

Document Code:	Version:	Date Approved:
GPS - 004	4.0	October 2018
Policy Type:	Date of Review:	Approved by:
Group Policy Statement	June 2019	Rodd Cunico

Purpose

Independent Fund Administrators & Advisers Pty Ltd (ABN 28 081 966 243) (hereinafter referred to as “IFAA”) is committed to the protection of the information that it holds about you. This policy sets out the processes that IFAA has in place to protect your information. IFAA is the entity responsible for ensuring compliance with Privacy obligations.

This policy covers the collection, use, disclosure and security of your information. It also deals with how you can access and correct information that we hold about you and how you may make enquiries or complaints about how we manage the information that we hold about you.

Scope

This Privacy Policy applies to Independent Fund Administrators & Advisers Pty Ltd (IFAA) and specifically covers the privacy of personal information held in relation to:

- existing and prospective employees of IFAA
- Directors of IFAA clients;
- Gardior Pty Ltd (Gardior) employees and investor representatives; and
- Members of the general public visiting the Company’s website.

Policy

Our Legislative Obligation

IFAA is bound by the Australian Privacy Principles under the *Privacy Act 1988* (Privacy Act). The Australian Privacy Principles are a set of rules that organisations must comply with in managing personal information about individuals.

IFAA is required to comply with the requirements of the Privacy Act, which provides for a legislative framework governing the management of personal information held.

Specifically, IFAA is required to comply with the Australian Privacy Principles (APPs).

Availability of Privacy Policy

This Privacy Policy is publicly available on IFAA’s website at www.ifaa.com.au. A copy of the Privacy Policy may also be requested, free of charge, and will be issued within three days of the request.

To request a copy of the IFAA Privacy Policy:

- IFAA employees should contact IFAA Human Resources on (07) 3238 1200.
- Directors may request a copy of this Privacy Policy by contacting their respective IFAA Trustee Services Manager or Gardior Company Secretary or logging onto Director Online and accessing HR policies.

Personal Information that we hold and why we collect it

IFAA collects personal information about you for the following reasons. In relation to:

- Employees - IFAA collects personal information about you in order to administer your employment arrangements, including paying your wages or salary.
- Directors - IFAA collects personal information about you in order to administer your Directorship, including making payment of Directors fees and meeting regulatory obligations
- Gardior employees and investor representatives – IFAA collects personal information about you in order to provide services to Gardior.

The types of information that IFAA may collect about you are:

- in relation to IFAA employees - your name, contact details, next of kin, bank account details, tax file number, drivers licence details, police and background checks, gender, date of birth, place of birth, psychometric test results, qualifications, occupation and any health conditions or allergies.
- in relation to Directors - your name, date of birth, contact details, bank account details, tax file number, signatures, drivers licence details, bankruptcy and Police checks, details of relevant duties and interests, details of conflicts of interest (if any), details of knowledge and skills, details of fitness and propriety, results of Director and Board evaluations and travel profiles.
- Gardior employees – personal information required to support Gardior recruitment and selection processes and business operations.
- Gardior investor representatives – name and contact details.
- In relation to members of the general public – information relating to you that you provide to us directly through our websites or indirectly through the use of our websites or online presence such as ‘cookies’.

IFAA may collect information about you from any of the following:

- in relation to employees or prospective employees - the Australian Federal Police, First Advantage, recruitment agencies and psychometric testing providers.
- Gardior employees and investor representatives – from yourself.
- in relation to Directors - your nominating organisation and Insolvency and Trustee Service Australia.

IFAA will collect information from you by the completion of IFAA forms. For Directors, information will be collected by completion of external forms (i.e. Bankruptcy and Police check forms). For Gardior employees and investor representatives, by completion of forms and via email.

IFAA will only collect information about you where it is fair and lawful to do so. In relation to Directors, when we collect information from a person or organisation other than yourself, it is done because we are required to under superannuation legislation.

We will not collect more information than is required.

We will not collect information about you in an unreasonably intrusive manner.

We will notify you when we collect information about you, by requesting the completion of relevant forms.

From time to time we may receive unsolicited information from you. If this occurs we will:

- consider if we can retain it, and
- if we can retain it, we will hold and archive the information securely in accordance with this Policy.

You have the right to anonymity or the use of a pseudonym when dealing with us. However, if you request anonymity, we will not be able to disclose or discuss personal information we hold in relation to you, as personal identification is required to access personal information.

IFAA will only use and disclose the information we hold about you for the following purposes (primary purpose):

- for employees - administering your employment and meeting regulatory obligations (ATO PAYG reporting)
- Gardior employees and investor representatives – in order to provide services to Gardior.
- for Directors – administering your Directorship and meeting regulatory obligations (APRA and ATO reporting where required by legislation).

IFAA will not use your personal information for direct marketing by third party entities. IFAA will also not disclose information about you to other organisations for their marketing purposes.

IFAA will only disclose your personal information to an overseas recipient if required by legislation. In relation to Directors, limited personal information may be passed to overseas fund managers (for example, in relation to the completion of application or redemption forms).

IFAA may collect Government-related identifiers such as tax file numbers and driver's licences. We will not adopt these as identifiers unless we are authorised under legislation. We will disclose a Government-related identifier to a third party in the following circumstances:

- We are required by legislation for the purposes of taxation administration or other legislative requirements;
- We are required by a court order; or
- For enforcement related activities.

Data Integrity (Quality)

I FAA tries to ensure that the information that we hold about you is accurate, complete and up-to-date. We will do this by applying periodic checks for data quality, and updating information where required. We may also request that you review information we send you, so you can advise of any changes to personal information

Data Security

I FAA will ensure that the information that we hold about you is secure and is protected from misuse, interference and loss, or from unauthorised access, modification or disclosure.

We will do this by ensuring comprehensive policies and controls are in place relating to data security. This includes both comprehensive IT security arrangements as well as appropriate physical security arrangements. In combination, this will protect the security of personal information we hold.

If I FAA has determined that we no longer need the information about you, we will either securely archive or destroy the information, depending on the circumstances or policy to which the information relates.

Eligible data breach notification

When I FAA becomes aware of a breach of data security (ie. unauthorised disclosure, access or loss) in respect of your personal information, it will implement processes to assess the impact of the data breach.

In accordance with the requirements of the privacy legislation, I FAA will report eligible data breaches to the Office of the Australian Information Commissioner (OAIC) and affected individuals as soon as practicable after SCS becomes aware that there are reasonable grounds to believe that there has been an eligible data breach.

Access and correction of information

You are entitled to access the information that I FAA holds about you.

If you want to check that your personal details are correct or to see what personal information I FAA holds about you, you may request access to this information at any time.

Requests for information may be made in person, via the telephone or via email. A copy of the requested information can be sent by post.

In relation to employees, to correct your details, completion of an I FAA form may be required. In relation to Directors, updated information may be supplied via email, hard copy documentation, or advised at meetings.

For security reasons, I FAA will not give any information over the telephone unless the person making the enquiry is able to answer appropriate security questions to confirm their identity.

Written requests for information must be signed by you.

I FAA is not obliged to give you certain information if it:

- is confidential, or
- relates to another person.

If you request access, I FAA must respond to your request within a reasonable period (30 days) after you make the request. I FAA will endeavour to respond to such requests at the earliest opportunity. We must give you access in the manner you requested, except where it is unreasonable or impracticable to do so.

The Australian Privacy Principles (APP) regime provides that requests for access to personal information may be denied in limited circumstances. If I FAA refuses access (for example, giving access would have an unreasonable impact on the privacy of other individuals), we must advise in writing of:

- the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so, and
- the mechanisms available to complain about the refusal, and
- any other matters prescribed by the regulations.

IFAA will not charge you a fee for making a request or accessing information held about you.

IFAA may correct the information we hold about you if we believe it is inaccurate, out of date, incomplete, irrelevant or misleading. We may do this by applying internal procedures to update information.

If IFAA corrects information that we hold that we have also given to a third party (under approved means), if you request it, we will also ask that entity to correct the information held about you.

The APP regime provides that IFAA may refuse to correct the information we hold about you in limited circumstances. If we do that, we will advise you of:

- the reasons for the refusal except to the extent that, having regard to the grounds for the refusal, it would be unreasonable to do so, and
- the mechanisms available to complain about the refusal, and
- any other matters prescribed by the regulations.

If IFAA refuses to correct, you have the right to ask us to associate with the information a statement that you believe the information is inaccurate, out-of-date, incomplete, irrelevant or misleading. IFAA must then take such steps as are reasonable in the circumstances to associate the statement in such a way that will make the statement apparent to users of the information.

IFAA must respond to your request within a reasonable period (30 days) and we will not charge you for the making of the request, correcting the personal information or for associating the statement with the personal information. IFAA will endeavour to respond to such requests at the earliest opportunity.

Our Complaints Holding Process

IFAA takes complaints about privacy breaches seriously. We have established an internal complaints process which will consider any complaints made about breaches of privacy and attempt to resolve them promptly.

The internal complaints process is free to access.

If you have a complaint about a possible breach of privacy, then you should first contact the relevant Complaints Officer below, using any of the following methods:

- IFAA employees and prospective employees – Manager, Human Resources
- Directors – Assistant Trustee Services Manager
- Gardior employees and investor representatives – Gardior Company Secretary

In Writing	PO Box 10654 Brisbane Adelaide Street QLD 4000
In Person	Level 3 West Tower, 410 Ann Street Brisbane QLD 4000
By Phone	(07) 3238 1200
By Fax	(07) 3238 1277
By Email	info@ifaa.com.au

If you are not happy with a privacy issue and wish to make a complaint, you can do so in writing, over the phone or in person at the IFAA office. IFAA will address your concerns and try to resolve them quickly. IFAA aims to resolve any complaints as soon as possible but no longer than 30 days from the time of receipt.

If you are not satisfied with how we have handled your complaint, you may complain directly to the Office of the Australian Information Commissioner (OAIC). The OAIC has the power to investigate and resolve privacy complaints and may make a determination in respect of complaints.

You will not be charged a fee to make a complaint to the OAIC. Go to [oaic.gov.au/Privacy/Privacy Complaints/Making a privacy complaint](http://oaic.gov.au/Privacy/Privacy%20Complaints/Making%20a%20privacy%20complaint) for more information. Contact details of the OAIC are:

In writing	GPO Box 5218 Sydney NSW 2001
In person	Level 3, 175 Pitt Street, Sydney NSW 2000
By phone	1300 363 992
By fax	+61 2 9284 9666
By email	enquiries@oaic.gov.au

Rodd Cunico
Chief Executive Officer
October 2018