

PRIVACY POLICY

APS BENEFITS GROUP LTD

The APS Benefits Group Ltd (APSBG) is committed to protecting the privacy and confidentiality of information it collects from members, clients, service providers and contractors. In the conduct of its business, APSBG is bound by the Privacy Act 1988 (the Act) and therefore must comply with the Australian Privacy Principles (APPs) which govern the collection, use, handling and disclosure of personal information, including sensitive information.

APSBG has a number of wholly owned subsidiaries which are listed below:

- [APS Financial Planning Pty Ltd](#);
- [APS Tax, Accounting & Business Services Pty Ltd](#);
- [APS Savings Ltd](#); and
- [APS Wills & Estates Pty Ltd](#)

All of these (APSBG Subsidiary Companies) are also bound by the Act and by this Privacy Policy.

Unless otherwise indicated, references in this Privacy Policy to “we” and “us” include APSBG and the APSBG Subsidiary Companies (together “APS Benefits Group”).

References to “you” and “your” can include any person, whose personal information we collect, hold, use or disclose.

What is personal information and sensitive information?

Personal information is simply any information or opinion about you which is reasonably identifiable. It does not matter whether the information is true or not, and it does not have to be recorded in a material form.

Sensitive information is a special type of personal information which gives rise to special rules and obligations. It includes information relating to such areas as race, political views, religion, sexual orientation and health.

The kinds of personal information we collect and hold

The extent of personal information collected and held in relation to you will depend on:

- whether you are (or are to become) a member of APSBG, a client of ours or an employee of ours; and
- which services we provide to you.

The types of information fall into several broad categories:

- **Basic personal information** - name, address, date and place of birth
- **Contact information** - addresses, phone, fax numbers and email
- **Identification information** - driver's licence, Medicare card, passport
- **Employment information** - employer name, employee number and occupation
- **Bank information** - bank account and credit card details
- **Other financial information** - pay slips, profit and loss, assets and liabilities
- **Family information** - marital status, details of spouse and children
- **Nominated beneficiary information** - for a funeral benefit
- **Tax file number (TFN) information** – your TFN
- **Credit information** – credit reports, records, defaults etc

We will not request or hold any personal information in relation to you unless it is required for a lawful purpose connected to our business services as they relate to you.

How we collect and hold personal information

In most circumstances we collect information directly from you. This may be through correspondence, email, in person and by telephone. We may also obtain information from other members of the APS Benefits Group, other professional advisers, past or present employers, your medical practitioners and your bank, and, in some circumstances, other members or clients.

In relation to individuals acting as service providers, contractors or agents of the firm, we collect your name, contact details and relevant information concerning your dealings with us.

The purposes for which we collect, hold, use and disclose personal information.

Personal Information may be collected and used by us for the purposes listed below:

Name of entity	Type of information	Purpose
APS Benefits Group	basic personal information	-business necessity -establish identity
APS Benefits Group	contact information	-business necessity -establish identity
APS Benefits Group	identification information	-establish identity -fraud prevention - Anti-Money Laundering obligations
APS Benefits Group	bank information	-direct debit payments -fee for service payments -Fund loans/interest payments
APS Benefits Group	employment information	-membership qualification -payroll deduction
APSBG APS Tax	other financial information	credit worthiness professional advice
APSBG APS Tax, APS Wills & APS Fin Plan	family information	loan referees professional services
APSBG only	nominated beneficiary information	funeral benefit payment
APSBG only	credit information	see Credit Reporting Policy
Various	TFN information	see TFN Policy

In relation to clients, this information is collected to provide you with professional consulting services, advice and representation. In the provision of such services, we may provide information to agents to take actions or make enquires in relation to the conduct of your matter.

In relation to individuals acting as service providers, contractors or agents, we may use your information to access or use services provided by you or an organisation that you work for.

We use and disclose your information for the primary purpose for which you have provided the information. In addition to the use and disclosure of information outlined above, we use and disclose information for purposes ancillary and consequential to the primary purpose of collection such as invoicing, related correspondence and accurate file management. We may use the services of agents, service providers or contractors. All such third parties must comply with confidentiality duties and the Privacy Act in their handling and management of information.

At your instruction or according to the requirements of law, we may disclose your information to organisations such as regulatory authorities, government departments, courts, or other parties or advisers.

Each company in the APS Benefits Group may collect, hold, use and disclose any personal information about you which is already held by any other group member, provided such collection, holding, use or disclosure is for a purpose relevant to the provision or proposed provision of a service by us to you.

Direct marketing

We may also access your information to send you information about our activities or developments that we believe will be of interest to you. This may include activities or developments relating to any company in the APS Benefits Group or to the APS Benevolent Foundation ABN 43 672 464 060, which is a charitable fund associated with the APS Benefits Group. You will always be provided with the option to opt out of any or all such direct marketing by contacting the Privacy Officer or by emailing privacy@apsbenefitsgroup.com.au.

Security of information

The information you provide us is stored on computer and paper based files as appropriate. The secure storage and use of information is of paramount importance to us so that all reasonable steps are taken to protect the information from misuse or loss, or unauthorised access, modification or disclosure by means such as password and network protection, and secure storage of paper based and other records.

How to access personal information we hold

You may request access to personal information about you that we hold, however our discretion, duties and obligations under law may restrict your access. Given this, all reasonable actions will be taken to assist access or to address any reasons you have to seek access. If access is denied, we will provide you with reasons in accordance with law. We will either provide access or inform you of our denial of access within a reasonable time of your request.

If access is provided, a reasonable fee may be charged for time and other costs incurred in providing access.

Accuracy of personal information and how to seek correction

We take all reasonable steps to ensure that the information we collect is accurate, complete and up to date at the time of collection. If your circumstances change or you have reason to believe our records are not accurate, complete or up to date, please contact us immediately and we will take all reasonable steps to amend the information in accordance with the above criteria or an alternative may be discussed with you within a reasonable time of your request. No fees are chargeable for correction of personal information.

We may refuse your request, in which case we will inform you of the refusal and the reasons for it within a reasonable time. If you still believe that your personal information held by us is incorrect then you have a right to submit a statement to us for placing with our records which refers to that belief.

What to do if you believe your privacy has been breached or you have a complaint about privacy issues

If you believe there has been a breach of the Act, the APPs or this policy, or you wish to make a complaint about our treatment of your personal information please contact our Privacy Officer by telephoning us on 1300 131 809 and asking for the Privacy Officer or by simply emailing privacy@apsbenefitsgroup.com.au.

We will respond to you within a reasonable time.

External dispute resolution

If you are dissatisfied with our response to a complaint, access request or correction request then you can seek a review of our decision by going to the Financial Ombudsman Service (FOS) by contacting 1300 780 808, completing a Dispute Form and posting it to FOS at GPO Box 3, MELBOURNE VIC 3001.

You may also complain to the Office of the Australian Information Commissioner by contacting 1300 363 992 or by post to GPO Box 2999, CANBERRA, ACT, 2601.

What is a reasonable time?

If this policy provides that we must respond within a reasonable time of a specific request by you, then we will respond within 30 days of your request unless we tell you that some longer period (not exceeding 90 days) is necessary because of the nature or complexity of the request.

Disclosure to overseas recipients

We do not generally disclose personal information to overseas recipients. If a particular circumstance arises which indicates desire or need for overseas disclosure, then we would seek your consent for any such disclosure.

Contacting us

If you have any queries concerning any aspect of this policy or our practices, please contact our Privacy Officer by telephoning us on 1300 131 809 and asking for the Privacy Officer or by simply emailing privacy@apsbenefitsgroup.com.au.