



## Privacy Policy

21 September 2022

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Our Commitment Xpress Super is committed to providing you with the highest levels of client service. We recognise that your privacy is very important to you. The Privacy Act 1988 (Cth) sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at <http://www.oaic.gov.au>.

This Privacy Policy discloses the purpose, and how the personal and credit information you provide to us and our representatives, is collected, used, held, disclosed and disseminated. Any amendments to this Privacy Policy will be notified to you by us posting an updated version on our website. We encourage you to check our website regularly for any updates to our Privacy Policy.

### Your Personal Information

Xpress Super may collect and hold the following personal information about you:

- your name;
- contact details including addresses and phone numbers;
- date of birth;
- tax file number;
- your occupation;
- information about the goods or services you have ordered from us
- information from enquiries you have made
- communications between us
- credit card information (although we do not retain this information)
- information regarding your dependents; and
- other personal information required to provide our services, such as investment records, superannuation records and bank records.

In addition, Xpress Super may collect and hold the following credit information:

- identification information – name, date of birth, current or previous address, driver's license number;
- type and amount of credit sought;
- trade references – name of entity, ABN, contact name, telephone number, fax number, email, years trading with you;
- publicly available information about an individual's creditworthiness; and
- default information.

### How We Collect Personal Information

We collect personal information from you in a variety of ways, including: when you interact with us electronically or in person; when you access our website; and when we provide our services to you. We may also collect personal information from you from third parties once authorisation has been provided by you. You have the right to refuse us authorisation to collect.

### How We Use Your Personal Information

Primarily, your personal and credit information is used in order to provide our services to you. We may also collect, hold and disclose your personal and credit information for the following purposes:

- to promote and market our products and services to you or provide you with information that we believe may be of interest to you (unless as directed otherwise);
- to personalise and customise your experience with our website;
- to help us research the needs of our clients and to market our goods and services with a better understanding of your needs and the needs of clients generally;
- to allow us to provide advertising material to you regarding us, our clients, and other business partners (unless as directed otherwise); and
- other purposes related to any of the above,

(“primary purposes”).

We may also use the information for a purpose that is related to the primary purposes, if this use would be reasonably expected by you, or otherwise with your consent.

You do not need to provide all the information requested by us, but this may prevent us from providing some or all of our products or services to you.

From time to time, we may provide you with direct marketing material. If, at any time, you do not wish to receive this information any further, you may contact us with this request. You will be given the opportunity to “opt out” from receiving communications from us. You may “opt out” from receiving these communications, such as newsletters, emails and other marketing and promotional materials, by clicking on an unsubscribe link at the end of an email. We maintain details of the source of your personal information used for direct marketing and you have the right to request these details. We will endeavour to meet any requests within 2 weeks. We maintain a Register for those individuals not wanting direct marketing material.

## When We May Disclose Your Personal Information\*

In line with modern business practices common to many financial institutions and to meet your specific needs we may disclose your personal or credit information to the following organisations:

- superannuation fund trustees, insurance providers, fund managers and other product providers in order to manage or administer your product or service;
- compliance consultants;
- contractors or temporary staff to handle workloads during peak periods;
- mailing houses;
- insurance reference bureaus and loss adjusters
- your professional advisers, including your solicitor or accountant as authorised by you;
- information technology service providers;
- another authorised representative of Xpress Super if necessary;
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them;
- a new owner of our business that will require the transfer of your personal information; or
- government and regulatory authorities, as required or authorised by law

Our employees and the outsourcing companies/contractors are obliged to respect the confidentiality of any personal information held by Xpress Super. We do not disclose your credit information to any credit reporting bodies.

## How We Store and Secure Your Personal Information

We keep your personal and credit information in your client files or electronically. These files are accessible to authorised personnel only and are appropriately secured and subject to confidentiality requirements.

Personal and credit information is treated as confidential information and sensitive information is treated as highly confidential.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

## Ensure Your Personal Information Is Correct

Xpress Super takes all reasonable precautions to ensure that the personal and credit information we collect, use and disclose is accurate, complete and up-to-date.

To ensure we can maintain this level of accuracy and completeness, we recommend that you:

- inform us of any errors in your personal and credit information; and
- update us with any changes to your personal or credit information as soon as possible.

If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

### Unsolicited personal information

We don't usually collect unsolicited personal information. Where we receive unsolicited personal information, we'll determine whether or not it would have been permissible to collect that personal information if it had been solicited. If we determine that collection would not have been permissible, to the extent permitted by law, we'll destroy or de-identify that personal information as soon as practicable.

### Access to Your Personal Information

You have a right to access your personal or credit information, subject to certain exceptions allowed by law. We ask that you provide your request for access in writing, addressed to the Privacy Officer at the address set out in the "Complaints Resolutions" section, (for security reasons) and we will provide you with access to that personal or credit information. Access to the requested personal or credit information may include:

- providing you with copies;
- providing you with the opportunity for inspection; or
- providing you with a summary.

If charges are applicable in providing access to you, we will disclose these charges to you prior to providing you with the information. Some exceptions exist where we will not provide you with access to your personal information, including if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful;
- denying access is required or authorised by or under law;
- providing access would be likely to prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security.

We will take appropriate steps to verify your identity (or verify that you act as an authorised agent of the individual concerned) before granting a request to access your personal information. We will respond to your request for access to your personal information within a reasonable time after you make the request and if access is granted, access will be provided within 30 days from your request.

Should we refuse you access to your personal or credit information, we will provide you with a written explanation for that refusal.

### Using Government Identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card number, we do not use or disclose this information other than when required or authorised by law or unless you have voluntarily consented to disclose this information to any third party.

### Dealing with us anonymously or using a pseudonym

You have the option to deal with us by not identifying yourself or by using a pseudonym where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

### Your sensitive information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliation, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record. Should we ever undertake direct marketing, we will only use or disclose your sensitive information with your consent.

This is subject to some exceptions including when:

- collection is required by law; and
- the information is necessary for the establishment, exercise or defence of a legal claim.

### Our Website

Xpress Super's website may provide links to third party websites. The use of your information by these third party sites is not within our control and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards. You will need to contact or review those websites directly to ascertain their privacy policies. You may register with us to receive newsletters and other information. By doing so, your name and email address will be collected and stored on our database. We take care to ensure that the personal information you give us on our website is protected. For example, our website has electronic security systems in place, including the use of firewalls and data encryption.

If you do not wish to receive any further information from us, or you wish to update your registration details, please email your request to us. We will endeavour to meet your request within 5 working days.

As is very common for companies, we use cookies on our website. Cookies are very small files which a website uses to identify you when you come back to the site and to store details about your use of the site. Cookies are not malicious programs that access or damage your computer. We use cookies to improve the experience of people using our website but you can instruct your web browser to refuse them.

### Complaints Resolutions

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. They will investigate the issue and determine the steps needed to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the determination of our Privacy Officer. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Australian Information Commissioner at [www.oaic.gov.au](http://www.oaic.gov.au).

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