



**Future Group
Privacy Policy
December 2023**

1. Overview

This Privacy Policy (**Policy**) applies to Future Group Australian Holdings Pty Ltd and its related bodies corporate (**Future Group, we, us, and our**) including promotional and administration activities for Future Super, smartMonday, Verve, GuildSuper and Child Care Super. It outlines how we manage your personal information and safeguard your privacy.

At Future Group, we understand your concerns about privacy and the security of your personal information. Your privacy is important to us, and we are bound by the Privacy Act 1988 (Cth) (the **Act**) and the Australian Privacy Principles ('**APPs**'). We are committed to protecting the personal information that we hold about you.

To ensure compliance with the Privacy Act and as part of our commitment to ensuring the security of your private and confidential information, we have established and implemented this Policy.

Future Group will:

- take reasonable steps to protect your information.
- comply with the notification requirements of the Act if we are aware of your information being lost or compromised.
- never sell your information to a third party.
- use information we collect from you and from other sources to provide services to you and to improve how we operate and provide those services.

2. Future Group Activities

Future Group provides:

- administration, sponsor and promotional activities on behalf of superannuation and investment management funds;
- financial product advice to superannuation and investment management fund members; and
- investment management and consulting activities on behalf of institutional clients

3. Collecting your personal information

3.1 What is personal information?

Personal information is information or an opinion that allows others to identify you. This includes your name, gender, contact details, as well as your health and financial information.

3.2 Why do we collect, hold and use your personal information?

We will only collect personal information that is reasonably necessary to offer and administer our services and products, or to provide information about a service or product or any other information that you have requested from us. We will collect personal information only by lawful and fair means.

We may also collect personal information to:

- identify and interact with you;
- open and administer your super and retirement accounts, including any insurance entitlements, and keep you informed about your accounts and entitlements and opportunities available to you as a member;
- open and administer an investment product we promote, and keep you informed about your accounts and entitlements and opportunities available to you as a member;
- assess your eligibility for products and services (including insurance) and events;
- help you combine your super accounts and check if you have lost super (when you ask us to);
- provide advice and other services to you;
- help improve our products and services;
- manage and resolve complaints;
- conduct market or customer satisfaction research;
- develop, establish and administer alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services;
- comply with any legal requirements, including any purpose authorised or required by an Australian law, court or tribunal; or
- for any other purpose for which you give your consent.

If you are not a customer but interact with Future Group, we may collect information to identify and interact with you.

If you are a contractor or prospective staff member, we may collect information to allow us to carry out our recruitment functions, to correspond with you, to fulfil the terms of any contractual relationship and/or to ensure that you can perform your duties.

3.3 What type of information can we collect from you?

Personal information

The type of information we collect will depend on the type of product or service you request. Examples of personal information we collect includes:

- name
- contact details
- date of birth
- gender
- tax file number (TFN)
- bank account details
- Technical and usage eg IP address, cookies (when you use our website)

Sensitive information

For some of our products and services, we may also need to collect sensitive information about you where the information is necessary for one or more of our functions or activities and you consent to the collection, or it is required or authorized by law. This may include:

- Health and lifestyle information eg if you apply for insurance cover, or for the purpose of assessing an entitlement;
- Photographic identity documents for customer identification; and
- information about your criminal convictions, political affiliation, membership of professional or trade associations and sexual preferences.

Sensitive information will only be used for the purpose for which it was provided.

If you provide us with information about other individuals (such as employees, dependents etc.) you must obtain their consent for us to use their information in accordance with our Privacy Policy prior to your disclosure to us or otherwise let us know if this is not the case.

3.4 What happens if you don't provide us with your information, or provide incomplete or inaccurate information?

You do not have to give us your personal information. However, if you choose not to, we may not be able to provide you with our products or services or more information about them. We might not be able to process your transactions or allow you to access our online services.

If you do not provide the information we request, you would like to remain anonymous or you want to use a pseudonym, we might not be able to provide the appropriate type or level of service or product.

3.5 How do we collect your information?

Unless impracticable or unreasonable to do so, we will collect information directly from you. This might be when you contact us by telephone, email, letter or online in order to complete a product or service application, or any other kind of administrative form. Our emails may contain automatic features that collect personal information. You can engage with us through social media or our website, or through our mobile phone app.

If we are permitted by law to do so, we may collect information about you from third parties. We may collect this information from third parties such as our affiliates, Authorised Representatives, or other third parties such as employers, insurance companies, financial institutions, medical professionals, law enforcement, dispute resolution, statutory and regulatory bodies, marketing lists and industry databases, publicly available sources or other government bodies.

If you ask us we will take reasonable steps to let you know how we have sourced your personal information, unless it is obvious from the circumstances that you would know or would reasonably expect us to have the information (such as where we are dealing with your advisers).

3.6 How do we notify you and obtain your consent?

In most cases, we will obtain your consent to handle your personal information either at the time you engage us to provide you with a product or service, or as soon as practicable. Consent can be either express or implied. Where consent is requested, we will properly inform you what you are consenting to.

3.7 Modifying your consent and opting-out of marketing

We may use your personal information to contact you to promote and market our products and services. You may modify or withdraw your consent, or opt-out of receiving direct marketing at any time by contacting the Privacy Officer (privacy@futuregroup.com.au).

If you receive electronic communications, such as an e-newsletter, you may unsubscribe at any time by following the instructions included in the communication.

If you previously chose to receive push notifications on your mobile device, you can manage your preferences either through your device or the application settings. Alternatively, you may uninstall the application by using the uninstall process available on your mobile device.

To prevent the use of cookies and the associated advertising, you need to adjust the settings on your browser to refuse all cookies.

Once we receive a request to opt out from receiving marketing information, we will stop sending such information within a reasonable amount of time.

3.8 How do we deal with unsolicited information?

Where we receive information that we have not requested (“unsolicited information”), we will determine whether we could have legally collected the information, and whether it is reasonably necessary for our functions or activities. If it is, we will handle the information in the same way that we handle information we have requested. If not, we will take steps to destroy or de-identify the information.

4. Using and disclosing your personal information

We will generally only use and disclose your personal information for the purpose that it was collected for, any related purpose that you would reasonably expect us to use or disclose it for, for the purpose of analytics, or as permitted under this Privacy Policy or under any law. Future Group otherwise has a duty to maintain the confidentiality of its clients’ information unless disclosure is permitted with your consent or compelled under any law.

4.1 Using your personal information

Your information may be used for the following purposes to:

- provide the information, products or services you requested or have received;
- determine your eligibility and process applications for products and services you have requested or have received;
- understand and assess your ongoing needs, and to offer products and services to meet those needs;
- administer insurance and benefit payment claims;
- monitor and train, and for security and audit purposes;
- develop new services;
- manage a complaint;
- comply with our legal obligations; and
- market products and services.

We may conduct data analysis and data analytics on customer information we hold. Generally, this information is based on aggregated data that doesn’t contain information that identifies individuals.

4.2 Disclosing your personal information

We may disclose your information to our affiliates or third party service providers to assist us in providing, managing and administering our services and products, such as:

- with any third party on specific matters if you have expressly consented to the disclosure;
- our Authorised Representatives;
- to your beneficiaries or dependents in the event of your death;
- with service providers/third parties that we need to deal with for the purposes described in section 3.2 including: superannuation administrators, insurers, your employer, identity verification agencies, mail houses, auditors, actuaries and lawyers, web hosting companies, web and application developers, other superannuation funds and administrators if you transfer your investment to another fund, and external IT service providers, infrastructure and other third parties where required by law.
- Law enforcement and fraud prevention agencies (for example the police) that may require disclosure on legal grounds.

We will only use and disclose your sensitive information for the purpose it was collected, for any other directly related purpose that you would reasonably expect us to use it for, or in accordance with a law or

regulation. With your consent, we may use or disclose your information for additional purposes from time to time.

In addition to our affiliates, we may also disclose personal information to third parties such as our contractors, agents and service providers when we outsource certain functions, including market research, marketing, claims handling and recruitment. This would also include our third party storage providers whom we may use from time to time to store information physically or electronically.

4.3 Overseas disclosure of your personal information

Some of our contractors, agents and service providers are located outside of Australia, meaning your personal information may be disclosed to a recipient in other countries. We limit the use and disclosure of personal information to the purpose for which it was provided.

In addition, anonymised web traffic information is disclosed to third party analytics platforms when you visit our websites (who may store the information across multiple countries) and when you communicate with us through our social media applications, where the provider and its partners may collect and hold your personal information overseas.

We will not disclose your personal information to overseas recipients unless and until we have taken reasonable steps to ensure that the overseas recipient will handle your personal information in a manner consistent with the APPs, or you have consented to the transfer of the information.

4.4 Holding and retaining your personal information

We take reasonable precautions to protect and secure your personal information from misuse, interference, loss, unauthorised access, modification or unauthorised disclosure.

Your personal information is held by us electronically on secure systems provided by cloud service providers. It may also be held in hardcopy form, for example, in paper files which are archived in a secure facility. Personal information held electronically is secured by passwords, encryption and firewalls in line with Australian information security standards. We undertake audits and monitoring of staff access to our systems.

Your personal information is only retained for as long as necessary to fulfil the purpose/s for which it was collected, unless we are required to retain the information for a certain period of time under an Australian law or court or tribunal order. Once no longer required, we take such steps as are reasonable in the circumstances to destroy or permanently de-identify your personal information.

5. Accessing and correcting your personal information

5.1 How can I access and correct my information?

We ask that you help us keep your personal information accurate, up to date and complete. You should contact us to update your personal information or advise us if the personal information we hold is not accurate, up to date or complete. You may ask to see the personal information we hold about you and to have it corrected if necessary. We will need to verify your identity before giving you access.

You can access or update your personal information as follows:

- if you have created a profile or an account on our website, you can update your information once you log in;
- contact our Privacy Officer (privacy@futuregroup.com.au).

If we do not provide you with access or refuse to update your information, we will provide you with the reason for refusal and complaint options available to you.

If we incur a cost in giving you access to your personal information, we may need to charge you for the associated cost(s).

There may be exceptional circumstances where we cannot provide you with access to your personal information because of reasons outlined in the Australian Privacy Principles, or where we consider your request to be frivolous or vexatious. In these cases we will advise you in writing why we cannot provide you with the information and information about how to make a complaint about the refusal.

5.2 Resolving privacy issues

If you have any questions, would like further information about our privacy and information handling practices, would like to discuss opt-outs, believe that your privacy has been breached or you have a privacy complaint, please contact the Privacy Officer:

Post: Attn: Privacy Officer
Future Group (or one of its relevant bodies, e.g. Future Super, smartMonday, Verve, GuildSuper or Child Care Super)
Level 3, 31 Alfred Street
Sydney NSW 2000

Email: privacy@futuregroup.com.au

Phone – Future Super: 1300 658 422
Phone – smartMonday: 1300 262 241
Phone – Verve: 1300 799 482
Phone – GuildSuper: 1300 361 477
Phone – Child Care Super: 1800 060 215

We are committed to respecting your privacy and we will respond to you as soon as reasonably possible. You can also refer to our Complaints Policy for information on how we manage and respond to complaints.

If you are not satisfied with the resolution of your complaint, you can refer your complaint to the Office of the Australian Information Commissioner by one of the options below:

Post: GPO Box 5218 Sydney NSW 2001
Email: enquiries@oaic.gov.au
Phone: 1300 363 992
Online: <https://www.oaic.gov.au>

6. Privacy online

The internet is not a secure environment. If you use the internet to send us personal information you do so at your own risk.

6.1 Website cookies

We make use of “cookies” technology on our websites. We use cookies to distinguish you from other users of our websites, improve the functionality of our websites and to learn more about the way that users interact with our content.

You can disable the use of cookies through your internet browser preferences. Please note, if you choose to block all cookies you may not be able to access all or a part of our websites and may be unable to engage in some activities.

6.2 Web beacons

We may also use tracking technologies called web beacons to collect information about your visit to our sites. Like cookies, this technology enables us to track pages and content accessed and viewed by users on Future Group sites. Also, when we send HTML-formatted (as opposed to plain text) emails to our users, this technology may be embedded in such emails. Using web beacons allows us to determine whether emails have been opened or links were accessed, and identify aggregate trends, individual usage, and generate statistics about how our site is used.

You can avoid web beacons by choosing to open emails in plain text. You can manage these settings through your email application.

6.3 Remarketing

Our websites use the Google AdWords remarketing service and similar services from other providers to advertise on third party websites (including Google) to previous visitors to our sites. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network, or other sites. Third-party vendors, including Google, may distribute ads based on someone's past visits to the Future Super websites.

Of course, any data collected will be used in accordance with our own privacy policy, Google's privacy policy or the privacy policy of other remarketing services used by Future Super.

6.4 Links to other websites

You may be able to access external websites by clicking on links provided on Future Group websites. These websites aren't subject to our privacy standards and procedures. Once you leave our websites, our privacy policy no longer applies. You'll need to review those websites directly to view a copy of their privacy policies and to ensure your personal information is protected.

6.5 Social media applications

Whilst we may use social networking platforms for communications, we won't ask you to supply personal information publicly over these platforms. Sometimes we'll invite you to send your details to us via private messaging, for example, to answer a question you have raised about your superannuation account.

Any personal information that you contribute to the publicly accessible sections of social media applications can be read, collected and used by other users of the application. We have no control over these other users and cannot guarantee that any information that you contribute to any social media applications will be handled in accordance with our privacy standards.