

Privacy Policy

1. Our commitment

We are committed to preserving your privacy and complying with the Privacy Act 1988 and the Australian Privacy Principles.

2. Collection and holding of personal information

2.1 Information we collect from you

We collect personal information from and about you, including contact, financial and trading information and any other personal information you may give us when you:

- a. make an enquiry about our products or services;
- b. register with us to receive further information about our products or services;
- c. complete one of our forms;
- d. ask to be placed on one of our mailing lists;
- e. visit our websites;
- f. contact, register with, post to, like or follow any of our social media pages;
- g. register for our events; or
- h. participate in our competitions, promotions or surveys.

The details of exactly what types of personal information we collect can be found on our forms and websites, and in the questions we ask when we communicate with you.

2.2 Information we collect from other parties

We may also collect information about you from other parties such as your employer, your financial advisor, the Australian Taxation Office (**ATO**), another superannuation fund of which you are a member, clearing houses, credit reporting agencies and identification verification services. In such cases, we will obtain a third party authority from you.

2.3 Sensitive information

We may collect sensitive information about you such as your health (for insurance purposes) but do not collect information about your race, religion, beliefs or sexual preference except where you have consented or where we are permitted or required by law to do so. Sensitive information will only be used for the purpose for which it was provided.

2.4 Holding and retaining your personal information

We take reasonable precautions to protect and secure your personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure.

Your personal information is held by us electronically on secure systems provided by cloud service providers. It may also be held in hardcopy form, for example, in paper files which are archived in a secure facility. Personal information held electronically is secured by passwords, encryption and firewalls in line with Australian information security standards.

Your personal information is only retained for as long as necessary to fulfil the purpose/s for which it was collected, unless we are required to retain the information for a certain period of time under an Australian law or court or tribunal order. Once no longer required, we take such steps as are reasonable in the circumstances to destroy or permanently de-identify your personal information

3. Use of personal information

We use the personal information we have collected about you in order to:

- a. provide you with information about our products and services;
- b. enable us to provide our products and services to you; and
- c. comply with our legal obligations.

We also use the personal information we have collected for market research.

Each time we collect personal information from you we will explain to you:

- why we are collecting the information;
- how we intend to use it;
- whether we are likely to disclose your personal information to overseas recipients;
- the consequences if the personal information is not collected; how you may access and correct your personal information; and
- how you can make a complaint about a privacy breach.

4. What happens if you choose not to provide the information?

You do not have to give us your personal information. However, if you choose not to, we may not be able to provide you with our products or services or more information about them.

5. Disclosure of personal information

We will not disclose information we collect about you to any third parties without your prior consent. Similarly, we will not sell any information we collect about you.

However, we may disclose personal information for the purpose specified to you at the time of collection or for other purposes if:

- a. you would reasonably expect us to disclose such information for that purpose;
- b. that purpose is related to the purpose specified to you at the time of collection, or;
- c. where we are permitted or required by law, or it is in the interests of public safety to do so.

For instance, we may disclose your personal information to entities related to us and to service providers and contractors who are engaged to provide services to us.

5.1 Tax file number

If you disclose your tax file number (TFN) to us, you authorise us, our related companies and our agents, to store and use your TFN as authorised by law.

We will use your TFN to facilitate your membership in the relevant sub-plan, to contact the ATO and other superannuation entities to find out if you have other super monies, to meet any requirements set by the ATO or other regulatory authorities, and for any other lawful superannuation purpose.

All information supplied to us is used and stored in accordance with this privacy policy.

Due to the sensitivity of TFNs and the legal restraints on their use and disclosure, if you lose or forget your TFN, we will not be able to provide it to you. You will have to ask the ATO for a copy of it.

5.2 Disclosure overseas

Some of our communications service providers are located outside of Australia, meaning your personal information may be disclosed to a recipient in other countries.

In addition, anonymised web traffic information is disclosed to third party analytics platforms when you visit our websites (who may store the information across multiple countries) and when you communicate with us through our social media applications, where the provider and its partners may collect and hold your personal information overseas.

We will not disclose your personal information to overseas recipients unless and until we have taken reasonable steps to ensure that the overseas recipient will handle your personal information in a manner consistent with the APPs, or you have consented to the transfer of the information.

5.3 Contact with you

If you provide us with your telephone number and email address, you agree and accept that we, or an agent or a related entity of us, may contact you via telephone, SMS or email. We will do this to facilitate action on your superannuation account, to confirm information, to gauge customer experience or for any other reasonable or marketing purpose. If you do not want this to happen, please email privacy@gpml.com.au.

5.4 Direct marketing

We may use your personal information to contact you with new information or offers for products or services from us and our partners. Your personal information will never be added to a general marketing database. We do not sell, rent or trade your personal information to or with third parties for the purpose of allowing them to send marketing material directly to you.

If you don't wish to receive marketing material, you may opt out by contacting us by email at privacy@gpml.com.au.

6. Privacy on the internet

The Internet is not a secure environment. If you use the Internet to send us personal information you do so at your own risk.

6.1 Website cookies

We make use of “cookies” technology on our websites. We use cookies to improve the functionality of our websites and to learn more about the way that you interact with our content. Cookies are a feature of your Internet browser which you can disable at any time.

6.2 Remarketing

Our websites use the Google AdWords remarketing service and similar services from other providers to advertise on third party websites (including Google) to previous visitors to our sites. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network, or other sites. Third-party vendors, including Google, may serve ads based on someone’s past visits to one of our websites.

Of course, any data collected will be used in accordance with our own privacy policy, Google’s privacy policy or the privacy policy of other remarketing services used by us. If you would like to opt out of Google ad personalisation, please visit Google’s [Ads Settings](#). If you would like to opt out of third-party ad personalisation, please visit the [Network Advertising Initiative opt out page](#).

6.3 Links to other websites

You may be able to access external websites by clicking on links provided on our websites. These websites aren't subject to our privacy standards and procedures. Once you leave our websites, our privacy policy no longer applies. You’ll need to review those websites directly to view a copy of their privacy policies and to ensure your personal information is protected.

6.4 Social media applications

Whilst we may use social networking platforms for communications, we won’t ask you to supply personal information publicly over these platforms. Sometimes we’ll invite you to send your details to us via private messaging, for example, to answer a question you have raised about your superannuation account.

Any personal information that you contribute to the publicly accessible sections of social media applications can be read, collected and used by other users of the application. We have little or no control over these other users and cannot guarantee that any information that you contribute to any social media applications will be handled in accordance with our privacy standards.

6.5 Data analytics

We may analyse customer information we hold against information we are permitted to use from external sources such as statistical data. Generally, this information is based on aggregated data that doesn't contain information that identifies individuals.

7. You can access and correct information

We will take all reasonable steps to ensure that the personal information which we collect, use or disclose is accurate, complete and up-to-date.

If you wish to access the information we hold about you, you are welcome to contact our Privacy Compliance Officer who will respond to you within 30 days. You can also request that information about you be corrected or deleted.

We reserve our right to refuse your request for access or correction if, for example, we consider your request to be frivolous or vexatious, or if we are legally entitled to do so. If we refuse your request, we will give you our reasons in writing and information about how to make a complaint about the refusal.

8. When you contact us

We must be certain of your identity before we can discuss your superannuation fund account with you. If you contact us to discuss your account, you must be able to prove your identity. This ensures that we are able to protect your personal information by only giving it to you or someone who can prove that they are lawfully authorised to act on your behalf.

For example, if you phone us, you can prove your identity by giving us your member number and your name and date of birth (as notified to us previously). Other details listed on your account may be used as proof of identity (such as phone number, address, etc.) depending on the circumstances.

If you have a general enquiry that does not involve discussing your personal information, you do not have to provide identification. In these situations, you will be able to deal with us without identifying yourself.

9. Updating our privacy statement

We may revise or update our privacy statement occasionally by posting it on our website. The current version at the time we collect or use your personal information is the version that will apply.

10. Complaints and further information

If you would like further information about our privacy policy, or you have a complaint about our privacy practices, please contact our Privacy Compliance Officer.

Telephone: (02) 8355 5149

Email: privacy@gpml.com.au

Post: 120 Underwood Street, Paddington NSW 2021

If you have a complaint regarding privacy that is not resolved by us to your satisfaction, you may refer your complaint to the Office of the Australian Information Commissioner (**OAIC**).

Attention: Director of Compliance (Investigations)

Telephone: 1300 363 992

Email: enquiries@oaic.gov.au

Post: OAIC, GPO Box 5218 Sydney NSW 2001