

## Privacy

Super Equity Link is committed to protecting your personal information. This Privacy Policy sets out the details relating to your data relationship with Super Equity Link and applies to services and interactions with Super Equity Link. A copy of this policy is available on the Website or you can request a copy by contacting our Customer Service team.

This Privacy Policy applies to products and services offered by us, and by using our services you agree and consent to the collection, use and disclosure of your information in connection with providing you our services.

### 1. Interpretation

Where the context allows, in this document:

- (a) A reference to the Website means Super Equity Link's website at <https://superequitylink.com.au/> and all its contents.
- (b) A reference to Super Equity Link means Super Equity Link Pty Ltd and its related bodies corporate, and includes all officers, agents, employees, suppliers and other contractors of Super Equity Link.
- (c) A reference to you means the person accessing the Website and includes all his or her principals, employers, partners, officers, agents and employees.

### 2. What information we collect

- (a) The personal information we collect about you depends on the dealings you have with us. Personal Information includes information about an individual who is reasonably identifiable.
- (b) The types of personal information we collect and use depends on your interaction and transactions with us, including:
  - (i) your name, address, date of birth and other personal details and identifiers;
  - (ii) your general health and welfare information, such as whether you smoke, drink or have medical conditions;
  - (iii) your financial situation, including assets and liabilities, credit history, income and expenditures, type of work and other relevant details;
  - (iv) your household information, including information about household size, your spouse and dependents;
  - (v) your superannuation details, including the details of big super accounts that you may have and the amount they hold on your behalf; and

- (vi) details of your communications with professionals who assist you, including your lawyer, accountant and broker.

### **3. How we collect the information**

- (a) The information will be collected through a number of means, including:
  - (i) phone calls with our consultants;
  - (ii) when you attend our office;
  - (iii) face to face meetings at our office or other locations;
  - (iv) email and other correspondences, either between you and us, or with other professionals handling your matters; and
  - (v) communications through digital meeting and communications platforms such as Zoom, WhatsApp and Microsoft Teams.
- (b) We may monitor and record your communications with us for security, dispute resolution, and training purposes.
- (c) We may operate video and audio surveillance devices in our premises.

### **4. Collection of personal information from third parties**

- (a) We may also collect personal information from third parties including:
  - (i) public sources;
  - (ii) information service providers; and
  - (iii) anyone authorised to act on your behalf.
- (b) You can help us keep your information up to date, by letting us know about changes to your details.

### **5. Use of Cookies**

- (a) Information is automatically collected through your use of:
  - (i) the Website;
  - (ii) our affiliates' websites and apps;
  - (iii) electronic communications,through cookies.
- (b) Cookies are small text files that websites or apps may place on your computer or device.

- (c) Generally, cookies are used to recognise repeat users of websites and remember user preferences.
- (d) We may collect this information both anonymously and in relation to user accounts.
- (e) Cookies are also used to allow the website to gain statistical information about your usage behaviour and aggregate data to allow us to customise a user's experience on the Website.
- (f) The information is used and disclosed by us for purposes including statistical analysis and to assist us to improve the functionality and usability of the website and our apps.
- (g) The hyperlink you created must not portray Super Equity Link, the projects or the Website in a misleading, derogatory or offensive manner.
- (h) Similarly, when you use any apps from Super Equity Link, we may periodically collect and use technical data and related information (including technical information about your mobile device and system preferences), to facilitate the provision of software updates, software support and other services related to the apps.
- (i) We may also make use of third parties who use cookies to serve ads to you based on your past visits and use of our Website. This allow us to notify you of products or offers which we think you might be of interest to you. You can switch off cookies by adjusting the settings on your web browser.

## **6. Why we collect personal information**

- (a) We collect your personal information to provide, administer, improve and personalise our products and services, and to support our business functions, including:
  - (i) to provide you with products and services (or assist you to locate the right product or services) including those associated with self-managed superannuation and property investments opportunities;
  - (ii) where a person logs onto your account by providing your username and password, to be solely responsible for any action taken or omitted by that person whilst that person is logged into your account including, but not limited to, placement of orders and the authorisation of payments, whether or not that person is actually authorised to access your account;
  - (iii) to improve our service operations to enhance your customer experience;
  - (iv) to manage and work with our service providers to fulfil your request for products and services such as processing transactions and payments, delivering products and services;

- (v) to register and service your account, including your online account and keeping your information up-to-date, and verifying your identity;
  - (vi) promoting and communicating our products and services through direct marketing, events and competitions, public relations and social media;
  - (vii) to communicate with you and perform research and statistical analysis, such as customer satisfaction and product and service improvement purposes, tailor products and promotional offers to you, usage behaviour and user experience for online and digital platforms to improve functionality and usability;
  - (viii) matching information we collect against other information held by third parties, partners and sellers that you have consented to share your information with;
  - (ix) to conduct investigative, fraud and loss prevention activities to protect our interests including protection of our offices, staff, customers, suppliers and merchandise (including theft and fraud prevention);
  - (x) to respond to your query, feedback or concerns;
  - (xi) responding to and interacting with regulatory bodies and relevant government agencies; and
  - (xii) general planning and administration, and as other required or permitted by law.
- (b) We may also collect, hold, use and disclose personal information for other purposes explained at the time of collection or which are required or authorised by or under law, and for which you have provided consent.

## **7. Direct marketing, tech advertising and opting out**

- (a) By providing your address, email address and contact number to us, you consent to us contacting you for the purposes set out above.
- (b) We may send this information in a variety of ways, including by mail, email, social media, SMS, MMS, telephone and via our apps.
- (c) If we send you direct marketing or send you electronic marketing messages based on your consent or as otherwise permitted by applicable law, you may, at any time, withdraw your consent or opt-out by
  - (i) contacting our Customer Service team on 1300 521 171; or
  - (ii) using the unsubscribe facility that we include in our electronic messages (eg email, SMS or MMS) to opt out of receiving those messages.

## 8. How we disclose your personal information

We work with a number of suppliers and professionals that provide us and you with services to fulfil your request or carry out specific functions on our behalf, including:

- (a) contracted or approved third party service providers or professionals to provide you with products or services requested by you or may be of interest to you, to process your payment, to communicate offers and promotions to you, and for product development and product, service and market research;
- (b) our suppliers and service providers working in the superannuation or property industries;
- (c) approved technology services including application and systems, cloud computing facilities, development and technical support, processing, storing, hosting, research and to analyse data;
- (d) business advisors, including lawyers, accountants, brokers, insurance, recruitment advisors and agencies, auditors or other professional service providers to the extent reasonably required;
- (e) regulatory, investigative or government bodies to comply with applicable laws or respond to valid legal process such as a search warrant, a court order or a subpoena and fraud management.

## 9. Protection of personal information

- (a) Personal information we hold can be in electronic or hard copy form. Any trusted service provider must observe and meet our information security requirements to minimise the risk of unauthorised access to, and loss, misuse or unapproved alteration of, personal information.
- (b) In addition we have a number of security controls in place and use a range of resources, process and technology controls to protect your personal information. For an example all Team Members are required and bound by internal information security policies including limiting and controlling access to systems that hold personal information.
- (c) While we endeavour to protect the personal information of users of our website, we cannot guarantee the security of information you disclose online. You disclose that information at your own risk. You should be aware that no method of transmission over the Internet or method of electronic storage is 100% secure.
- (d) You can also help protect your personal information by keeping your account details confidential, access is limited and encourage you to use a unique and strong password, limit access to your computer and log out after use. If you become aware of unauthorised access, please let us know as soon as practicable.

## **10. Access and Correction**

### **10.1. Access.**

- (a) If you wish to access to personal information we hold about you, please contact our Privacy Officer.
- (b) We will generally provide you with access to your personal information subject to some exceptions permitted by law.
- (c) When making an access request, please provide as much detail as you can about the particular information you seek, in order to help us retrieve the information. We may ask you to verify your identity before proceeding with any request you make, this includes providing us satisfactory proof of identity as determined by us. If you have authorised a third party to submit a request on your behalf, we will ask them to prove they have your permission to act or will contact you directly to seek your permission.
- (d) We may charge a reasonable fee to cover our reasonable costs of locating the information and providing it to you.

### **10.2. Correction**

- (a) If you ask us to correct personal information that we hold about you, or if we are satisfied that the personal information we hold is inaccurate, out of date, incomplete, irrelevant or misleading, we will take reasonable steps to correct that information to ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.
- (b) If we correct personal information about you, and we have previously disclosed that information to another agency or organisation that is subject to the Privacy Act, you may ask us to notify that other entity. If so, we will take reasonable steps to do so, unless this would be impracticable or unlawful.
- (c) You should ensure that all personal information submitted to us is complete, accurate, true and correct. Failure on your part to do so may result in our inability to provide you with the products and services you have requested.
- (d) A record of the changes made to your personal information may be noted in your account or filing. You acknowledge that there may be circumstances where we are entitled to assume such accuracy and completeness and reserves the right to not correct personal information, where permitted under relevant laws.

## **11. Complaints or Questions**

- (a) If you would like further information about how we manage your personal information, or if you have any queries relating to our Privacy Policy, or wish to lodge a complaint in relation to an alleged breach of the Privacy Act, please contact our Privacy Officer by email to the Privacy Officer, at [legal@superequitylink.com.au](mailto:legal@superequitylink.com.au).

- (b) We may ask you to submit your complaint in writing. We may discuss and share your complaint with our staff and our service providers and others as required and appropriate.
- (c) All complaints received by the Privacy Officer will be dealt with fairly and in a timely manner considering all the circumstances of the complaint. In most cases, we expect that complaints will be investigated and a response generally provided within 30 days of receipt of the complaint. If the matter is more complex and our investigation may take longer, we will contact you and advise you of this.

## **12. Update to this policy**

- (a) We may amend this Privacy Policy from time to time without notice.
- (b) You should check this page regularly to take notice of any changes.
- (c) The current version will be posted on our Website and a copy may be obtained by contacting our Customer Service team.

## **13. General**

- (a) This Privacy Policy and your use of our services including the Website is governed in all respects by the laws of New South Wales, Australia and you agree to submit to the exclusive jurisdiction of the courts of New South Wales, Australia.
- (b) Certain privacy laws in other countries provides you with certain rights in relation to your personal information that may not be covered under the Australian Privacy Principles. These include the right to erasure, rights to data portability and right to object. If you would like to exercise these rights and you reside in those countries you can do so by contacting our Privacy Officer by email, who will assess your request.
- (c) For information about privacy generally, you may visit the Office of the Australian Information Commissioner's website at [www.oaic.gov.au](http://www.oaic.gov.au).