

## Privacy Policy

Qantas Superannuation Limited ABN 47 003 806 960 / AFSL 288330 (Trustee), is the trustee of the Qantas Superannuation Plan (the Plan). The Trustee is committed to respecting the privacy of our members' and other individuals' personal information. Personal information is information which identifies an individual or from which the identity of the individual can be reasonably ascertained. An individual's name, address and telephone number are examples of an individual's personal information.

The National Privacy Principles (NPPs) under the *Privacy Act* 1988 (Privacy Act) apply to the way we manage an individual's personal information. We are committed to complying with these requirements and any other applicable laws to protect an individual's privacy.

### 1 This Policy

This Policy outlines our personal information management practices. It covers the following areas:

- The Trustee and the Plan
- Collection of personal information
- Use and disclosure of personal information
- Access to and updating personal information
- Security of personal information
- Contact details
- Complaints
- Changes to this Policy

In addition to our general personal information management practices, section 7 of this Policy covers the way a member's personal information, or the personal information of any other individual, is treated when they access and interact with the Plan website at [www.qantassuper.com.au](http://www.qantassuper.com.au)

### 2 The Trustee and the Plan

The Trustee is a corporate trustee and has a board comprising five company-appointed Directors and five member-elected Directors.

The Trustee is responsible for ensuring that the Plan operates in accordance with the Plan's Trust Deed and Rules and all relevant laws and regulations. The principal activities of the Trustee are the administration and management of the Plan and the calculation and disbursement of superannuation entitlements and death and disability benefits from the Plan.

### 3 Collection

We only collect personal information about an individual which is necessary to carry out our functions and activities or that we are required by law to collect (eg tax and superannuation laws and anti-money laundering and counter-terrorism financing legislation). For example, we collect personal information about individuals which is necessary to:

- provide members with membership of the Plan;
- manage and administer the Plan including paying benefits to a member or their dependants or legal personal representative;
- arrange insurance cover;
- liaise with a member's employer in meeting its superannuation obligations;
- communicate with members about their entitlements or other matters required by law; and
- ensure that the Plan operates in accordance with the Plan's Trust Deed and any relevant laws.

## Consequences if information is not provided

When we ask you to provide information to us, if you do not provide that information, or if that information is incomplete or inaccurate it may:

- delay or prevent the processing or payment of your superannuation benefit or death or disability claim;
- result in your benefits being reduced;
- result in you paying more tax than may otherwise apply; or
- prevent us from being able to contact you.

## Collection of sensitive information

In certain circumstances, we may collect sensitive information about an individual. Sensitive information under the Privacy Act includes information or an opinion about an individual's racial or ethnic origin, political opinions, philosophical or religious beliefs, sexual preferences, criminal record and health information. For example, we may collect information about a member's health when a claim for disability is made by a member. We will only collect sensitive information about an individual with the consent of that individual, or otherwise in accordance with the law.

## Indirect collection of information

Generally, we try to collect personal information directly from the individual. However, there are certain situations in which we may collect personal information about an individual from someone else. For example, we may collect personal information about a member from a party we have appointed to assist the Trustee in administering the Plan, that member's employer or we may collect personal information about another individual from the member such as a member's nominated beneficiary.

# 4 Use and disclosure

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We generally use and disclose an individual's personal information for purposes related to the main purpose for which the information was collected. We may also use or disclose an individual's personal information if the individual has consented to the use or disclosure.

For example, we may disclose an individual's personal information to our service providers who assist us in administering the Plan. These may include superannuation fund administrators, doctors, medical consultants, external assessors, professional advisers, mailing houses and Aviation Health Services. We will only disclose an individual's personal information to these third parties on a confidential basis so that the service provider can effectively provide those services.

We may share a member's personal information with that member's employer. We may also share an individual's personal information with our related entities. An example of when this may occur is when it is necessary for a proposed or actual corporate reorganisation or the transfer of an asset or business of a participating employer. In this case, the information may only be used or disclosed by a related entity for the main purpose for which it was collected by us, for purposes related to the main purpose or if the individual has consented.

We may otherwise use or disclose an individual's personal information where required or authorised by law, for example to government agencies such as the Australian Prudential Regulation Authority (APRA), Australian Taxation Office (ATO), Australian Securities and Investments Commission (ASIC), Superannuation Complaints Tribunal (SCT) and Australian Transaction and Reports Analysis Centre (AUSTRAC), or in emergency situations and when assisting in law enforcement.

If your benefit is transferred or rolled-over to another superannuation arrangement, your personal information will be provided to the new organisation.

The Trustee must disclose personal information as required by the *Family Law Act 1975* (including all amendments to the Act).

## 5 Accessing and updating personal information

An individual may request access to their personal information or request us to correct information that we hold about them. To make a request, please put your request in writing using the Contact Details in section 8 of this policy.

We require as many details as possible about the information requested in order to help us retrieve it. We will also require proof of your identity before we can provide you with access to your personal information.

In some circumstances, we may not be required by law to provide an individual with access or to correct their personal information. If this is the case, we will provide the individual with reasons for our decision.

## 6 Security

We take reasonable steps to protect all of the personal information we hold from misuse and loss and from unauthorised access, modification or disclosure. This protection applies in relation to information stored in both electronic and hard copy form.

## 7 The Plan's Website

This section outlines the way we handle personal information that we collect when a member or other individual uses the Plan's website which is owned by QSL under the domain name **www.qantassuper.com.au**

We outsource the development, maintenance and hosting of the website to third party service providers. We may disclose personal information about a member to our service providers so that they can effectively provide those services.

### (a) Collection of personal information

A member or another individual may visit the website without providing us with any personal information. However, we may collect personal information about an individual accessing the website if they use the "contact us" section of the website or if they log in as a member. In addition, when a member accesses the members' area of the website, a member may provide us with personal information about them or another individual. For example, a member may provide us with an alternative email address or personal information of their nominated beneficiary.

If a member provides us with personal information via the website, we will treat that information in accordance with our general personal information management practices as outlined in this Policy.

### (b) Use of cookies and web tracking

We do not use cookies or web bugs on the website to collect information about an individual. However, we do use server variables once a member has accessed the members' area of the website. If an individual has configured their browser to reject cookies, the functionality of the member's area of the website may be affected.

In order to manage the website, our service provider collects information regarding the use of the website. The information our service provider collects for this purpose includes:

- the top level domain (eg .au or .uk) of the individual;
- the length of time the individual spends on the website;
- the pages of the website the individual visits; and
- the page of this website that the individual exits the website from.

When an individual accesses the website but does not log in as a member, the web tracking information that is collected by our service provider does not identify an individual personally and is not matched with any information that could personally identify an individual.

If a member logs in as a member using their staff number and PIN, the web tracking information that is collected by our service provider may identify the individual personally. However, this information is only passed on to us in an aggregated form.

We do not track which sites an individual visits after they leave the website.

### (c) Links

We may, from time to time, include links in the website to the websites of other organisations which may be of interest to you. We are not responsible for the privacy practices of these websites.

### (d) Website security

As with any Internet transaction, the transmission of data over the Internet is not completely secure. While we take reasonable steps to protect all the personal information in our possession that we have collected via the website in accordance with our general personal information management practices, we cannot guarantee the security of all data submitted to us over the Internet.

### (e) Email

If an individual emails us, the email may contain personal information about that individual. We will treat that information in accordance with our general personal information management practices outlined in this Policy.

## 8 Contact us ▲

Questions or feedback about this Policy or an individual's personal information should be directed to:

**Postal address:** Qantas Superannuation Limited,  
Locked Bag A4075,  
SOUTH SYDNEY NSW, 1235

**Phone:** 1300 654 384 or +61 2 9374 3930

**Fax:** +61 2 9372 6288

**Email:** [info@qantassuper.com.au](mailto:info@qantassuper.com.au)

## 9 Complaints ▲

If an individual wishes to make a complaint, they can contact the Superannuation Inquiry Officer using the Contact Details above.

If an individual feels that we have not adequately dealt with their complaint, they may contact the Privacy Commissioner. Complaints should be made in writing to:

**Privacy Commissioner**  
GPO Box 5218,  
Sydney NSW 2001.

## 10 Changes to this Policy ▲

This is our current Policy outlining our personal information management practices. It replaces any other Privacy Policy published by us, either on the website or in hard copy, to date.

We may vary this Policy at any time by publishing the varied Policy on the website.

Version 5 Effective 29 April 2011