

Harwood Nominees Pty Limited
ABN 70 001 216 208 AFSL 240614

as trustee for the Harwood Superannuation Fund
ABN 46 182 687 345 SFN 111 024

Harwood Superannuation Fund

PRIVACY POLICY STATEMENT

(adopted 26 March 2004)

(updated 15 February 2005)

(updated 2 March 2007)

(updated 4 May 2007)

(updated ABN & CEMEX references Sept. 2008)

(updated Holcim references Feb 2010)

(updated 21 March 2011)

(updated 12 January 2012 to reflect change of name to Harwood Super)

Harwood Superannuation Fund

Privacy Policy

The National Privacy Principles require the Trustee of the Harwood Superannuation Fund to set out in a document its policies on management of personal information. The document must be made available to anyone who asks for it.

Contact details of Harwood Superannuation Fund

- **Trustee:** Harwood Nominees Pty Limited
 - **Privacy Officer:** Greg Laws
 - **Address:** Triniti 3, Level 5, 39 Delhi Road
NORTH RYDE, New South Wales, 2113 or
P O Box 155, NORTH RYDE, New South Wales, 2113
 - **Telephone:** (02) 9235 8520
 - **Facsimile:** (02) 8362 9027
 - **Harwood Super** **website:** www.harwoodsuper.com.au
email: info@harwoodsuper.com.au
 - **Holcim Super** **website:** www.holcimsuper.com.au
email: info@holcimsuper.com.au
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General statement of information handling policies

The Fund recognises how important it is to you to know that any information you provide to us will be handled properly.

The Fund does everything it can to maintain the highest standards in dealing with personal information, which it holds for you and other members. Its staff are employed on the basis that they:

- understand these standards; and
- take all reasonable steps to meet them.

Under law your rights to privacy are also protected. The Privacy Act and general law place strict requirements on the Fund to treat any information you give us as confidential.

Collection

What information we collect

The information collected from you will include, but is not limited to, the following:

- your name and contact details,
- your date of birth and sex,

- your email address,
- the date your Fund membership commenced,
- your salary or wage,
- your contribution selection and deduction instructions,
- your investment choice selection,
- your Tax File Number (if provided),
- your application for death and disability cover (including details of your medical history),
- your instructions regarding retained benefits and spouse contributions; and
- your employer.

Why we collect the information

The information is used to establish your member account in the Fund, to process your contribution and investment instructions and to provide you with Fund benefits.

We may also use the information for the purposes of:

- your death and disablement benefits arrangements,
- administering your investment choice,
- managing assets for the purposes of implementing your investment choice,
- processing the payment of your benefits and
- complying with applicable laws and regulations.

Where we collect the information from

Where practicable, the information is collected from you or your employer. In some cases, information about spouse members is collected from existing members of the Fund. However, if you are a new member, you will also complete a Membership Application form.

If you wish to take out optional death or disablement cover, or your basic cover is over \$750,000, or you are transferring from Inactive to Active membership, or you are a Retained Member or a Spouse Member applying for death only insured cover, you will need to sign the consent authority contained in the Full Personal Statement and Declaration of Health which the Fund will send to you for completion. For further information on insurance, please refer to the fund's Product Disclosure Statements.

If you apply for a total and permanent disablement benefit from the Fund, your consent is required before the Fund can seek health and related information about you from third parties.

Keeping information up to date

If you are an existing member, it is important that you keep the Fund up to date with any changes to your personal circumstances (such as change of name or address).

False or incomplete information

The Fund reserves the right to impose restrictions on your benefits if you or your employer do not provide the information required by the Fund or if it is incorrect.

Disclosures

Disclosure of personal information

The Fund discloses information to the following organisations or individuals when and to the extent necessary to administer the Fund and to comply with applicable laws and regulations:

- the Australian Taxation Office and other Government authorities,
- your employer and its subsidiaries from time to time (except in the case of health or other sensitive information where your consent would be sought),
- the Fund's professional advisers (including legal and accounting firms, actuaries, auditors, consultants and other advisers),
- superannuation funds or arrangements to which your benefit is to be transferred or rolled over (including the administrator of that fund or arrangement),
- third party service providers the trustee may engage to provide administration, technology, auditing, mailing, printing services, or group life insurance,
- your spouse or former spouse when required by law,
- medical practitioners, rehabilitation advisers, vocational assessors and other professionals (including your legal advisers) if you apply for a disablement benefit or need to provide an ***Application for Insurance*** form in respect of any death or disablement insured cover; and
- in the event of your death, your legal personal representative, any person who may be entitled to receive the death benefit, any person whom the Fund wishes to contact in relation to the processing of the death benefit, and their advisers.

The Fund does not provide information about you to third parties for direct marketing purposes.

Retention policies

The security of information is a high priority to us.

When the Fund has collected information about you:

- it cannot be accessed or modified by any one else except when and to the extent required for the proper administration of the Fund, and
- the Fund takes all reasonable steps to ensure that the information is stored securely, both in electronic and physical forms.

The Fund has its own software system (separate from that belonging to your employer) to maintain administrative records. It has arrangements for complete system recovery if there is disruption to its processing or record keeping, with full system backups each night that are stored off site.

The Fund also takes all reasonable steps to destroy or de-identify information held about you if it is no longer needed. Under superannuation law, some records need to be held for a minimum of 10 years. As a general rule, the Fund keeps all information for that period to ensure that it can respond to queries even after you have left the Fund. However, your Tax File Number will be destroyed as soon as is practicable after you leave the Fund.

Access and correction

You may access the information which the Fund holds about you at any time. If you would like to know what information we hold about you, please contact the Fund. You may be required to put your request in writing for security reasons.

In certain circumstances, the Fund will only disclose particular information to a third party. For example, it may choose to provide health information to your General Practitioner rather than directly to you.

The Fund is not required to give access if:

- it would pose a serious and imminent threat to the life or health of any individual,
- it would have an unreasonable impact upon the privacy of other individuals,
- the request for access is frivolous or vexatious,
- the information relates to existing or anticipated legal proceedings between you and the Fund,
- it could prejudice negotiations between you and the Fund on a particular matter, or
- providing access would be unlawful, prejudice or compromise the operations of a law enforcement body, or compromise the security of Australia.

Where the Fund is unable to provide access, it will provide reasons for the denial of access.

The Fund reserves the right to impose charges for providing access to information but will not impose a charge simply for lodging a request.

The Fund will try to ensure that all information collected, used or disclosed about you is accurate, complete and up-to-date. However, the accuracy of the information will depend in part upon the information which you and your employer provide to the Fund.

If you discover that there is an error in the information held about you or certain information is missing, please notify the Fund and we will try to correct or add the information as soon as possible.

You are encouraged to keep the Fund up to date with any changes to your personal circumstances (such as change of name or address).

If you would like to talk to the Fund about access or correction, please contact the Fund's Privacy Officer. Contact details are set out at the start of this Privacy Policy Statement.

Website

The Fund may collect information from you via the websites. Information collected via the websites will be stored securely by authorised third parties and will only be accessed by authorised personnel. Information held about you on the websites may be accessed by selecting the "Your Account" menu item.

To provide information via the websites, or to access, correct or update information held about you on the websites, you will need to use your password. It is important that you keep your password secure at all times.

Unfortunately, no data transmission over the internet can be guaranteed to be 100% secure. However, we strive to protect your information from misuse, loss and unauthorised access. Once we receive your transmission, we will use all reasonable endeavours to ensure its security.

Disputes

If you believe that the Fund has breached your privacy rights in any way, or you would like to discuss any issues about our privacy policy, please contact the Fund's Privacy Officer. Contact details are set out at the start of this Privacy Policy Statement.

The Fund will try to satisfy any questions that you have and correct any errors on our part. The Privacy Officer will attend to your questions promptly, with written response forwarded within three working days of receipt.

If you are not satisfied with the Fund's answer to your questions or concerns, please do not hesitate to write to the Fund Secretary at the address set out at the start of this Privacy Policy Statement. The Fund Secretary will investigate the matter on behalf of the Trustee.

Issues which are not able to be resolved through this channel will be referred to the full Trustee Board, which also receives regular reports on the general nature of the questions it has received relating to privacy. The Fund expects that this process will deal with your concerns satisfactorily.

If you still have concerns, you have the right to make a complaint to the Australian Information Commissioner. The Australian Information Commissioner may be contacted on:

Telephone: 1300 363 992
Post: GPO Box 5218
Sydney NSW 2001
E-mail: enquiries@oaic.gov.au
