

Privacy Policy

CMT Financial Services Pty Ltd



ABN 61 162 109 373

Australian Financial Services License No 434 377

1 Overview

Protecting our clients' privacy is very important to us. To ensure our compliance with the Privacy Act and as part of our commitment to ensuring the safety of your private and confidential information, we have established and implemented this Policy.

1.1 Introduction

The Privacy Act requires that we handle your personal information in accordance with a set of national principles, known as the Australian Privacy Principles (APPs), which regulate the collection, use, correction, disclosure and transfer of personal information about individuals by organisations like us in the private sector.

1.2 Policy statement

The Policy explains our policies and practices with respect to the collection, use and management of your personal information and our approach to the APPs.

2 General obligations

2.1 Collection

2.1.1 What information do we collect?

We will collect and hold your personal information for the purposes of:

- providing advice, products and services to you
- managing and administering your products and services
- verifying your identity
- letting you know about our other products and services.

The type of information collected from you includes information that is necessary to operate your account or for us to provide advice or other services to you. We may ask you to provide personal information such as your:

- name
- e-mail address
- residential and/or postal address
- date of birth
- telephone number
- occupation
- bank account details
- financial details
- employer
- tax file number (TFN)

We may also collect personal information from you regarding your family situation, your partner, dependants, beneficiaries, and children, if it is considered necessary to provide you services, such as financial planning advice where members of your family may become beneficiaries to your life insurance policy or superannuation fund. If you provide us with personal information about another person, we expect and assume that you have that person's permission to provide this information to us and that you have made them aware that their personal information will be handled in accordance with this Policy.

This information is primarily collected from application forms you have completed, your use of our online facilities, or through ongoing communications with you or persons you authorise to communicate with us on your behalf.

There are circumstances in which we will ask for your consent to provide certain information such as:

- Health Information when you apply for insurance or from medical practitioners and other relevant professionals when you make a claim
- income information from employers when you apply for additional insurance protection or salary continuance insurance
- Health Information and other financial information to assess your eligibility for the early release of your super funds on grounds of severe financial hardship
- details of your dependants, as defined at section 10 of the *Superannuation Industry (Supervision) Act 1993* (Cth), to pay benefits in the event of your death.

We will inform you of any legal requirements for us to request information about you and the consequences of not providing that information. For example, in addition to the personal information we will obtain from you, whenever you acquire a new product or service from us, we will require documents evidencing your identity. Such evidence may include a certified copy of your driver's licence, passport or birth certificate. If you do not provide identity documentation, we may not be able to action your request.

We will solicit personal information about you where you have knowingly provided that information to us, we believe you have authorised a third party to provide that information to us, or we are obligated or authorised by law to obtain such information. Third parties that we may need to collect information from include your financial adviser, product issuer, employer, accountant or solicitor. To verify your identity for Know Your Customer (KYC) purposes, we may also solicit personal information about you from reliable identity verification service providers.

In order to identify opportunities to improve our products and services and to enhance your customer experience with us, we may also collect data from third parties. Prior to engaging any third party, a thorough due diligence process is undertaken to ensure your personal information is fully protected. This includes ensuring that sufficient security measures and relevant confidentiality and contractual arrangements are in place which, at a minimum, require the third party to handle personal information in strict accordance with our requirements under Australian privacy law.

2.1.2 What if you do not give us the information we request?

You are not obligated to give us the information that we request. However, if you do not give us the information that we ask for, or the information you give is incomplete or inaccurate, this may:

- prevent or delay the processing of your application or claim
- affect your eligibility for specified insurance cover
- preclude us from providing you financial advice
- prevent us from contacting you about your product or services
- impact the taxation treatment of your account.

For example, we are required to ask for your TFN when you become a member of one of our superannuation products. If you choose to not give us your TFN, you may be subject to higher tax charges on your superannuation, we may not be able to locate different accounts in your name, and we may not be able to accept personal contributions.

2.2 Use of information

2.2.1 How do we use the information that we collect?

We use your personal information for the purpose for which it has been obtained, and for related purposes. For example, we collect your personal information so that we are able to:

- provide financial advice to you
- establish and manage your investments and accounts
- implement your investment instructions
- establish and maintain insurance protection
- process contributions, transfer monies or pay benefits
- report the investment performance of your account
- prevent, detect and investigate a suspected fraud or crime
- address any queries or concerns you may have
- keep you up to date on other products and services that may be of interest to you
- improve the operation of our business and enhance the delivery of our products and services.

2.3 Disclosure

2.3.1 Who do we give your information to?

For the purpose of providing the services you have requested, we may provide your information to external parties. Where personal information is disclosed, we have strict controls in place to ensure information is held, used and disclosed in accordance with the APPs.

The types of external organisations to which we may disclose your personal information include:

- organisations involved in providing, managing or administering our products or services such as actuaries, custodians, external dispute resolution services, insurers, investment managers, product issuers, alliance partners or mail houses
- your financial adviser or other advisers appointed by you
- your employer (only if you have an employer sponsored superannuation arrangement)
- funds (administrators or trustees) to which your benefit is to be transferred or rolled over

- medical practitioners and other relevant professionals, where you have applied for insurance cover or made a claim for disablement benefit
- your personal representative, or other persons who may be entitled to receive your death benefit, or a person contacted to assist us to process that benefit
- financial institutions that hold accounts for you
- professional advisers appointed by us
- third party services, to enable us to deliver better products and services to you
- businesses that have referred you to us.

There are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Taxation Office or pursuant to a court order)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary to discharge obligations (such as for enforcement activities of regulatory bodies or to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

2.3.2 Will my information be disclosed overseas?

It is generally unlikely that we will disclose your personal information overseas. However, we may use third-party service providers or offshore outsourcing services to provide services to you.

Any overseas disclosure does not affect our commitment to safeguarding your personal information and we will take reasonable steps to ensure any overseas recipient complies with the APPs.

Where it is likely that we will transfer your personal information overseas, we will either seek your consent or inform you and ensure that appropriate contractual measures are in place requiring the overseas entity to protect your personal information in accordance with our obligations under Australian privacy law.

2.4 Access and correction of information

2.4.1 Can I access my information and what if it is incorrect?

You may request access to the personal information we hold about you. There may be circumstances where we are unable to give you access to the information that you have requested. If this is the case, we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

You have a right to ask us to correct any information we hold about you if you believe it is inaccurate, incomplete, out of date, irrelevant or is misleading. If we do not agree with the corrections you have supplied and refuse to correct the personal information, we will give you a written notice to that effect.

If you wish to access or correct your personal information, you may contact us through our offices or by writing to the Privacy Officer, whose contact details are set out in section 3.

2.5 Protection of personal and sensitive information that we hold

2.5.1 How do we protect the security of your information?

We have security systems, practices and procedures in place to safeguard your privacy. We may use cloud storage or third-party servers to store the personal information we hold about you.

2.6 Retention of your personal information

We are required by law to retain certain records of information for varying lengths of time and, in certain circumstances, permanently. Where your personal information is not required to be retained under law and is no longer required for the purpose for which it was collected, we will take reasonable steps to irrevocably destroy or de-identify it.

3 Roles and Responsibilities

The Super Focus Board is ultimately responsible for overseeing the Policy.

3.1 Contacting the Privacy Officer

You can contact the Privacy Officer by writing to:

Privacy Officer
Super Focus
PO Box 102
Geelong VIC 3220

Email: office@super-focus.com.au

Telephone: 03 5229 6882

3.2 Complaints and breaches

If you believe that we have breached the APPs by mishandling your information, you may lodge a written complaint addressed to the Privacy Officer, whose contact details are set out in section 3.

The Privacy Officer will respond to your complaint within 30 days of its receipt.

In the event that the Privacy Officer is unable to resolve your complaint, you may lodge a [Privacy Complaint](#) with the Australian Information Commissioner. For more information, please visit the [Australian Information Commissioner's website](#).

We are committed to helping you have control of your personal information and so it is our practice to take reasonable steps to notify you if we are aware that we have breached your privacy.

In accordance with the Notifiable Data Breaches Scheme, if your personal information is involved in a data breach that is likely to result in serious harm to you, we will notify you and the Australian Information Commissioner.