



**Qantas Superannuation Limited**

## **Privacy Policy**

**13 March 2023**

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Qantas Superannuation Limited (QSL or the Trustee) is the trustee of the Qantas Superannuation Plan (Plan or Qantas Super). The Trustee ("we", "us", "our") is bound by the Australian Privacy Principles in the Privacy Act 1988 (Cth).

We understand the importance of, and are committed to, protecting your personal information. This Privacy Policy explains how we manage your personal information, including our obligations and your rights in respect of our dealings with your personal information.

## 1 Personal information

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"Personal information" is information or opinion about an identified individual, or an individual who is reasonably identifiable.

We collect and hold personal information that is reasonably necessary for, or directly related to, one or more of our functions or activities as the trustee of the Plan, which is a regulated superannuation fund. This information may include (as well as other information):

- your name and date of birth;
- your contact details including residential address;
- your employment details, employment history and salary information;
- your tax file number;
- your contributions history;
- your nominated beneficiary details; and/or
- your claims history.

"Sensitive information" is information or opinion about an individual which is:

- personal information which is also information or an opinion about the individual's racial or ethnic origins, political opinions, political association membership, religious beliefs or affiliations, philosophical beliefs, professional or trade association membership, trade union membership, sexual orientation or practices, or criminal record; or
- health, genetic or biometric information about the individual.

We will only collect sensitive information (including health information) about you with your consent, except where we are required or permitted by law to collect your sensitive information without your consent.

## 2 Collection and use

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### **Purpose**

We collect and use personal information about you so that we can admit you as a Member of the Plan, provide you with services and benefits in connection with your Membership of the Plan and communicate with you in relation to your Membership of the Plan. We may collect and use health information about you in connection with the provision of benefits, including insured benefits.

You have the right to refuse to provide us with personal information. However, if you decide to do so, we may be unable to admit you as a Member of the Plan, provide you with services and benefits in connection with your Membership of the Plan or communicate with you. There may also be other consequences. For example, if you do not provide us with your Tax File Number, we may be unable to accept personal after-tax contributions, and additional tax deductions may be made from contributions made by your employer.

### ***Senior personnel of the Plan's service providers***

We may collect personal information for the purpose of completing due diligence assessments of our service providers, which can include an evaluation of the skill, knowledge, experience and the fitness and propriety of its senior personnel.

### **Method of collection**

We only collect personal information by lawful and fair means. We generally collect personal information directly from you, unless it is unreasonable or impracticable to do so.

If you are an employer-sponsored Member we also collect information from your employer. This information will generally come from what has been provided in your application forms, or through our contact with you or your employer. We may collect personal information about another individual, such as your nominated beneficiary, from you.

We or the Plan's insurer (Insurer) may collect personal information, including health information, about you from third parties, such as doctors or other relevant persons, to assess and process claims for benefits, including insured benefits.

The Plan's administrator (Administrator) holds your personal information on our behalf.

### **Relevant laws**

We are subject to a variety of laws, including the Superannuation Industry (Supervision) Act 1993 (Cth), the Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth) and regulations made under those Acts, which may require us to collect, hold and use information to personally identify you.

We have internal resources to manage the Notifiable Data Breaches (NDB) obligations under the Australian Privacy Act 1988 (Privacy Act) which requires us to report certain data breaches to the Office of the Australian Information Commissioner (OAIC) and, where required, the impacted members. We have a Data Breach Response Plan in place to assist us in responding quickly to suspected data breaches.

### **Unsolicited information**

If we receive personal information about you that we have not requested, and if we determine that we could not have lawfully collected that information under privacy law if we had requested it, we will destroy or de-identify the information, if it is lawful and reasonable to do so.

### 3 Disclosure

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In general, we do not use or disclose your personal information for a purpose other than:

- a purpose set out in this Privacy Policy;
- a purpose you would reasonably expect;
- a purpose required or permitted by law; or
- a purpose otherwise disclosed to you to which you have consented.

We disclose your personal information to the Administrator so that it can administer your Membership of the Plan. The Administrator may in turn disclose your personal information to its external service providers.

We or the Administrator may disclose your personal information to the Plan's insurer so that we can provide insurance benefits.

We may also disclose your personal information to other organisations, for example, to:

- your employer, if you are an employer-sponsored Member;
- our related companies (if any);
- other superannuation trustees;
- external service providers, such as accountants, auditors, lawyers, mailing houses and research consultants; and/or
- government or regulatory authorities, where required or permitted by law.

We take all reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

The Plan's administrator may disclose personal information to service providers in India and other countries outside of Australia. The Plan's insurer may disclose personal information to service providers in the United States of America. Any such disclosure will only be made for the purposes of the management and administration of the Plan, and the use of personal information is strictly controlled.

## 4 Access

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You may request access to the personal information that we hold about you by using the contact details provided below.

We will deal with your request for such access within a reasonable time. If we refuse access, we will provide you with a written notice which sets out the reasons for the refusal and the relevant provisions of the Privacy Act that we rely on to refuse access.

We may recover reasonable costs in relation to a request for access to personal information.

## 5 Accuracy

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We take reasonable steps to make sure that the personal information we collect is accurate, up-to-date and complete. We take reasonable steps to make sure that the personal information we use or disclose is accurate, up-to-date, complete and relevant. Where we believe that the personal information we hold is inaccurate, out-of-date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information.

You may also request that we correct your personal information that we hold by contacting us using the contact details provided below. We will take reasonable steps to correct the information to ensure that it is accurate, up-to-date, complete, relevant and not misleading.

We will deal with your request to correct your personal information within a reasonable time. If we do not agree with the corrections you have requested, we are not obliged to alter your personal information accordingly. However, where we refuse to correct any personal information as requested by you, we will give you a written notice which sets out the reasons for our refusal.

## 6 Security

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Your personal information is held in paper-based and electronic files. We take all reasonable steps, and require the Administrator to take all reasonable steps to ensure that your personal information which is kept in our files is protected from:

- misuse, interference and loss; and
- unauthorised access, modification or disclosure.

This means that, in respect of our paper-based files, various security systems are maintained on physical premises, and in respect of electronic files, secure electronic network systems are maintained.

When we no longer require your personal information (including when we are no longer required by law to keep records relating to you), we take reasonable steps to de-identify and/or destroy the information.

This section explains how we handle personal information collected from our website. If you have any questions or concerns about transmitting your personal information via the internet, you may contact us using the contact details provided below, as there are other ways for you to provide us with your personal information.

### Visiting our website

Anytime you access an unsecured part of our website, that is, a public page that does not require you to log on, we will collect information about your visit, such as:

- the time and date of the visit;
- any information or documentation that you download;
- your browser type; and
- your server address.

Our website also may include a number of calculators, which may require you to enter your personal details. If you save the data you enter on the calculator, this information will be stored.

### Cookies

A "cookie" is a small text file which is placed on your internet browser and which we access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e. public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so will prevent you from access to the secured pages of our website.

### Email

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided, except where permitted by law. It will not be added to any mailing lists or used for any other purpose without your consent, except where permitted by law.

### Security

We make reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. Any data containing personal information which we transmit via the internet is encrypted. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

### Links on our website

Our website may contain links to third-party websites. We advise that the terms of this Privacy Policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

## 8 Marketing

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We may use your personal information, including your contact details, to send or notify you of marketing information about other products and services that are available to you because of your membership of Qantas Super (e.g. travel offers), and to send you invitations to participate in surveys and research about Qantas Super. We may do this while you are a Member of the Plan, even if you are on the Do Not Call Register.

Your email and mobile number may be used in this way unless you let us know not to use them for this purpose. You can opt out of receiving email and text messages relating to this type of information by unsubscribing from email and text messages we send you. If you unsubscribe from email and text messages, we may still send you this type of information by post unless you opt out as described below.

You can opt out of receiving marketing information and survey/research invitations via email, text message and post by logging into your account online and changing your communication preferences, calling us on 1300 362 967 or by writing to the Privacy Officer (see contact details below).

## 9 Questions and complaints

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If you have any questions, concerns or complaints about this Privacy Policy, or our use of your personal information, please contact the Privacy Officer using the contact details provided below:

The Privacy Officer  
Qantas Superannuation Limited  
GPO Box 4303  
Melbourne VIC 3001  
Ph 1300 362 967

You can also contact the Privacy Officer if you believe that the privacy of your personal information has been compromised or is not adequately protected.

Once a complaint has been lodged, the Privacy Officer will respond to you as soon as possible.

You may also lodge a complaint with the Office of the Australian Information Commissioner by telephone: 1300 363 992 or email: [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au).

## 10 Changes to the Privacy Policy

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We may make changes to this Privacy Policy from time to time, without notice to you. An up-to-date copy of our Privacy Policy is available on our website.