



Fact sheet: **Privacy policy**

General advice warning about using or relying on this information

The information is general information only and does not take into account your individual objectives, financial situation or needs. You should consider the information and its appropriateness, having regard to your own objectives, financial situation and needs, before making any decisions. You should seek professional financial advice tailored to your personal circumstances from an authorised financial adviser.

1. About Commonwealth Bank Group Super

Commonwealth Bank Group Super is an employer-sponsored super fund, established to provide super benefits for current, former and future employees of the Commonwealth Bank (the Bank) (including associated employers) and their spouses. The fund is not open to the general public (non-public offer) and operates on a profit-to-members model.

The trustee of the fund is Commonwealth Bank Officers Superannuation Corporation Pty Limited. The trustee holds a Registrable Superannuation Entity Licence (RSEL) and an Australian Financial Services Licence (AFSL). The Bank is the principal employer of the fund.

We are bound by the Privacy Act and the Australian Privacy Principles (APPs), upon which this policy is based.

The fund is a hybrid fund that provides defined benefit (DB) and defined contribution (DC) benefits for members. The fund consists of 14 DB divisions and 1 DC division, each with their own benefit structure. The funds under management are managed as a single pool with assets allocated between DB and DC divisions.

The trustee outsources its administration functions to third party fund administrators who receive and hold the information collected from you on behalf of the trustee.

The administrator for our DB divisions, including lifetime pensions, is Mercer Outsourcing (Australia) Pty Ltd (Mercer). A copy of Mercer's Privacy Policy is available at secure.superfacts.com/public/oursuperfund/Privacy.tpz.

The administrator for our DC division, including account-based pensions, is Colonial First State Investments Limited (CFS). CFS forms part of the Commonwealth Bank Group of companies (the Group) and the Group's Privacy Policy is available at commbank.com.au.

2. Your privacy is important to us

We know that how we collect, use, exchange and protect your information is important to you, and we value your trust. That's why protecting your information and being clear about what we do with it is a vital part of our relationship with you.

This privacy policy is for members and other beneficiaries of Commonwealth Bank Group Super.

Please note that during the course of our relationship with you, we may tell you more about how we handle your information. This could be when you complete an application or claim form, or when you receive terms and conditions or a Product Disclosure Statement. When you receive this further information, please consider it carefully.

Please also visit our website oursuperfund.com.au regularly as we update this policy from time to time.



Find out more or log in at
oursuperfund.com.au



Accumulate Plus & Retirement Access:
Call: **1800 023 928** 8am–7pm, Mon–Fri
Email: oursuperfund@cba.com.au
Post: GPO Box 4758, Sydney NSW 2001



Defined Benefits:
Call: **1800 135 970** 8am–7pm, Mon–Fri
Email: via oursuperfund.com.au/login
Post: GPO Box 4101, Melbourne VIC 3001

3. What information do we collect?

The trustee collects and holds personal information, including sensitive information, relevant to your super benefits as defined in the fund's trust deed and rules.

Information we collect from you

We collect personal information about you when you use our products or services, or deal with us in some way. This includes collecting information when you:

- contact us – for example, when you open an account, fill in an application or claim form, give us feedback or make a complaint
- use our products or services – for example, when you log into your account.
- visit our websites or use our mobile apps.

Information we collect from others

We collect information about you from others, such as service providers, employers or family members. For example, as your employer, the Bank may provide us with information about you in order to open an account for you, or if you apply for a disability benefit we may collect medical and lifestyle information from you or your health professionals.

We may collect information about you that is publicly available, e.g. from public registers or social media, or made available by third parties. Again, information we collect from others may be received and held by third party service providers.

The information we collect may include:

- information about your identity – including your name, address, date of birth, gender, marital status, contact details, occupation, job title and beneficiaries
- your Tax File Number or tax residency status
- health information – for example for insurance purposes
- financial and transaction information
- when you visit our websites or use our mobile apps – your location information, IP address and any third-party sites you access. For more information about how we do this, visit oursuperfund.com.au/cookies
- other personal information, such as details of your interactions with us.

Sensitive information

The Privacy Act protects your sensitive information, such as information about your ethnicity, religion, health or biometrics (e.g. iris scans, finger prints). If we need this information, we'll ask for your permission, except where otherwise allowed by law.

Sensitive information obtained by the trustee includes health information, e.g. where insurance cover is provided.

4. How do we use your information?

The main legislation affecting the administration of superannuation funds is the *Superannuation Industry (Supervision) Act 1993*. Under this Act, we need to request and hold certain information to enable your super benefits to be properly administered. There are similar obligations under the tax legislation and other legislation administered by the Australian Taxation Office.

We are careful about how we use your information. The information that we collect and hold in connection with the fund will be used principally for the purposes of managing the affairs of the fund and helping members and beneficiaries to maximise their super benefits.

We also use your information for other reasons, such as to better understand you and your needs. This may include providing you with information about other products and services that may help you understand and make decisions about your investment and retirement savings. This is subject to relevant restrictions under legislation, including the *Privacy Act 1988*, and the trust deed.

We collect, use and exchange your information so we can:

- establish or confirm your identity and assess applications for products and services
- administer your super account
- manage our relationship with you
- manage our risks and help identify and investigate illegal activity, such as fraud
- contact you, e.g. if we need to tell you something important
- conduct and improve our business and improve our member experience
- comply with our legal obligations and assist government and law enforcement agencies or regulators
- identify and tell you about other products or services that we think may be of interest to you.

We may also collect, use and exchange your information in other ways where permitted by law.

If you do not give us the personal information we request, we may not be able to properly administer your super benefits.

Exchanging member information within the Commonwealth Bank Group

As a corporate super fund, we have a relationship with the Bank as our sponsoring employer. Some of the information we hold about you will be exchanged with other Commonwealth Bank Group (the Group) entities for the purposes of managing the fund (the *Main Purpose*).

If you are a DB Pensioner we may provide information to the Bank about your pension. This may include information about the amount of pension you receive or how your pension is paid or information to assist the Bank in maintaining records of previous employees and/or their beneficiaries.

If you are an Accumulate Plus or Retirement Access member, and unless you opt out, some of the information we hold about you may also be exchanged for other specific purposes (the *Other Purposes*), such as allowing you to see your account balance through NetBank or the CommBank App, where you hold a Group product that provides a NetBank ID.

Information that we exchange with the Group for Other Purposes will, unless you opt out, be exchanged, stored and visible within other Group customer databases. All information stored in these databases is subject to the Group's Privacy Policy, which you can access via the 'Privacy' link at the bottom of the homepage of commbank.com.au.

Information in these databases exchanged for Other Purposes will, unless you opt out, be accessible to Group entities for purposes such as direct marketing or gathering or combining information to gain further customer insights.

If you do not want us to exchange member information that we hold about you with the Group for Other Purposes, you can opt out at any time by calling us or completing our *Request to opt out of/opt into NetBank* form, available from oursuperfund.com.au/forms.

Direct marketing

Direct marketing is the use and/or disclosure of personal information to communicate directly with you to promote other products and services. We will only do this to identify and tell you about other products and services that we think may be of interest to you. If you do not want to receive direct marketing from us, please contact us on the details provided at the bottom of page 1 or page 5.

Using data to give you better customer service

We're always working to improve our products and services and give you the best customer experience.

Improvements in technology enable super trustees, like us, to collect and use information to get a more integrated view of members and provide better products and services.

We may combine member information with information available from a wide variety of external sources, including, but not limited to, the census or Australian Bureau of Statistics data. We may then analyse the data in order to gain useful insights that can be used for any of the purposes mentioned in this section.

In addition, we may acquire data insights or related reports from others, e.g. to help us understand our members better. These reports are based on aggregated information and do not contain any information that identifies you.

Similarly, if we share our data with third parties that are unrelated to the trustee, e.g. researchers and ratings agencies, to allow them to better understand the fund, this data does not contain any information that identifies you.

5. Who do we share your information with?

Third parties

We may exchange your information with third parties where this is permitted by law or for any of the purposes mentioned in section 4.

Third parties include:

- the Group, including the Bank – refer to section 4 for more information
- our service providers, e.g. the fund's administrators, advisers, insurers or actuary
- those to whom we outsource certain functions, e.g. direct marketing, customer surveys, statement production and information technology support
- brokers, agents and advisers and persons acting on your behalf, e.g. guardians and persons holding power of attorney
- claims-related providers who help us with claims, such as healthcare professionals, assessors and investigators
- auditors, insurers and re-insurers
- employers or former employers
- government and law enforcement agencies or regulators
- entities established to help identify illegal activities and prevent fraud.

Under 16s and special needs

If you are under 16 or have special needs, we may share your information with your parent or legal guardian or any person appointed to manage your affairs.

Sending information overseas

From time to time, we or our service providers may send your information overseas, including to third parties who operate or hold data outside Australia. Where we do this, we endeavour to make sure that appropriate data handling and security arrangements are in place. Please note that Australian law may not apply to some of these entities.

We may also send information overseas to complete a particular transaction. Below is a list of countries where there may be recipients to whom we disclose personal information in the course administering your super:

- United Kingdom
- United States
- India
- New Zealand
- Bermuda
- Singapore
- Poland
- Malaysia
- Ireland.

Where we share your data with the Group, you can visit the Group's website at www.commbank.com.au/security-privacy/country-list.pdf for information on which countries the Group may send your information to.

6. Keeping your information safe

We store your hard-copy or electronic records in secure buildings and systems or offsite using trusted third parties. Here are some of the things we do to protect your information.

Staff education	We train and remind our staff of their obligations with regard to keeping your information safe and secure.
Secure handling and storage	When we send information overseas or use third parties that handle or store data, we endeavour to ensure that appropriate data handling and security arrangements are in place.
System security	When you log on to our websites, we encrypt data sent from your computer to our systems so no one else can access it. We have firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses accessing our systems. When we send your data electronically, we use dedicated secure networks or encryption. We limit access by requiring use of passwords.
Building security	We use a mix of alarms, cameras, guards and other controls in our buildings to prevent unauthorised access.
Destroying or de-identifying data when no longer required	We aim to keep personal information only for as long as we need it (e.g. to meet legal requirements or our internal needs). When we no longer need information, we take reasonable steps to destroy or de-identify it.

7. Accessing, updating and correcting your information

You can contact us and ask to view your information. If your information isn't correct or needs updating, let us know straight away.

Can you see what information we have?

You can ask for access to your personal information, e.g. what transactions you've made, by logging into your account online (if applicable) or by contacting us. Our contact details are at the bottom of page 1 or page 5.

Is there a fee?

There is no fee for making the initial request but in some cases there may be an access charge to cover the time we spend locating, compiling and explaining the information you ask for.

If there is an access charge, we'll give you an estimate up front and confirm that you'd like us to proceed. Generally, the access charge is based on an hourly rate plus any photocopying costs or other out-of-pocket expenses. You'll need to make the payment before we start.

How long does it take to gain access to my information?

We try to make your information available within 30 days of your request. Before we give you the information, we'll need to confirm your identity.

Can we refuse to give you access?

In certain circumstances we're allowed to deny your request, or limit the access we provide, e.g. we might not provide you with access to commercially sensitive information. Whatever the outcome, we'll write to you explaining our decision.

Updating your information

It's important that we have your correct details, such as your current home and email address and phone number. You can check or update your information by logging into your account online (if applicable) or by contacting us. Our contact details are at the bottom of page 1 or page 5.

Can you correct or update your information?

You can ask us to correct or update any information we hold, or have provided to others, by contacting us using the details in at the bottom of page 1 or page 5.

If the information that is corrected is information we have provided to others, you can ask us to notify them of the correction. We don't charge a fee for these requests.

If we're able to correct your information, we'll inform you when the process is complete.

What if we believe the information is correct?

If we don't think the information needs correcting, we'll write to you to let you know why. You can ask us to include a statement with the information that says you believe it's inaccurate, incomplete, misleading or out-of-date. We will take reasonable steps to comply with such a request.

8. Making a privacy complaint

If you have a concern or complaint about your privacy, let us know and we'll try to fix the matter. If you're not satisfied with how we handle your complaint, there are other things you can do.

How can you make a complaint?

If you have a concern about your privacy, you have a right to make a complaint and we'll do everything we can to put matters right. If you have a complaint about the handling of your personal information, please contact us using the details at the bottom of page 1 or page 5.

How we manage a complaint

If you lodge a complaint with us in relation to a privacy issue, we will follow our normal complaints management process as outlined in our *Enquiries and complaints* fact sheet available from our website.

We will endeavour to ensure that your complaint is resolved in a timely and appropriate manner. However, superannuation law allows the trustee to take up to 90 days to deal with a complaint if necessary.

If the complaint is valid, we will take steps to ensure that any interference with your privacy is discontinued.

If you wish to escalate a complaint

If you are not happy with the way a privacy-related complaint has been managed or with the outcome, you can escalate your complaint to the Office of the Australian Information Commissioner (OAIC).

The OAIC is a government agency that can investigate privacy complaints from individuals about organisations covered by the Privacy Act, such as the trustee.

Generally, you must escalate a privacy-related complaint to the OAIC within 12 months of becoming aware of the issue.

To find out whether the OAIC can handle your complaint and for information regarding requirements and time limits, you should contact the OAIC:

- Post to GPO Box 5218, Sydney NSW 2001
- Phone 1300 363 992
- Email enquiries@oaic.gov.au
- Visit www.oaic.gov.au/privacy/making-a-privacy-complaint

9. We're here to help

For more information about privacy, you can contact us using the details at the bottom of this page.



Find out more or log in at oursuperfund.com.au



Accumulate Plus & Retirement Access:
Call: **1800 023 928** 8am–7pm, Mon–Fri
Email: oursuperfund@cba.com.au
Post: GPO Box 4758, Sydney NSW 2001



Defined Benefits:
Call: **1800 135 970** 8am–7pm, Mon–Fri
Email: via oursuperfund.com.au/login
Post: GPO Box 4101, Melbourne VIC 3001