

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

PRIVACY COMPLAINTS RESOLUTION PROCEDURES

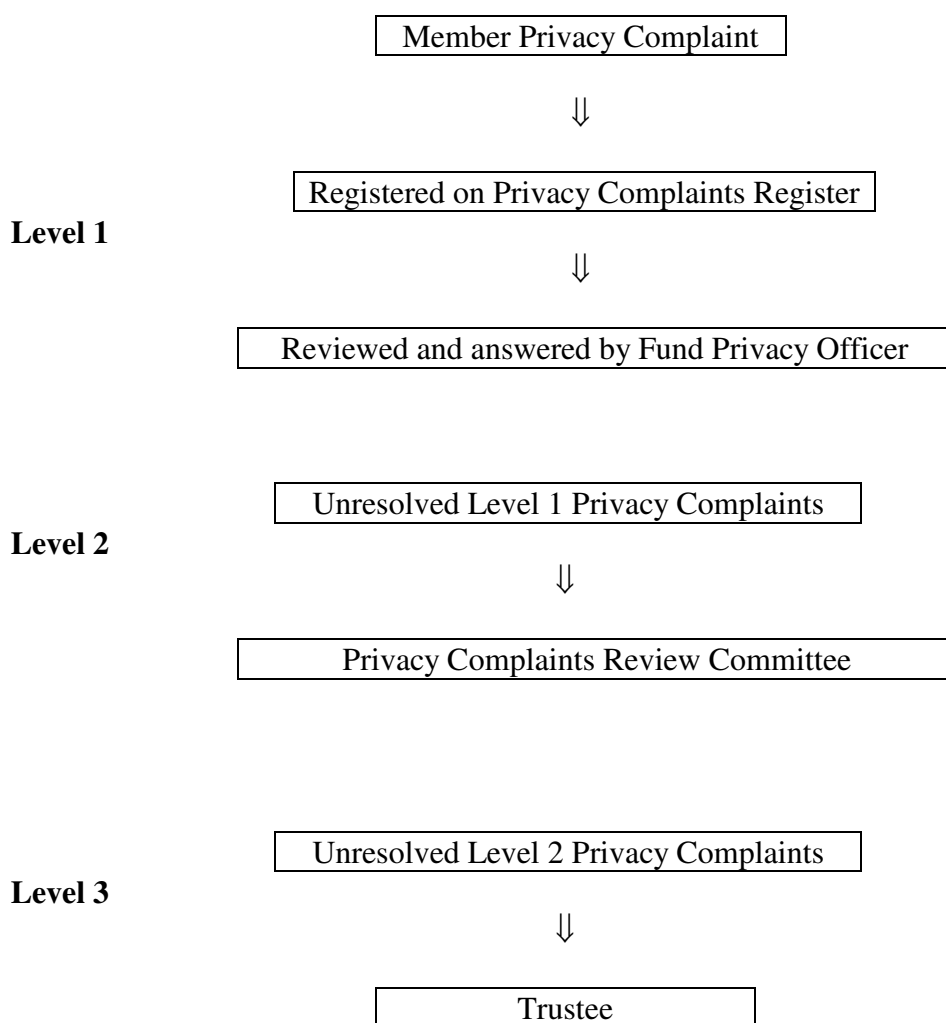
OVERVIEW

The Privacy Amendment (Private Sector) Act 2000 came into effect on 21 December 2001. It is a requirement of the privacy legislation that superannuation funds provide a formal complaint mechanism for members.

This document sets out the Harwood Superannuation Fund Privacy Complaints Resolution Procedures.

STRUCTURE

The Harwood Superannuation Fund Privacy Complaints Resolution Procedures consist of a three tiered structure as follows:



Level 1

The Harwood Superannuation Fund (“Fund”) has three Plan Employers: CSR Limited (“CSR”), Sucrogen Limited (“Sucrogen”) and Holcim (Australia) Holdings Pty Ltd (“Holcim”).

The Fund is made up of five divisions:

- **Division One** comprises four plans:
 - the Harwood Pensioner DBD Plan (Plan Employer – CSR and Sucrogen);
 - the CSR DBD Plan (Plan Employer – CSR);
 - the Sucrogen DBD Plan (Plan Employer – Sucrogen); and
 - the Holcim Super DBD Plan (Plan Employer – Holcim).
- **Division Two and Three** comprises two plans:
 - the Harwood Super Accumulation Plan (“Harwood Super”) (Plan Employers – CSR and Sucrogen); and
 - the Holcim Super Accumulation Plan (“Holcim Super”) (Plan Employer – Holcim).
- **Division Four** an Allocated Pension/Transition to Retirement Allocated Pension Division.
- **Division Five** is MonierPGH Super (Plan Employer – CSR).

There is an Inquiry Line attended on a rostered basis by Customer Services staff on working days between the hours of 8.30 am and 5.30 pm (Sydney time). All staff attending the Inquiry Line have sufficient experience and knowledge to answer basic member privacy related complaints. The Inquiry Line numbers are:

- (02) 9235 8533 (Harwood Super and MonierPGH Super); and
- (02) 9235 8566 (Holcim Super).

All privacy related complaints received on the Inquiry Line are referred to the Privacy Officer. All complaints are recorded on the Privacy Complaints Register and formally acknowledged by the Privacy Officer.

The Privacy Officer will review the Complaints Register at least weekly to ensure that all complaints have been resolved. The Privacy Officer will also determine which complaints require further action either personally or by another senior staff member of the Fund.

The quarterly Privacy Complaints Register is tabled at the Harwood Nominees Pty Limited board meetings.

Any privacy related complaints which remain unresolved at *Level 1* are automatically forwarded to *Level 2*.

Level 2

The Privacy Officer has responsibility to ensure that any unresolved privacy related complaints are referred to the Privacy Complaints Review Committee.

This Committee comprises the Chief Executive Officer/Fund Secretary (Chair) and the Privacy Officer. The Compliance Officer is the Committee secretary. This Committee will meet as often as necessary, but at least quarterly, to review any unresolved *Level 1* complaints. Minutes of the Privacy Review Committee meetings are tabled at the Harwood Nominees Pty Limited board meetings.

Any decisions made by this Committee will be advised to the member in writing by the Privacy Officer. Any privacy related complaints which remain unresolved at *Level 2* will automatically be referred to *Level 3*.

Level 3

The business of trustee meetings includes the consideration of any privacy related complaints not resolved at *Level 1* or *Level 2*, together with (on a quarterly basis), a report on privacy related inquiries and complaints resolved at *Level 1* or *Level 2*.

Any decision made by the trustee concerning a privacy related complaint will be advised in writing to the member by the Privacy Officer.

CONTACT DETAILS

The Privacy Officer may be contacted by:

Writing to: Privacy Officer
Harwood Superannuation Fund
PO Box 155
NORTH RYDE NSW 2113
Phoning: (02) 9235 8533
Faxing to: (02) 8362 9027

CONCLUSION

These procedures are in place to ensure a timely and satisfactory response to any privacy related member complaints that may arise. Whilst there is no legislated time frame for dealing with privacy related complaints, it is intended that complaints must be considered and properly dealt with within a 90-day period.

Should a member remain dissatisfied at the conclusion of the above procedures, he or she may refer their complaint to the Australian Information Commissioner:

Email: enquiries@oaic.gov.au
Phone: 1300 363 992
Mail: GPO Box 5218
Sydney NSW 2001