

# LUCRF Super's *Privacy Policy*



**LUCRFsuper**

Australia's first industry fund



# Privacy Policy

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## About

The policy will refer to the Trustee, L.U.C.R.F Pty Ltd and Labour Union Co-operative Retirement Fund Pty Ltd (LUCRF Super) as “we”, “our”, or “us”.

Your confidentiality is important to us. We manage your privacy by following the Australian Privacy Principles under the Privacy Act 1988 (Cth) (“Privacy Act”).

Our Privacy Policy explains how we collect, hold, use, share and protect your personal and sensitive information. It also explains how you can access and correct your personal information or make a complaint.

## What is personal and sensitive information?

Personal information includes information or an opinion that identifies you or enables us to reasonably identify you. Sensitive information is personal information about your health.

## Kinds of personal information collected and held

We keep and hold your personal information to provide you with our products and services. The type of personal information collected and held will depend on the service or product provided. We generally collect and hold the following personal information about you:

- Full name
- Gender
- Tax File Number (TFN)
- Contact details
- Date of birth
- Employment details such as any contributions made to your account, name of your employer and the duration of employment

## We may also ask to collect and hold the following personal identification information about you:

- Photographs, signatures, identification document numbers, place of birth and other information collected during the process of identifying you
- Details about your nominated financial institutions
- Reference numbers (CRN) from the Department of Human Services
- Member numbers from other super funds or financial institutions
- An Inland Revenue Department (IRD) number if you request to transfer your superannuation benefits to or from New Zealand
- If you are a self-employed or a sole trader, information about your business

- When considering a death benefit claim, we may obtain personal information about your potential dependants or beneficiaries and other information relating to the claim
- Financial information such as your assets, liabilities, income, expenditure, insurance cover and superannuation
- Risk tolerance when you complete the Risk Profile Questionnaire
- Social security information and your family status
- Any complaint details

In certain circumstances, we may collect and store your sensitive information, such as your health for insurance purposes, any membership of professional associations and trade unions, and your nationality.

We are authorised to request and collect your TFN in accordance with the Superannuation Industry (Supervision) Act 1993. Providing your TFN allows us to establish and administer your LUCRF account, report information to the ATO, locate and consolidate any lost super.

## How personal information is collected and held

### Collect

We collect your personal information directly from you and your employer. We may also gather your personal information from other superannuation funds, the Australian Taxation Office, the Department of Human Services and the Department of Immigration and Border Security.

If you provide us with personal information about your beneficiaries, you should let them know about it.

We may also collect some of your health information from our insurer, your medical practitioner and legal advisers if you consent to the collection.

We may also collect your personal information from a third party. The third party must inform you about disclosing your personal information to us.

We collect personal information via paper, digitally or verbally through our contact centre, our secure online account facility and our protected internal administration system.

### Hold

We hold most of your personal information digitally on our secure servers in Australia. We may hold your telephone discussions with us unless you choose not to have it recorded.

We send personal information collected in hard copy to an external archiving organisation that provides protected storage of these documents.

We adopt a range of security measures to monitor and protect your personal information. To protect your personal information, we limit access to our offices, system networks and administration networks only to authorised staff issued with individual security passes and password access. We also adopt a clean desk policy, segregate employee duties, conduct annual system vulnerability testing, audit security controls and provide security awareness training to staff.

## The purpose of collecting personal information

We collect, hold, use and disclose your personal information (which may include sensitive information) to:

- Establish and manage your superannuation or pension account
- Administer the Gateway and Clearing House Service
- Investigate and resolve any complaints or queries you may have
- Meet our obligations under superannuation, taxation and other relevant Australian laws
- Identify you under anti-money laundering law
- Conduct market research to develop and improve products and services
- Let you know about products and services available to you
- Provide you with Members Online and the LUCRF Super app
- Consolidate any superannuation accounts you may have elsewhere into LUCRF Super
- Collect outstanding employer contributions
- Direct marketing and electronic communication
- Administer any family law superannuation split under Family Law and Regulations
- Provide personal financial advice
- Assess your insurance entitlement such as death, income protection or Death and Total and Permanent Disablement (TPD) insurance
- Verify personal identification documents
- Validate your visa status

We may also collect, hold, use and disclose your personal information for our direct marketing, educational or research purposes. If you do not wish to receive our educational, marketing or promotional material, please let us know.

We will seek to obtain informed consent for any images or video footage taken of you for promotional purposes.

If we receive unsolicited personal information about you, we will within a reasonable period after receipt of this information, determine whether or not we could have collected the information under the Privacy Act. If we do not require the information, we will, as soon as practicable but only if it is lawful and reasonable to do so, destroy the information or ensure that the information is de-identified.

We may also use or disclose your personal information if a permitted situation exists under the Privacy law such as, preventing or lessening a serious threat to life or safety of an individual or to assist the location of a missing person.

## Website and mobile app analytics

We use cookies to monitor the impact of user transactions on our IT systems. The information collected during this process does not include personal identifiers. We use this information to improve system efficiencies and performance, and we may share this information with our IT system providers for development and maintenance purposes.

We use Google Analytics on our website and mobile app to collect information about how you use our services and to provide you with information about services we think will interest you. This information is provided to us as aggregated data and does not include personal information.

Google Analytics uses cookies to collect information about you, your device, your location, websites you visit and the apps you download. Google shares information it collects with affiliates within the Google group of companies and other third parties. The manner in which Google collects, stores and discloses information is detailed in the Google Privacy Policy.

You can manage the use of cookies within your internet browser or mobile device settings. Google also provides a Google Analytics opt-out browser add-on; visit Google's Ads Setting or Add Settings for mobile apps for more information.

### Social media

We use social media such as Twitter, Facebook and LinkedIn to keep members and associated organisations informed about our products and services.

We discourage members from providing personal information to us on social media and we will never ask you to provide your personal details on a public forum or unsecure site. Social media sites also use cookies to collect data; the collection, storage and disclosure of personal information is subject to the privacy policy of the site provider.

### Cookies

Cookies are a small text file attached to your web browser that can track your internet activity. The information collected varies depending on the sites you visit and the type of cookies stored for that site. The information collected by cookies can include personal information.

Your physical location can also be tracked through cookies and mobile phone apps to deliver you demographic based advertising. Marketing and advertising companies often share information collected through these activities with other companies.

You can manage or block cookies on your internet browser under the options or settings menu on your internet browser. You may be able to disable location tracking devices or other permissions on your phone or within the settings of certain apps. This may impact on the functionality, performance and service of apps.

## If you withhold some of your personal information from us

If you do not provide your full name, residential address and date of birth we may not be able to establish and administer your superannuation or pension account.

If you choose not to give us some of your personal information required to provide you with our products and services, we may not be able to provide some or all of those products and services to you.

You do not have to provide your TFN to us, however if you do not, you may be paying more tax on contributions made to your account in the year. You will also not be able to make personal contributions to your super account. If you choose to quote your TFN, it will be easier to keep track of your super in the future.

## Anonymity and pseudonymity

You have the option of not identifying yourself, or of using a pseudonym should you wish to provide feedback or make a general enquiry about our products and services. However, if you have specific questions about your superannuation or pension account, we will require you to identify yourself.

## Providing information to other organisations

The information we disclose to other organisations about you will depend on the products or services that we provide you. The types of organisations or people that we may provide your personal information to may include:

- Our external service providers such as mailing organisations, our internal administration system provider, financial advice support technology and other technology service providers;
- Archiving organisations that provide protected storage to maintain documents and digital information;
- Any person's nominated by you in writing;
- Other superannuation funds to which your benefits may be transferred or rolled over to;
- Auditors, regulators and legal advisors in regarding the Fund's legal and contractual obligations;
- Our Insurer who provides insurance benefits;
- External complaint handling agencies;
- Certain person/s as required by the Family Law Act;
- Government bodies including Law Enforcement agencies;
- Agencies providing data matching, washing or enhancement;
- Other financial services organisations such as banks, superannuation funds, custodians and fund managers; and
- External Research institutions that are conducting random opinion surveys of our members.

## Direct marketing

We use direct marketing to contact members for the purposes of promoting superannuation products and services, or other goods and services we think may be of interest to you. We engage third party service providers to assist us with delivering direct marketing via various channels including but not limited to post, email, sms and the LUCRF Super mobile phone app.

To facilitate the delivery of direct marketing we provide third parties with your contact details. We take all reasonable steps to ensure that our service providers treat your personal information with the same level of privacy and protection as we do.

You can opt out of direct marketing by contacting the Trustee or using the 'opt out' or 'unsubscribe' functions provided in communications.

## Contribution collection agencies & Information verification services

We may provide your personal information to external agencies to help us recover your outstanding superannuation contributions and to ensure your contact details are up to date. We also use online verification services for the purposes of validating proof of identity documentation and to validate your visa status if you claim your superannuation after departing Australia.

## Updating and accessing personal information

You may request a copy of your personal information. You may make amendments to this information if you believe it to be inaccurate. The Privacy law provides some exceptions to this rule however, and if any one or all of these arise, a denial with accompanying explanation will be issued to you. If you wish to update your personal information or obtain a copy of your personal information, please call us and speak to our representatives. You will be required to answer a series of questions to verify your identity before we can share information about your account.

## Making a complaint

If you believe that we have breached your privacy rights, or have a privacy complaint please contact us by:

**Phone:** 1300 130 780

**Email:** [complaints@lucrf.com.au](mailto:complaints@lucrf.com.au)

**Post:** The Privacy Officer,  
LUCRF Super  
PO Box 211  
North Melbourne, VIC 3051

We will review and respond within a reasonable time after we receive your complaint. If you are not satisfied with our resolution, you may contact the Australian Information Commissioner (OAIC) using the following:

**Phone:** 1300 363 992 or + 61 2 9284 9749  
if you are calling from outside Australia

**Email:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

**Online:** Lodge a form via  
[www.oaic.gov.au/privacy/making-a-privacy-complaint](http://www.oaic.gov.au/privacy/making-a-privacy-complaint)

**Post:** The Office of the Australian Information Commissioner  
GPO Box 5218  
Sydney, NSW 2001

For further information about lodging a complaint or the Privacy Act, please visit the Office of the Australian Information Commissioner's website.

Contact us

**1300 130 780**  
**[lucrf.com.au](http://lucrf.com.au)**



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