



Privacy Policy

We take your privacy seriously

Here are the ins and outs of our privacy policy. You can give us a shout any time if it doesn't make sense.

Our Commitment

We are committed to preserving your privacy and complying with the *Privacy Act 1988* and the Australian Privacy Principles.

Collection of Personal Information

Information We Collect From You

The main way we collect personal information from you is when you provide it to us. For example, when you:

- 1 – engage with a service we offer or invest in a product we promote
- 2 – make an enquiry about our services or the products we promote
- 3 – register your interest in receiving information about our services or the products we promote
- 4 – insert information into one of our forms
- 5 – ask to be placed on one of our mailing lists
- 6 – visit our website
- 7 – contact, register with, post to, like or follow any of our social media pages;
- 8 – register for our events
- 9 – participate in our competitions, promotions or surveys

The details of exactly what types of personal information we collect can be found in our disclosure documents, on our forms and website, and in the questions we ask when we communicate with you.

Information We Collect From Other Parties

We may also collect information about you from other parties such as your employer, your financial advisor, the Australian Taxation Office (ATO), another superannuation fund of which you are a member, clearing houses, credit reporting agencies and identification verification services.



Sensitive Information

We may collect sensitive information about you such as your health (for insurance purposes) but do not collect information about your race, religion, beliefs or sexual preference except where you have consented or where we are permitted or required by law to do so. Sensitive information will only be used for the purpose for which it was provided.

Holding and Retaining Your Personal Information

We take reasonable precautions to protect and secure your personal information from misuse, interference and loss, as well as unauthorised access, modification and disclosure.

Your personal information is stored electronically on secure systems provided by cloud service providers. Access to these systems is restricted and controlled via passwords, encryption and firewalls in line with Australian information security standards. Where your personal information is held in hardcopy form, these paper files are archived in a secure facility.

Access to your personal information is limited to those individuals or entities who require your information to perform a specific task or function.

Your personal information is only retained for as long as necessary to fulfil the purpose/s for which it was collected, unless we are required to retain the information for a certain period of time under an Australian law or court or tribunal order. Once no longer required, we take such steps as are reasonable in the circumstances to destroy or permanently de-identify your personal information.

Use of Personal Information

We use the personal information we have collected about you in order to:

- 1 – perform administrative and operational functions associated with providing you with access to our services and the products we promote;
- 2 – contact you to provide you with information about our services and the products we promote;
- 3 – contact you to conduct product and market research, surveys and other promotions; and
- 4 – comply with our legal obligations.



Each time we collect personal information from you we will explain to you:

- why we are collecting the information;
- how we intend to use it;
- whether we are likely to disclose your personal information to overseas recipients;
- the consequences if the personal information is not collected;
- how you may access and correct your personal information;
- how you can opt-out of having your personal information used (if appropriate); and
- how you can make a complaint about a privacy breach.

What Happens If You Choose Not To Provide The Information?

You do not have to give us your personal information. However, if you choose not to, we may not be able to provide you with information or access to our services or the products we promote.

Disclosure of Personal Information

We will not disclose information we collect about you to any third parties without your prior consent. Similarly, we will not sell any information we collect about you.

However, we may disclose personal information for the purpose specified to you at the time of collection or for other purposes if:

- you would reasonably expect us to disclose such information for that purpose;
- that purpose is related to the purpose specified to you at the time of collection; or
- where we are permitted or required by law, or it is in the interests of public safety to do so

For instance, we may disclose your personal information to:

- entities related to us that are part of our group of companies;
- service providers and contractors who are engaged to provide services to us and our group of companies;
- any third parties authorised by you to receive information held by us; and
- government, regulatory and law enforcement agencies as required, authorised or permitted by law.



Tax File Number

If you disclose your tax file number (TFN) to us, you authorise us, our related companies and our service providers and contractors, to store and use your TFN as authorised by law.

We use your TFN to establish and administer your account with Verve Super, to contact the ATO and other superannuation entities to find out if you have other super monies, to meet any requirements set by the ATO or other regulatory authorities, and for any other lawful superannuation purpose.

All information supplied to us is used and stored in accordance with this policy.

Due to the sensitivity of TFNs and the legal restraints on their use and disclosure, if you lose or forget your TFN, we will not be able to provide it to you. You will have to ask the ATO for a copy of it.

Disclosure Overseas

Some of our communications service providers are located outside of Australia, meaning your personal information may be disclosed to a recipient in other countries.

In addition, anonymised web traffic information is disclosed to third party analytics platforms when you visit our websites (who may store the information across multiple countries) and when you communicate with us through our social media applications, where the provider and its partners may collect and hold your personal information overseas.

We will not disclose your personal information to overseas recipients unless and until we have taken reasonable steps to ensure that the overseas recipient will handle your personal information in a manner consistent with the APPs, or you have consented to the transfer of the information.

Contact With You

If you provide us with your telephone number and email address, you agree and accept that Verve, or an agent or a related entity, may contact you via telephone, SMS or email. We will do this to facilitate action on your account, to confirm information, to gauge customer experience or for any other reasonable or marketing purpose. If you do not want this to happen, please email hello@vervesuper.com.au.



Direct Marketing

We may use your personal information to contact you with new information or offers for products or services from us and our partners. Your personal information will never be added to a general marketing database. We do not sell, rent or trade your personal information to or with third parties for the purpose of allowing them to send marketing material directly to you.

If you don't wish to receive marketing material, you may opt out by contacting us by selecting the Unsubscribe option or emailing us at hello@vervesuper.com.au.

Privacy on the Internet

The Internet is not a secure environment. If you use the Internet to send us personal information you do so at your own risk.

Website Cookies

We make use of "cookies" technology on our website. Cookies are small data files transferred onto your computer or electronic devices which tells us when you visited our website, the pages you visited and the information you downloaded. We use cookies to improve the functionality of our website and to learn more about the way that you interact with our content. Cookies are a feature of your Internet browser which you can disable at any time.

Remarketing

Our website uses the Google AdWords remarketing service and similar services from other providers to advertise on third party websites (including Google) to previous visitors to our site. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network, or other sites. Third-party vendors, including Google, may serve ads based on someone's past visits to our website.

Any data collected will be used in accordance with our own privacy policy, Google's privacy policy or the privacy policy of other remarketing services we use. If you would like to opt out of Google ad personalisation, please visit Google's [Ads Settings](#). If you would like to opt out of third-party ad personalisation, please visit the [Network Advertising Initiative opt out page](#).

Links to Other Websites

You may be able to access external websites, apps or platforms operated by third parties by clicking on links provided on our website. These links are provided for convenience and may not remain current or be maintained. In addition, these websites, apps and platforms aren't subject to our privacy standards and procedures.



Once you leave our website, our privacy policy no longer applies. You'll need to review these websites, apps and platforms directly to view a copy of their privacy policies and to ensure your personal information is protected.

Social Media Applications

Whilst we may use social networking platforms for communications, we won't ask you to supply personal information publicly over these platforms. Sometimes we'll invite you to send your details to us via direct message, for example, if you have made a complaint via social media and we need to know how to contact you.

Any personal information that you contribute to the publicly accessible sections of social media applications can be read, collected and used by other users of the application.

We have little or no control over these other users and cannot guarantee that any information that you contribute to any social media applications will be handled in accordance with our privacy standards.

Data Analytics

We may analyse customer information we hold against information we are permitted to use from external sources such as statistical data. Generally, this information is based on aggregated data that doesn't contain information that identifies individuals.

You Can Access and Correct Information

We take all reasonable steps to ensure that the personal information which we collect, use or disclose is accurate, complete and up to date.

If you think that the personal information that we hold about you is incorrect, please contact our Privacy Officer on 1300 799 482 or via email to hello@vervesuper.com.au. You can also request that certain personal information we hold about you be deleted.

We reserve our right to refuse your request for access to, or correction or deletion of, your personal information if, for example, we consider your request to be frivolous or vexatious, or if we are legally entitled to do so. If we refuse your request, we will give you our reasons in writing and information about how to make a complaint about the refusal.

When You Contact Us

We must be certain of your identity before we can discuss specific account details with you. If you contact us to discuss your account, you must be able to prove your identity. This ensures that we are able to protect your personal information by only giving it to you or someone who can prove that they are lawfully authorised to act on your behalf.



If you have a general enquiry that does not involve discussing your personal information, you do not have to provide identification. In these situations, you will be able to deal with us without identifying yourself.

Data Breaches

We are required by the *Privacy Act 1988* to notify you and the Office of the Australian Information Commissioner (OAIC) in the event of an eligible data breach occurring. For example, if a database containing your personal information is hacked or your personal information is mistakenly provided to the wrong person, and we have not been able to prevent the likelihood of serious harm to you because of the breach.

Our notification to you will be sent as soon as practicable and will contain:

- a description of the data breach;
- the kinds of information concerned; and
- the steps we have or will take to rectify the data breach; and
- recommendations about the steps you should take in response to the data breach.

Complaints Handling

If you are dissatisfied or have a complaint about our privacy practices, we encourage you to contact us to tell us about your complaint

Post: Complaints Officer, Verve Super
PO Box 777, Surry Hills NSW 2010

Phone: 1300 799 482

Email: hello@vervesuper.com.au

An acknowledgement will be issued to you within one business day of receipt of your complaint, either by phone, email or post. Our team will investigate and respond to all aspects of the matters raised in your complaint.

We will provide you with a response no later than 45 calendar days after receiving your complaint, unless another timeframe is allowed or required under the relevant legislation.

If you make a complaint and we resolve it within 5 business days from receipt, to your satisfaction, we are not required to send you a formal complaint response unless you request one, or your complaint relates to hardship, a declined insurance claim, the value of an insurance claim or for any decision of a trustee (or failure by the trustee to make a decision) relating to a complaint.

For death benefit objections, the Trustee must provide a complaint response no later than 90 calendar days after the expiry of the 28 calendar day period for objecting.



We will do our best to resolve your complaint as soon as possible. However, if we are unable to provide you with a response within the required timeframe, we will provide you with progress updates including reasons for the delay.

If you're not satisfied with our handling of your complaint or our decision, or if you did not receive a response within the required timeframe, you may be able to refer your complaint to the Australian Financial Complaints Authority (AFCA), an independent dispute resolution service established by the Government.

Post: Australian Financial Complaints Authority
GPO Box 3 MELBOURNE VIC 3001

Phone: 1800 931 678

Email: info@afca.org.au

Website: www.afca.org.au

Time limits may apply. Please act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires. Complainants are encouraged to pursue internal dispute resolution before making a complaint to AFCA.

More Information About Your Privacy Rights

If you would like more information about your privacy rights, you can contact the Office of the Australian Information Commissioner (OAIC).

Post: Office of the Australian Information Commissioner
GPO Box 5218 Sydney NSW 2001

Phone: 1300 363 992

Email: enquiries@oaic.gov.au

Website: www.oaic.gov.au

Updating Our Privacy Statement

We may revise or update our privacy statement occasionally by posting it on our website. The current version at the time we collect or use your personal information is the version that will apply.

Linked Privacy Statements

The Trustee: www.eqt.com.au/global/privacystatement

The Administrator: <https://www.apexgroup.com/privacy-policy/privacy-policy-australia/>