

## Privacy Policy

### Evolution Super Pty Ltd

#### Our Commitment

Evolution Super is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Act 1988 (Cth) as amended, sets out a number of Australian Privacy Principles. Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au>.

Evolution Super believes that this Privacy Policy discloses how the personal information you provide to us and our representatives, is collected, used, held, disclosed and disseminated.

Our privacy policy will be provided to you without charge upon request in either hard or soft copy.

We encourage you to check out website regularly for any updates to our Privacy Policy. In the event that any changes to our privacy policy will have an adverse effect on you, we will place a notice on our website.

#### How We Collect Personal Information

Generally we will collect personal information directly from you. Sometimes it may be necessary for us to collect your personal information from a third party, or from a publicly available source. We will only collect personal information in that way where you have consented, you would reasonably expect us to collect personal information in that way, or if it is necessary for a specific purpose in the performance of our services.

We may also collect personal information about you from your use of our website and information you provide to us through contact mailboxes or through the registration process on our website.

#### How We Use Your Personal Information

The main purposes for which we collect personal information are:

- where it is necessary for us to provide our services;
- to maintain contact with clients;
- to keep clients and contacts informed of the services we offer and of current developments;
- to notify clients and contacts of events, services and service offers;
- for recruitment and employment (including expressions of interest in working for us);
- for administration and management purposes; and
- to provide you with information about other services we offer that may be relevant to you.

#### Information Collected

The type of personal information which we will ordinarily collect includes your name, bank account and investment details, contact details i.e. email, phone and address. Where relevant, we may ask you for other information. In particular, in order to perform our services, it may be necessary for us to collect bank account details, tax file numbers and details of directorships, shareholding or other investments.

We will not usually seek to collect sensitive information (e.g. data relating to professional memberships, race or ethnic origin, religious beliefs, criminal record, physical or mental health, or sexual orientation) from you. If it is necessary for us to collect sensitive information, we will obtain your explicit consent to collect and use such information.

This is subject to some exceptions including:

- the collection is required by law; and
- when the information is necessary for the establishment, exercise or defence of a legal claim.

## **How We Use the Information**

We will only use your personal information to perform professional services, respond to your requests or to provide you with further information about Evolution Super.

We may use your information to market our services, including by email. You will have the opportunity to elect not to receive further marketing information from us by emailing [admin@evolutionsuper.com.au](mailto:admin@evolutionsuper.com.au). We will endeavour to process your request within 14 days. Alternatively, if we have contacted you by email, you may use the unsubscribe function in that email to notify us that you do not want to receive further marketing information from us by email.

We will hold your personal information for only as long as is required to fulfil the purposes for which it was collected or as required by law.

We may share your personal information with third parties who we contract to assist us to provide the services requested by you. Those third parties may include service providers who assist us in performing our services such as:

- Thornton Group (Australia) Pty Ltd if they provide you with financial planning services.
- Thornton Insurance Services Pty Ltd if they provide you with general insurance services.
- mailing houses;
- your professional advisers, including your solicitor or accountant as authorised by you;
- third parties for the purpose of verification of accounts
- payment processes and experts who are contracted as part of your engagement.
- information technology service providers to maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems;
- Government and regulatory authorities and other organisations, as required or authorised by law, for example, to government or regulatory bodies for the purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue.
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business.
- a new owner of our business that will require the transfer of your personal information.

In addition, our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Evolution Super and protect your information in the same way we do. We will never sell your personal information.

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

## How We Store and Secure Your Personal Information

We keep your personal information in your client file. These files are accessible to authorised personnel only and are appropriately secured out of hours. We will take reasonable commercial measures to ensure the security of your personal information, whether kept in electronic form or hard copy.

Your personal information is also held on our computer database. All computer-based information is protected through the use of access passwords. Data is backed up regularly and stored securely off site. We use a range of physical and electronic procedures to ensure the privacy of your personal information is safeguarded. These include restricting physical access to our offices, maintaining a secure database system, passwords, encryption and firewalls. However, the internet is not secure and we cannot guarantee the security of any information sent to us via the internet.

Other measures taken are:

- Confidentiality requirements for our employees
- Security measures for systems access
- Providing a discreet environment for confidential discussions

Personal information will be treated as confidential information and sensitive information will be treated highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be archived.

## Your Information

### Ensure Your Personal Information Is Correct

Evolution Super takes all reasonable precautions to ensure that the personal information we collect, use and disclose is accurate, complete and up-to-date. To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal information as soon as possible; and
- update us with any changes to your personal information as soon as possible.

You have the right to request correction of any of your personal information by contacting us.

### Access to Your Personal Information

You have a right to access your personal information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing (for security reasons) and we will provide you with access to that personal information. Access to the requested personal information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information.

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;

- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

### **Using Government Identifiers**

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

### **Dealing with us anonymously**

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

### **Complaints Resolutions**

Please contact our General Manager if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 30 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner.

### **Our Website**

Evolution Super website provides links to third party websites. The use of your information by these third party sites is not within the control of Evolution Super and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy stands, policies and procedures.

Our Website utilises cookies to provide you with a better user experience. Cookies also allow us to identify your browser while you are using our site – they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

### **Spam Act**

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

'Electronic messaging' covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone.

Evolution Super complies with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, Evolution Super makes sure that our practices are in accordance with the Australian Privacy Principles in all activities where they deal with personal information. Personal information includes our clients contact details.

## **Internal Procedure for dealing with communications**

The three key steps Evolution Super follows:

- Consent – Only commercial electronic messages are sent with the addressee’s consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about the person and Evolution Super that is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

## **Consent to such communications**

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is okay to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

## **Comply with the law regarding viral messages**

Evolution Super ensures that Commercial Communications that include a Forwarding Facility contain a clear recommendation that the Recipient should only forward the Commercial Communication to persons with whom they have a relationship, where that relationship means that person could be said to have Consented to receiving Commercial Communications.

## **Comply with the age sensitive content of commercial communication**

Where the content of a Commercial Communications seeks to promote or inspire interaction with a product, service or event that is age sensitive, Evolution Super takes reasonable steps to ensure that such content is sent to Recipients who are legally entitled to use or participate in the product service or event.

## **Comply with the Notifiable Data Breaches Scheme**

Evolution Super is obliged to notify you if an ‘eligible data breach’ has occurred, in addition to notifying the Australian Information Commissioner (the Commissioner).

## **How to Contact Us**

General Manager:	David Lolicato
Address:	182 Fullarton Road Dulwich South Australia 5065
Telephone :	08 8274 7227
Facsimile:	08 8271 5133
E-mail:	<a href="mailto:david@evolutionsuper.com.au">david@evolutionsuper.com.au</a>