



SMSF Association Privacy Policy

Date: March 2016

SMSF Association Ltd ACN 103 739 617 is committed to maintaining the privacy of the individuals with whom we work, or come in contact with during our work.

We are committed to continued compliance with the Australian Privacy Principles, and to enforcing our policies, procedures and compliance on our staff, officers and contractors.

This Privacy Policy was prepared to outline to individuals we deal with the key principles that affect their privacy, and to prompt them to advise us if they wish to be treated differently than as presented below.

Other policies may override this Privacy Policy in certain circumstances. For example, when we collect personal information from you, we may advise a specific purpose for collecting that personal information, in which case we will handle your personal information in accordance with that purpose.

This Privacy Policy is intended to cover most personal information handled by us, but is not exhaustive. If you have any queries about our handling of your personal information, please contact us for further information.

What kind of personal information do we collect and hold?

During the performance of our services we may collect and hold the following personal information:

- Individual official and preferred names, titles, post-nominals, awards, private and business address details, telephone and facsimile contact details (both private and business), e-mail addresses, social media handles, date of birth, gender, marital status;
- Individual qualifications, education and academic history, work experience and skills, occupation, employer information, insurance details, areas of practice, areas of professional interest, areas of interest, details of disciplinary action;
- Individual membership of Associations, Institutions, Technical Colleges, Registrations, special interest groups and other general interest groups;
- Financial details including credit card numbers, bank account information, financial status, financial conduct, SMSF fund information;
- Evaluation, audit, review and evaluation records created when a person applies for accreditation;
- Results of examinations, knowledge tests, surveys;
- Curricula Vitae, Degrees, letters of reference, police records and or details of any professional misconduct; and / or
- Other information and documents that may be of relevance to our activities.

When collecting your personal information, we will take reasonable steps to make you are aware of the purposes for which we are collecting it, the types of organisations to which we would usually disclose it, whether we are likely to disclose it to overseas recipients (and where practicable the countries in which they are located), whether there are laws or court/tribunal orders which require or authorise us to collect it, and the main consequences if you fail to provide it to us. This Privacy Policy provides these details as they typically apply in most cases, however different details may apply depending on our specific interaction with you. If we do not notify you of such other details, the information in this Privacy Policy applies.

If you do not provide personal information requested by us, there may be a range of consequences, for example, we may not be able to respond to your enquiry or otherwise deal with you. There will not usually be Australian laws or court/tribunal orders which require or authorize us to collect your personal information.

How do we collect personal information?

We collect most personal information direct from you, for example, when you:

- fill in application forms, agreement forms, direct debit forms, or other forms;
- deal with us personally, over the telephone, send a letter, or visit the web site;
- apply for services we provide; and
- create an account with us, for example, for professional membership services or for our Trustee website.

There may be occasions when we collect personal information from a third party, in which case we will take reasonable steps to notify you of that information and the circumstances of its collection.

How do we use your personal information?

We may use your personal information for the primary purpose for which it is collected and for related purposes we consider would be within your reasonable expectations.

We may use your personal information for purposes related to the primary purpose we collect it, such as:

- Internal accounting and administration;
- SMSF Association research to inform public policy and advocacy; and
- Helping us to identify and inform you about other services that may be of benefit to you.

Without being bound to do so, the SMSF Association reserves the right in the event of a complaint or legal action against you, to reveal whatever information we know about you relevant to that complaint or legal action, as permitted by the Privacy Act.

We use "cookies", which identify your computer to our servers when you visit our website. Our website may store cookies on your computer in order to improve and customise your future visits to the website. By using cookies, we can track information about your usage of the site and to provide customised content. If you do not wish to allow the use of cookies, you may be able to configure your Internet browser to disable cookies.

We do not attempt to specifically identify or track individuals using cookies.

Disclosure of your personal information

We may disclose personal information held about an individual in the following circumstances:

- We may contract out some of our functions and activities and as such we may disclose personal information to relevant contractors and service providers. For example, we may disclose information to allow printing of renewal invoices, statements etc;
- We may provide names and addresses to a mailing house to mail information to you. In these situations, we prohibit the third parties from using personal information about you except for the specific purpose for which we supply it;
- We may disclose to the public that you are a member of the SMSF Association unless you have advised us that you do not want this information released; and
- We may make the SMSF Association Specialist Member Register and lists publicly available. This is to recognise that you have been Certified or Accredited as a SMSF Association Specialist member or have recently lost said Certification or Accreditation;
- We may disclose your personal information where we are compelled by law, where it is permitted by the Privacy Act, or with your consent.

We may disclose your personal information to overseas recipients if it is required to fulfill the purpose for which we collected it, in which case we must take reasonable steps to ensure that the overseas recipient does not breach the Australian Privacy Principles as required by Australian Privacy Principle 8. However, we are not generally likely to disclose personal information to overseas recipients.

Otherwise than in the circumstances above, we do not sell, or provide our databases, mailing lists or other lists to any third party not involved in our processes.

Accuracy of your personal information

If we have accurate personal information about you, it enables us to provide you with the best possible service. We take reasonable steps to ensure that the personal information we collect is accurate, complete and up to date and the personal information we use and disclose is accurate, up to date, complete and relevant.

If you find that current personal information we hold about you is inaccurate, incomplete, out of date, irrelevant or misleading, please contact us immediately.

You are able to directly make changes to certain personal information via the SMSF Association website. We encourage you to use this service to maintain up to date records to allow us to provide accurate member services.

Access to and correction of your personal information

You may contact us to request access to or correction of the personal information about you that we hold. We may refuse to allow access or to amend your personal information if we are legally required or entitled to do so. If we do so, we will provide you with written reasons for the refusal (unless it is unreasonable to do so) together with information about the options available to complain about the refusal.

If you lodge a request for access to your personal information, we may fulfill that request in any of a range of ways (for example, by supplying you with a copy of that personal information or providing you with the opportunity to inspect our records). We may require you to comply with certain procedures before we allow access to or amendment of your personal information to ensure the integrity and security of information that we hold. Depending on the nature of

your request, this may include verifying your identity to our satisfaction.

Your request to provide information will be dealt with in a reasonable time and we may charge you an administration fee for retrieving and sending the information to you.

Security of your personal information

We protect any personal information that we hold about you from misuse, interference and loss as well as unauthorized access, modification or disclosure.

Our staff and officers are responsible for handling personal information in accordance with this Privacy Policy.

Your personal information may be stored in hardcopy documents, as electronic data, or in our software or systems. We maintain security over paper and electronic data stores as well as computer and network security systems.

We use a secure server, with 128 bit Secure Sockets Layer (SSL) encryption.

We make no warranty in respect of the strength or effectiveness of the encryption. If you provide any personal information to us via our online services (including email) or if we provide such information to you by such means, the privacy, security and integrity of this information cannot be guaranteed during its transmission unless we have indicated beforehand that a particular transaction or transmission of information will be protected (for example, by encryption).

We will endeavor to destroy or de-identify your personal information as soon as it is no longer required by us (where permitted by law).

Who to raise your concerns with

If you believe that the privacy of your personal information has been compromised, you are entitled to complain. If you have a complaint or concerns please write to:

SMSF Association Complaints Manager, Privacy Issue: PO Box 6540, Halifax Street,
ADELAIDE, SA 5000

Your written complaint must include a return address – refer complaints process.

Your complaint will be considered and dealt with by our Complaints Manager. The Complaints Manager may escalate the complaint internally within our organisation if the matter is serious or if necessary to resolve it.

Please allow a reasonable time to respond to your complaint. If you are not satisfied with our resolution, you may make a complaint to the Office of the Australian Information Commissioner, whose contact details can be found at: <https://www.oaic.gov.au/>.

Changes

We reserve the right to amend this Privacy Policy at any time. We publish our current Privacy Policy on our website, and you may obtain a copy of our Privacy Policy from that website or by contacting us.