

## PFS Nominees Pty Ltd Privacy Policy

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### Respecting your privacy and the law

Plum Financial Services Limited (the Administrator) and PFS Nominees Pty Ltd (the Trustee) are subsidiaries of MLC Limited, a member of the National Australia Bank Group of companies. The Administrator and the Trustee respect your right to privacy and protection of your personal information. We are bound by the National Privacy Principles in the Privacy Act 1988 (Commonwealth) and any relevant Health Privacy Principles under State legislation, as well as other applicable laws and codes affecting your personal information. Our staff are trained to respect your privacy in accordance with our standards, policies and procedures.

### About this Privacy Policy

This Privacy Policy outlines how we, The Administrator and Trustee (if applicable), manage your personal information. It also describes:

- The types of personal information held
- The purposes for holding that information
- How that information is collected, held, used and disclosed.

This Privacy Policy applies to all your dealings with the Administrator and the Trustee. We encourage you to check the Plum website [www.plum.com.au](http://www.plum.com.au) regularly for any updates to this Privacy Policy.

### The types of personal information Plum holds

The Administrator, on behalf of the Trustee of your superannuation arrangement, collects and holds information necessary to administer your superannuation account and to provide you with information related to that account.

The information collected may include your name, postal or email address, date of birth, Tax File Number (TFN), health information, bank account details (when you are eligible to receive a superannuation benefit payment) or other information the Administrator considers necessary to administer your superannuation account.

### Using and disclosing your personal information

In line with modern business practices common to many financial institutions, we may disclose your personal information to the organisations described below. Where your personal information is disclosed, we will seek to ensure that the information is held, used or disclosed consistently with the National Privacy Principles in the Privacy Act 1988 (Commonwealth), any relevant Health Privacy Principles under State legislation and other applicable privacy laws and codes.

The relevant organisations are those:

- engaged in providing, managing or administering your superannuation account such as third party suppliers, printers, postal services and our advisers
- who are other entities in the National Australia Bank Group of companies to understand and/or manage your relationship with any or all members of the Group
- who are your financial adviser or legal adviser if you have authorised Plum to provide the information
- involved in a corporate reorganisation
- involved in maintaining, reviewing and developing our business systems, procedures

and infrastructure including testing or upgrading our computer systems

- involved in the transfer of all or part of the assets or business of the Administrator
- involved in superannuation, investments and insurance payments system including financial institutions, merchants and other payment organisations
- involved in product planning and development
- as required or authorised by law e.g. to government or regulatory bodies for purposes related to public health or safety, the prevention or detection of unlawful activities or to protect public revenue
- where you have given your consent.

Your personal information may also be used in connection with the above purposes.

Because we operate throughout Australia and overseas, some of these uses and disclosures may occur outside your State or Territory and/or outside of Australia.

### Marketing our products and services

We may use or disclose your personal information to other entities in the National Australia Bank Group of companies for the purpose of telling you about other products or services that may service your financial or lifestyle needs or promotions or other opportunities.

You can contact us at any time if you no longer wish us to do so (see **Contacting us** below).

### Keeping your personal information up to date

We aim to make sure that the personal information we collect, use or disclose is accurate, complete and up to date. We will take reasonable steps to make sure this is the case.

If you believe your personal information is not accurate, complete or up to date, please contact us (see **Contacting us** below).

### **Protecting your personal information**

We store information in different ways, including in paper and electronic form. The security of your personal information is important to us and we take reasonable steps to protect it from misuse, loss, unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements for our employees
- document storage security policies
- security measures for systems access
- providing a discreet environment for confidential discussions
- only allowing access to personal information where the individual seeking access has satisfied our identification requirements
- access control for our buildings
- the security measures described below under the **Plum Website**.

### **Your privacy on the Internet**

#### **The Plum Website**

We take care to ensure that the personal information you give us via our website is protected. Our website has electronic security systems in place, including firewalls and data encryption. User IDs, passwords and other access codes are also used to control access to your personal information. Please refer to the Plum Website under **Help** for more information about the security features of our website and other information such our policy in relation to the use of cookies.

#### **Links to other sites**

Our website contains links to other sites. Those other websites are not subject to our privacy standards,

policies and procedures. You will need to contact or review those websites directly to ascertain their privacy standards, policies and procedures.

### **Gaining access to your personal information**

You can gain access to your personal information. This is subject to some exceptions allowed by law. Factors affecting a right to access include:

- access that would pose a serious threat to the life or health of any individual
- access that would have an unreasonable impact on the privacy of others
- a frivolous or vexatious request
- information that relates to a commercially sensitive decision-making process
- access that would be unlawful
- access that would prejudice enforcement activities relating to criminal activities and other breaches of law, public revenue, a security function or negotiations with you
- where a third party has given us health information about you in confidence
- where denying access is required or authorised by or under law.

We will give you reasons if we deny access.

Contact us to get a form requesting access (see **Contacting us** below). In some cases we may be able to deal with your request over the telephone.

### **Using Government identifiers**

Although in certain circumstances we may collect government identifiers such as your tax file

number, we do not use or disclose this information other than when required or authorised by law.

### **Dealing with us anonymously**

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you inquire about general information in relation to your superannuation account, you do not need to provide your personal details.

### **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 affiliations, membership of a professional or trade association, membership of a trade union, details of health, disability, sexual orientation or criminal record.

This is subject to some exceptions including when:

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

### **Resolving your privacy issues**

If you have any privacy issues you wish to raise with us, you are able to do so in a number of ways (see **Contacting us** below). If investigation is required we will keep you advised of the progress.

### **Contacting us**

You can contact us about a privacy related inquiry or issue by email, telephone or post.

**Email** [service@plum.com.au](mailto:service@plum.com.au)  
**Phone** 1300 55 7586  
**Address** GPO Box 63  
Melbourne 3000