



## Respecting your Privacy

We respect your personal information, and this Privacy Policy explains how we handle it. We take appropriate measures to ensure NAB can engage securely with and for our customers. The policy covers National Australia Bank Ltd ABN 12 004 044 937 and all its related companies, including NULIS Nominees (Australia) Limited, ABN 80 008 515 633 (the 'NAB Group'), which includes all of our banking, financing, funds management, financial planning, superannuation, insurance, broking and e-commerce organisations. As some of our related companies may have specific legal requirements, they may have separate, but consistent policies. Please view these if they are more relevant to your relationship with the Group.

This Policy also includes our NAB Group credit reporting policy, that is, it covers additional information on how we manage your personal information collected in connection with a credit application, or a credit facility. We refer to this credit-related information below as **credit information**.

### What personal information do we collect and hold?

#### General information

The types of information that we collect and hold about you could include:

- ID information such as your name, postal or email address, telephone numbers, and date of birth;
- other contact details such as social media handles;
- financial details such as your tax file number;
- health and biometric information (e.g. fingerprints, voice patterns) where permitted);
- your location or activity including IP address, and whether you've accessed third party sites;

- credit information such as details relating to credit history, credit capacity, and eligibility for credit ('credit worthiness'); and
- other information we think is necessary.

Over the course of our relationship with you, we may collect and hold additional personal information about you, including transactional information, account or policy information, complaint or enquiries about your product or service.

If you have general enquiry type questions, you can choose to do this anonymously or use a pseudonym. We might not always be able to interact with you this way however as we are often governed by strict regulations that require us to know who we're dealing with.

#### What sensitive information do we collect?

Sometimes we need to collect **sensitive information**<sup>1</sup> about you. This could include information about your health or reasons relating to hardship. Unless required by law, we will only collect sensitive information with your consent.

#### When the law authorises or requires us to collect information

We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax law, which require us to collect personal information. For example, we require personal information to verify your identity under Commonwealth Anti-Money Laundering law.

<sup>1</sup> Sensitive information is information about a person's racial or ethnic origin, political opinions, membership of a political association, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association or trade union, sexual preferences or practices, criminal record, health information, genetic or biometric information.

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### What do we collect via your website activity?

When you use NAB Group websites or mobile applications we may collect information about your location or activity including IP address, telephone number and whether you've accessed third party site. If you use internet banking or our websites, we monitor your use of those online interactions. This is done to ensure we can verify you and you can receive information from us, to identify ways we can improve our services for you and to understand you better. Some of this website or application information is collected using cookies. For more information on how we use cookies and tracking tags see our Cookies Policy [www.nab.com.au/cookies](http://www.nab.com.au/cookies).

If you start but don't submit an online form we can contact you using any of the contact details you've supplied or other contact details we have for you to offer help (unless the use is anonymous).

We also know that some customers like to engage with us through social media channels. We may collect information about you when you interact with us through these channels. For all confidential matters, please interact with us via private messaging or secure channels.

Much of this data collection is done through the use of cookies and used to improve our services and enhance users online experience with us (e.g. website statistics), does not identify individual customers but does identify internet browser. Where we do identify you (such as where customers are logged onto our online services), NAB Group treats any use or disclosure in accordance with this policy.

### How do we collect your personal information?

#### How we collect and hold your information

There are many ways we seek information from you. We might collect your information when you fill out a form with us, when you've given us a call, used our websites or dropped into one of our branches. In addition, when you use our website or mobile applications we may collect information about your IP address, location or activity. We also find using electronic means, such as email or SMS, a convenient way to communicate with you and to verify your details, including doing e-verification of identity (e-Know Your Customer). However we'll never ask you for your security details in this way – if you are ever unsure, just contact us. We will try to collect personal information directly from you unless it's unreasonable or impracticable. For this reason, it's important that you keep your contact details up-to-date.

### How we collect your information from other sources

Sometimes we collect information about you from other sources. We may collect information about you that is publicly available (for example from public registers or social media) or made available by third parties. For instance, we do this where:

- we distribute or arrange products on behalf of others, including our business partners;
- we can't get hold of you and need to update your contact details;
- we need information from third parties about an application you make through us;
- we need information for fraud prevention purposes;
- we are checking the security you are offering;
- we can learn insight about your financial needs, such as through property information;
- you have consented to third parties sharing it with us, such as organisations we have loyalty programs with or we sponsor;
- at your request, we exchange information with your legal or financial advisers or other representatives.

We may use or disclose information about you in order to combine the information that we hold with information collected from or held by external sources. We do this in order to enable the development of customer insights about you so that we can serve you better. This includes being able to better understand your preferences and interests, personalise your experience, enhance the products and services you receive, and to tell you about products and services that may be of interest to you. Where those insights are provided to others, such insights are based on aggregated information and do not contain any information that identifies you. We may also use service providers to undertake the process of creating these consumer insights.

### What if you don't want to provide us with your personal information?

If you don't provide your personal information to us, we may not be able to:

- provide you with the product or service you want;
- manage or administer your product or service;
- personalise your experience with us;
- verify your identity or protect against fraud; or
- let you know about other products or services that might better meet your financial, e-commerce and lifestyle needs.

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### What do we do when we get information we didn't ask for?

Where we receive unsolicited information, we will check whether that information is reasonably necessary for our functions or activities. If it is, we'll handle this information the same way we do with other information we seek from you. If not, we'll ensure we do the right thing and destroy or de-identify it.

### When will we notify you that we have received your information?

When we receive personal information from you, we'll take reasonable steps to notify you how and why we collected your information, who we may disclose it to and outline how you can access it, seek correction of it or make a complaint.

Where we collect your personal information from third parties we will take reasonable steps to notify you of the circumstances of that collection. We recommend our customers regularly review our website to review updates to this policy and our Privacy Notification ([www.nab.com.au/privacynotification](http://www.nab.com.au/privacynotification)).

### How do we take care of 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, interference and loss, and from unauthorised access, modification or disclosure. Some of the ways we do this are:

- confidentiality requirements and privacy training of our employees;
- document storage security policies;
- security measures to control access to our systems and premises;
- only giving access to personal information to a person who is verified to be able to receive that information;
- ensuring third parties meet NAB Group's privacy obligations; and
- electronic security systems, such as firewalls and data encryption on our websites.

We can store personal information physically or electronically with third party data storage providers. Where we do this, we use contractual arrangements to ensure those providers take appropriate measures to protect that information and restrict the uses to which they can put that information.

### What happens when we no longer need your information?

We'll only keep your information for as long as we require it for our purposes. We're also required to keep some of your information for certain periods of time under law, such as the Corporations Act, the Anti-Money Laundering & Counter-Terrorism Financing Act, and the Financial Transaction Reports Act for example. When we no longer require your information, we'll ensure that your information is destroyed or de-identified.

## How we use your personal information

### What are the main reasons we collect, hold and use your information?

Because we offer a range of services and products, collecting your personal information allows us to provide you with the products and services you've asked for. This means we can use your information to:

- provide you with information about products and services, including financial help guidance and advice;
- consider your request for products and services, including your eligibility;
- process your application and provide you with products and services; and
- administer products and services which includes answering your requests and complaints, varying products and services, conducting market research, taking any required legal action in relation to our accounts and managing our relevant product portfolios.

### Can we use your information for marketing our products and services?

We may use or disclose your personal information to let you know about products and services that we believe may be of interest to you, including products and services from our related companies or from those we distribute products on their behalf, including MLC Limited. We will not do this if you tell us not to.

Such marketing activities may be via email, telephone, SMS, iM, mail, or any other electronic means, including targeted advertising through NAB Group or other websites.

We may also market our products to you through third party channels (such as social networking sites), or via other companies who assist us to market our products and services. We may use de-identified data to disclose to online advertisers that allow us to place communications in the media most relevant to you.

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Where we market to prospective customers, we are happy to let them know how we obtained their information and will provide easy to follow opt-outs.

With your consent, we may disclose your personal information to third parties such as brokers or agents, or for the purpose of connecting you with other businesses or customers. You can ask us not to do this at any time.

### Yes, You Can Opt-Out

You can let us know at any time if you no longer wish to receive direct marketing offers (see 'Contact Us'). We will process your request as soon as practicable.

Where you have subscribed to something specific (like to hear from one of our sponsored organisations) then these subscriptions will be managed separately. If you no longer wish to receive these emails click the unsubscribe link included in the footer of our emails.

We know that you may prefer to receive some types of messages over others, so where possible we will offer you a choice. For instance, if you'd like to keep receiving particular messages on banking and finance products but not life insurance, then if we can, we will offer you a way to indicate that choice to us we will do so.

You can always update your preferences at any time.

### What are the other ways we use your information?

We've just told you some of the main reasons why we collect your information, so here's some more insight into the ways we use your personal information including:

- identifying you or verifying your authority to act on behalf of a customer;
- telling you about other products or services that may be of interest to you, or running competitions and other promotions (this can be via email, telephone, SMS, iM, mail, or any other electronic means including via social networking forums), unless you tell us not to;
- Identifying opportunities to improve our service to you and improving our service to you;
- determining whether a beneficiary will be paid a benefit;
- assisting in arrangements with other organisations (such as loyalty program partners) in relation to a product or service we make available to you;
- allowing us to run our business and perform administrative and operational tasks (such as training staff, risk management; developing and marketing products and services, undertaking planning, research and statistical analysis; and systems development and testing);

- preventing or investigating any fraud or crime, or any suspected fraud or crime;
- as required by law, regulation or codes binding us; and
- for any purpose for which you have given your consent.

### Who do we share your personal information with?

**To make sure we can meet your specific needs and for the purposes described in 'How we use your personal information', we sometimes need to share your personal information with others.** We may share your information with other organisations for any purposes for which we use your information.

#### Sharing with the NAB Group

We may share your personal information with other NAB Group members. This could depend on the product or service you have applied for and the NAB Group member you are dealing with but will not differ from those purposes outlined above. **Where appropriate we integrate the information we hold across the NAB Group to provide us with a complete understanding of your product holdings and your needs.** For example, where you hold a NAB Internet Banking ID and NAB Group superannuation product, some of the information we hold about you may also be exchanged for specific purposes such as allowing you to see your account summary information (e.g. balance) through NAB Internet Banking.

#### Sharing with MLC Limited

NAB acts for MLC Limited ABN 90 000 000 402 (described as MLC Life Insurance) in distributing their life insurance products. MLC Limited is no longer part of the NAB Group of companies. We may exchange personal information with MLC Limited or their service providers in order to administer and manage your life insurance products that are issued by them. We may also need to share information so as to ensure:

- your insurance premium is calculated correctly (balance information may be required to be shared so your insurance can be calculated) and where authorised, make payments on your behalf to MLC Limited;
- insurance claims and benefits are paid;
- insurance products are viewable to service customer contact (this includes showing your insurance products in NAB Internet Banking if you have a NAB Internet Banking ID);

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- NAB and MLC Limited can both tell you about our respective marketing and products offers (including ensuring customers who hold MLC Limited products are excluded from NAB Group campaigns marketing MLC Limited products);
- a smooth customer experience when you contact us, including:
  - we can transfer you to the right service centre;
  - where appropriate, NAB and MLC Limited can cooperate in order to handle your complaint;
  - being able to provide assistance should you wish to speak about your MLC Limited products held (e.g. where possible, we may assist by updating contact details on request).
- fraud reporting agencies (including organisations that assist with fraud investigations and organisations established to identify, investigate and/or prevent any fraud, suspected fraud, crime, suspected crime, or misconduct of a serious nature);
- organisations involved in surveying or registering a security property or which otherwise have an interest in such property;
- organisations we sponsor and loyalty program partners, including organisations the NAB Group has an arrangement with to jointly offer products or has an alliance with to share information for marketing purposes;
- companies we arrange or distribute products for, such as insurance products;

Some of the information exchanged will be stored and visible within NAB Group customer databases; with some of these databases being accessible to MLC Limited for a transition period. All information stored in these databases is subject to this privacy policy as well as NAB Group's security procedures and controls.

### Sharing with third parties

We may disclose your personal information to third parties outside of the Group, including:

- those involved in providing, managing or administering your product or service;
- authorised representatives of the NAB Group who sell products or services on our behalf;
- credit reporting bodies or other approved third parties who are authorised to assess the validity of identification information;
- insurance, investment, superannuation and managed funds organisations, and their advisers and service provider;
- medical professionals, medical facilities or health authorities who verify any health information you may provide;
- real estate agents, valuers and insurers (including lenders' mortgage insurers and title insurers), re-insurers, claim assessors and investigators;
- brokers or referrers who refer your application or business to us;
- other financial institutions, such as banks, as well as guarantors and prospective guarantors of your facility;
- organisations involved in debt collecting, including purchasers of debt;
- rating agencies to the extent necessary to allow the rating agency to rate particular investments;
- any party involved in securitising your facility, including the Reserve Bank of Australia (sometimes this information is de-identified), re-insurers and underwriters, loan servicers, trust managers, trustees and security trustees;
- service providers that maintain, review and develop our business systems, procedures and technology infrastructure, including testing or upgrading our computer systems;
- payments systems organisations including merchants, payment organisations and organisations that produce cards, cheque books or statements for us;
- our joint venture partners that conduct business with us;
- organisations involved in a corporate re-organisation or transfer of NAB Group assets or business;
- organisations that assist with our product planning, analytics, research and development;
- mailing houses and telemarketing agencies and media organisations who assist us to communicate with you, including media or social networking sites;
- other organisations involved in our normal business practices, including our agents and contractors, as well as our accountants, auditors or lawyers and other external advisers (e.g. consultants and any independent customer advocates);
- government or regulatory bodies (including the Australian Securities and Investment Commission and the Australian Tax Office) as required or authorised by law (in some instances these bodies may share it with relevant foreign authorities); and
- where you've given your consent or at your request, including to your representatives, or advisors.

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### Sharing outside of Australia

We run our business in Australia and overseas. We may need to share some of your information (including credit information) with organisations outside Australia. Sometimes, we may need to ask you before this happens. You can view a list of the countries in which those overseas organisations are located at [www.nab.com.au/privacy/overseas-countries-list/](http://www.nab.com.au/privacy/overseas-countries-list/)

We may store your information in cloud or other types of networked or electronic systems. As electronic or networked systems can be accessed from various countries via an internet connection, it's not always practicable to know in which country your information may be held. If your information is stored in this way, disclosures may occur in countries other than those listed.

Overseas organisations may be required to disclose information we share with them under a foreign law. In those instances, we will not be responsible for that disclosure.

### How do you access your personal information?

#### How you can generally access your information

We'll always give you access to your personal information unless there are certain legal reasons why we can't. You can ask us to access your personal information that we hold by filling out the Personal Information Access form (see [www.nab.com.au/privacy/access-form/](http://www.nab.com.au/privacy/access-form/)). In some cases we may be able to deal with your request over the phone or in a branch. See 'Contact Us' if you would like a copy of the form to be sent out to you.

We will give you access to your information in the form you want it where it's reasonable and practical (such as a copy of a phone call you may have had with us – we can put it on a disk for you). We may charge you a small fee to cover our costs when giving you access, but we'll always check with you first. You can find the schedule of fees explained on the Access form.

If we can't give you access, we will tell you why in writing. If you have concerns, you can complain. See 'Contact Us'.

### How do you correct your personal information?

Contact us if you think there is something wrong with the information we hold about you.

If you are worried that we have given incorrect information to others, you can ask us to tell them about the correction. We'll try and help where we can – if we can't, then we'll let you know in writing.

### How do you make a complaint?

If you have a complaint about how we handle your personal information, we want to hear from you. You are always welcome to contact us. We are committed to resolving your complaint and doing the right thing by our customers. Most complaints are resolved quickly, and you should hear from us within five business days (see 'Contact Us').

If you still feel your issue hasn't been resolved to your satisfaction, then you can escalate your privacy concern (see 'Contact details for escalating complaints').

### Contact details for escalating complaints

Need more help?

#### Financial Ombudsman Service

- **Online:** [www.fos.org.au](http://www.fos.org.au)
- **Phone:** 1800 367 287
- **Email:** [info@fos.org.au](mailto:info@fos.org.au)

#### Office of the Australian Information Commissioner

- **Email:** [www.oaic.gov.au/privacy](http://www.oaic.gov.au/privacy)
- **Phone:** 1300 363 992
- **Online:** [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)

#### Superannuation Complaints Tribunal

- **Online:** [www.sct.gov.au](http://www.sct.gov.au)
- **Phone:** 1300 884 114
- **Email:** [info@sct.gov.au](mailto:info@sct.gov.au)

### Contact Us

We care about what you think. Please contact us if you have any questions or comments about our privacy policies and procedures. We welcome your feedback.

You can contact us by:

- calling our contact centre on **1300 55 7586**
- writing to us at Plum Super GPO Box 63 Melbourne 3001

If you have contacted us by phone or in person and feel your issue still hasn't been resolved, the next step is to notify the contact centre that you want the matter referred to our Complaint Resolutions team.

## Changes to this Privacy Policy

This Policy may change from time to time. Please visit our website regularly as we will let you know of any changes to this Policy by posting a notification on our website. In addition, over the course of our relationship with you, we may tell you more about how we handle your information. This could be when you complete an application or form, or receive important disclosure documents from us, such as terms and conditions or a Product Disclosure Statement. We recommend that you review these statements too as they may have more specific detail for your particular product holdings.



## Contact us

For more information visit **plum.com.au** or call us from anywhere in Australia on **1300 55 7586** between 8am and 7pm AEST (8pm daylight savings time), Monday to Friday.

### Postal address

Plum Super  
GPO Box 63  
Melbourne VIC 3001

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