which is necessary for the purposes of carrying out our functions and activities as a superannuation trustee and provider of financial products and services. The personal information we collect may include:

- name
- date of birth
- Tax File Number
- employment details
- contact details
- financial information
- gender
- details of your beneficiaries
- other information necessary to provide products and services to you.
- other information you may make publically available online (including but not limited to information on social media platforms)
- information from your dealings with our web sites, products, services, content and advertising, including location, geo-location information, device ID, computer and network information, page view data, site traffic, ad information, IP address and web logging data.

We may also collect sensitive personal information. This will generally be limited to information about health but may include other sensitive personal information.

How we collect personal information

We aim to collect personal information in a fair and lawful manner, which is not unreasonably intrusive. Personal information is generally collected directly from the person to whom the information relates if it is reasonable and practical to do so, however this may not always be the case. For example, information about employment details may be collected from an employer. Where information is collected from a third party, it is the third party's responsibility to notify the person about the disclosure of their personal information to us.

In some circumstances, we may provide you access to our online communities through the option of a third party platform sign on (including but not limited to, social sign ons). In this case we will be accessing and collecting the personal information which you have authorised the third party platform to pass on to us. Where we collect personal information from third parties, we will ensure that the collection is conducted in a fair and lawful manner and the information is reasonably necessary for our functions or activities.

Sensitive personal information may be collected from the person to whom the information relates, from medical practitioners or from employers, but only where the person has given consent. In the event that we are required to collect sensitive personal information, we will notify you of this at the point of collection and obtain your consent to collect and hold this sensitive personal information.

When collecting personal information, we may collect it in ways including:

- through access and use of our website including registering for our Online Member services or Employer Online services;
- when you enter into promotions, competitions or respond to surveys;
- when you sign up to join any of our online communities;
- with your express consent when you access any applications within HESTA's social media accounts;
- when you download and use any of our digital publications or mobile applications;
- during conversations with our representatives; or
- written requests – in writing or by email.

Personal information may also be collected on our behalf by our service providers.

What can happen if we are unable to collect personal information

For some types of information we request, you can choose not to provide it. However, if we are unable to collect the information, or the information provided is not complete or accurate, this may:

- prevent or delay the processing of requests;
- affect eligibility for insurance cover or insurance benefits;
- prevent us from contacting you; or

- have taxation or legal consequences.

3. Use of personal information

In carrying out our functions as a superannuation trustee and provider of financial products and services we may use personal information we collect about you for our business functions and activities, which may include the following:

- providing you with information, products or services you have requested, including where we engage third parties to provide you with goods or services on our behalf;
- establishing and verifying identity;
- displaying content and advertising that are customised to your interests, preferences and experiences;
- establishing membership in HESTA;
- managing, administering, investing, and paying or transferring superannuation benefits;
- assessing eligibility for insurance cover or insurance benefits;
- assessing potential death benefit claims;
- enabling us to provide information about superannuation and other related financial products and services;
- managing and resolving complaints made;
- providing financial education and advice;
- providing notices and statements;
- marketing and research to improve products and services;
- personalising and customising your experiences on our website or applications “apps”;
- using aggregated or de-identified information for the purposes of data analysis, research and reporting;
- complying with regulatory or other legal requirements including reporting obligations;
- using information including IP addresses to assist with risk management, cyber security and fraud prevention activities; or
- for any other use required or permitted by law or any other purpose communicated to you at the time that the personal information was collected or for which you provided your consent.

We may use your personal information for a secondary purpose if that secondary purpose is related to the purposes listed in this section three, if we have your consent or if otherwise provided for under the Privacy Act.

Generally, we will only collect and use your personal information in accordance with this Policy. In the event that we collect or use personal information in ways other than as stated in this Policy, we will ensure that we do so in accordance with the Privacy Act.

4. Direct Marketing

We may use personal information to send users direct marketing communications - including information about products and services or other opportunities available to members of HESTA that we consider may be of interest to you. At any time you may opt-out of receiving marketing communications by contacting us or by using opt-out facilities provided in the marketing communications. We will not sell your personal information to third parties for the purposes of direct marketing.

You can tell us at any time if you do not wish us to disclose your information to other parties such as our related organisations or third parties for marketing purposes. To do this, you just need to contact our Privacy Officer.

Sometimes we use information from our collected records to produce aggregated data. This aggregated data does not identify individuals. We use the data for research purposes and product developments and may share the data with third parties.

5. How we hold personal information

We may hold personal information in either electronic or hard copy form. We take reasonable steps to ensure personal information is protected from misuse, interference loss, unauthorised access, modification or disclosure in accordance with the Privacy Act. This may include, but is not limited to ensuring we or any service provider who maintains electronic records has appropriate IT data security policies in place, and engaging secure third party storage providers for hard copy records. We undertake regular staff training to ensure our staff are aware of our privacy commitments and obligations in relation to the collection, use and disclosure of personal information. Personal information is destroyed or de-identified when no longer needed or when we are no longer required by law to retain it (whichever is the later).

6. Disclosure of personal information

We may disclose personal information to:

- Employers, trustees of other superannuation funds, and beneficiaries of death benefits as required in our capacity as a superannuation trustee;
- Government bodies including the Australian Taxation Office, the Australian Securities and Investment Commission, the Australian Prudential Regulation Authority, the Australian Transaction Reports and Analysis Centre, the Superannuation Complaints Tribunal, the Financial Services Ombudsman, the Courts and any other bodies or persons where it is required or authorised by law;
- Any third party nominated by you where authorisation has been provided by you in writing; and

- Third party service providers who assist us in providing products and services, which may include an administrator, insurers, underwriters, medical advisors, legal advisors, auditors, actuaries, mail houses, research companies, and information technology providers. Generally, we require that organisations who handle or obtain personal information as service providers to us agree to comply with the *Privacy Act*, the Australian Privacy Principles and this Policy. Information disclosed to our insurer may be disclosed to other parties such as re- insurers, claims investigators, medical practitioners, medical services or other organisations providing services in the collection, collation, or assessment of personal information (including health information) and other relevant professionals where you apply for additional insurance cover, and organisations undertaking compliance reviews of the accuracy or completeness of the insurer's information, each of whom may in turn disclose information about you back to us or as permitted or required by law.

In certain circumstances, we may disclose your personal information where required or authorised to do so by law, including in emergency situations and to assist law enforcement agencies. We will always ensure that those to whom we disclose your personal information have the legal right to receive it.

We will only disclose sensitive personal information where consent has been provided, however without consent we may not be able to process insurance applications or assess claims.

7. Disclosure of personal information outside of Australia

There are some circumstances where personal information is disclosed to parties outside of Australia. This may include where we engage a third party service provider located outside of Australia, or, where an Australian third party service provider engages a sub service provider located outside of Australia. This will include the following:

- when we engage an administrator who engages with sub service providers located in United States, India, Singapore, Canada, Malaysia, New Zealand, France, Germany, Papua New Guinea, China, South Africa and the United Kingdom; and
- when we engage delivery marketing technology service provider who may use personal information in the United States.

We take reasonable steps to ensure that the overseas recipients of personal information are subject to appropriate contractual obligations to safeguard and protect your personal information and comply with applicable privacy obligations.

8. Quality of personal information

We rely on accurate, complete and up-to date personal information to provide products and services. We regularly request you to check the accuracy of the personal information we hold about you (such as the information on your Member Statements). We also provide a facility to update your personal information via a toll free helpline on

1800 813 327 and the internet at hesta.com.au/mol

However, we must rely on you to advise us of changes to your personal information. We encourage you to advise us immediately of any changes to your personal information.

9. Access and correction of personal information

You have a right to know what information we hold about you and to have it corrected if required. To access or request correction of the personal information we hold about you please call 1800 813 327. We aim to respond to your request within 30 days. Under the Australian Privacy Principles there are some circumstances in which requests to access or change your information may be denied. If this applies to you, we will provide our reasons for refusal in writing. If you disagree with our decision you may lodge a complaint through our complaints process.

The lodging of a request for access to information is free of charge. Information will usually be provided free of charge, however we reserve the right to impose reasonable charges for provision of information either generally or on a case-by-case basis.

10. Privacy and the internet

Email

If you send us an email message requesting information, we will use your email address and other information you supply to respond to your request. If you choose to receive any of our updates via email we will only use the details you have provided for the service you have chosen. You are able to unsubscribe at any time. Personal information will be retained only for as long as necessary to fulfill the purpose for which the information was collected, or as required by law.

Cookies/re-targeting codes and analytics

We use cookies to assist you in accessing information on our website or applications. Cookies are a way of storing data on your computer so you do not have to enter the same information every time you visit our website. They are small text files that are transferred to a user's computer hard drive by a website or app for the purpose of storing information about a user's identity, browser type or website visiting patterns. We may use cookies so that you can personalise the site to meet your own needs. We do not store any of your personal information when we do this.

If you have any concerns about cookies you can adjust your internet browser to disable cookies, however we may not be able to provide you with all the service or functionality you require on our website or apps if you choose to do so.

We, and our service providers, use the information collected from cookies for a number of reasons including the following:

- for statistical purposes in order to track the number of users we have and how often they visit our website or apps;
- to provide data, ratings and other information for industry and other public reporting;

- to provide you with a more customised, convenient and personal experience on our websites or apps;
- to track who has viewed an advertisement or clicked-through an advertisement; and
- to provide you with a more targeted advertising experience both on and off our websites or apps and allowing us to review how effective an advertising campaign has been.

We may engage various analytic programs, including but not limited to Facebook Custom Audience, Google Analytics and Adobe Analytics to analyse the performance of our websites and apps and to provide us with reports that contain aggregated, de-identified information that helps us to understand how you use our websites or apps. This information is anonymous and helps us with the selection of advertisements for groups of individuals.

We may also use Google features (including Google Remarketing, Google Display Network Impressions Reporting, the Double Click Campaign Manager and Google Analytics Demographics and Interest Reporting) on our websites and apps. Google Analytics uses both first party and third party cookies to record internet traffic information such as when, and how many times, you have visited our website or apps. We, and some third parties (including Google and Facebook) also use the information to improve advertising selection for groups of individuals based on demographic information. The cookies allow us and other third parties (including Google and Facebook) to evaluate your interactions with advertising services on our websites and apps and serve targeted advertising on those websites and apps and across the Internet. We have enabled Google features for Display Advertising, which allows Google and other third parties to advertise to you on websites and apps and across the Internet.

By using Google Ads Settings (located at <https://www.google.com/settings/ads>), you can opt out of these features at any time and customise your Google Display Network Ads.

You can opt-out of Adobe Analytics tracking and on-site personalization services by following the instructions on <http://www.adobe.com/au/privacy/opt-out.html#4>.

You can manage your Facebook settings at any time and customize your advertising preferences by following the instructions on <http://www.facebook.com/settings>.

For more general information about how to opt out of cookies being used by third party ad servers visit www.networkadvertising.org/choices.

Mobile applications

We, or one of our service providers, may collect information through our mobile applications ('apps') to assist us in understanding how you use our apps, how the apps are performing and to help us in the selection of advertisements for groups of individuals. Our access to this information is in accordance with the terms you have agreed to with the applicable app store from which you downloaded our app.

Geo-Targeting/IP Locators

Our website and apps may make use of software that detects what geographical region users are accessing from in order to provide users with information and resources specific to their particular geographical area.

Web links

The HESTA website may contain links to the websites of other organisations. We are not responsible for the privacy practices of the organisations whose websites you have accessed through these links. These organisations are responsible for their own privacy practices and you should check their privacy statements before providing any personal information to them.

Security

While all reasonable steps are taken to protect personal information provided through the internet, you should be aware that there are general risks in transmitting personal information via the internet. You should assess these potential risks before deciding whether to use our online services. If you do not wish to transmit personal information over the internet you may provide information to us by mail, telephone or fax.

11. Privacy Complaints

If you consider that any action by us breaches this Policy or the Australian Privacy Principles or otherwise does not respect your privacy, you can make a complaint.

1. Free call 1800 813 327 to discuss your concerns.
2. If your concerns can't be resolved immediately, you can provide more detailed information about your complaint to using the contact details set out below in section 12:
3. We'll investigate your complaint and make every effort to respond within 10 business days. If we can't fully respond in that time, we'll endeavor to keep you informed about the progress of your complaint. Our response will detail the outcome of the investigation and the reason for our decision. This process is free of charge.
4. If you are still not satisfied with the outcome of your complaint, you can contact the Australian Information Commissioner using the contact details set out below in section 12. Alternatively, if your complaint is in relation to health information you can contact the Health Services Commissioner using the contact details set out below in section 12.

12.Contact details

If you feel that your privacy has not been respected or that we have conducted ourselves inconsistently with this Policy, the Australian Privacy Principles or the Privacy Act in respect of your personal information, or for any other queries, problems, complaints or communication in relation to this Policy, please contact us:

Privacy Officer
HESTA
PO Box 600
Carlton South VIC 3053

You can find out more information about the Privacy Act and the Australian Privacy Principles from the Office of the Australian Information Commissioner. The Information Commissioner may be contacted at www.oaic.gov.au, by email at enquiries@oaic.gov.au or by phone at 1300 363 992.

The Health Services Commissioner may be contacted at www.health.vic.gov.au/hsc/ by email at hsc@dhhs.vic.gov.au or by phone at 1300 582 113.

Policy last updated: February 2016

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