



# Statement of Privacy Policy

March 2014

Bastion Superannuation Solutions Pty Ltd (Bastion) has adopted this Privacy Policy to ensure that it handles private information, about individuals responsibly. The Privacy Policy may be amended from time to time.

It is important to Bastion that the individuals dealing with it are confident that Bastion respects their privacy and does not interfere with their privacy when handling this information.

Bastion abides by the Australian Privacy Principles (APPs) established under the Privacy Amendment (Enhancing Privacy Protection) Act 2012 (Cth).

## Information We Collect

Bastion and its appointed agents need to collect certain private and confidential information to be able to provide you with a quality self managed superannuation fund (SMSF) administration and consultancy service.

We need to collect personal information on individuals and in certain circumstances, information on companies and trusts. Typically this includes and individual's name, address, date of birth, gender, occupation, salary, tax file numbers, company registration details and other required information.

These records are essential to the proper management of your SMSF and to enable a SMSF to provide its members with superannuation benefits.

## Consequences of Not Providing Information

If the personal information requested for the provision of SMSF administration and consultancy services is not provided we will not be able to provide these services.

## Information Collection Policy

We will not collect any personal information about you except when you have knowingly provided that information to us or authorised a third party to provide that information to us. Generally, collection of your personal information will be effected via letter, face to face interviews, telephone, fax, email with you or from another party such as your financial planner, accountant, fund manager or other source.

In some circumstances such as the collection of health information for disability claim or insurance cover purposes it may be collected directly from the member.

From time to time additional and/or updated personal information may be collected through one or more of these methods. We will only collect, maintain and use personal information about you if it is necessary for us to adequately provide you with the services you have requested.

Additionally we may receive information regarding nominated beneficiaries of clients. At the time that this information is received we will assess whether approval from any individual concerned needs to be obtained for our office to hold this information.

## Information Disclosure

We will not use or disclose personal information collected by us for any purpose other than:

- the purposes for which it was provided or secondary related purposes in circumstances where you would reasonably expect such use or disclosure;
- where you have consented to such disclosure;

- where the Australian Privacy Principles authorise use or disclosure where required or authorised under law, in circumstances relating to public health and safety and in connection with certain operations by or on behalf of an enforcement body.

Typically your personal information may be disclosed for purposes related to the provision of SMSF administration and consultancy services to other service providers such as:

- your appointed SMSF Auditor;
- the insurers of the SMSF who provide death and disability cover for the SMSF members;
- your representatives or service providers such as your Accountant, Solicitor, Tax Agent, Broker, Stockbroker, Financial Planner or Banking Institution, provided we hold your authority to do so;
- Government authorities and other organisations when required by law in the providing of SMSF administration and consultancy services.

Should a SMSF member become a member of another Superannuation fund, their personal information may be transferred to that fund.

We are also obliged pursuant to the Corporations Act to maintain certain transaction records and make those records available for inspection by the Australian Securities and Investments Commission.

We may use the personal information collected from you for the purpose of providing you with direct marketing material, however you may, by contacting us request not to receive such information and we will give effect to that request. Please allow two weeks for your request to be actioned.

We may disclose your personal information to external contractors for the following purposes:

- audit of company accounts;
- provision of actuarial certificates
- legal, computer, accounting or other business support services including document storage, printing and collating companies; and

- compliance framework review.

It is a condition of our agreement with each of our external contractors that they adopt and adhere to this privacy policy. We will confirm with external contractors that they have systems and procedures for handling personal information in accordance with this policy. If you have any concerns in this regard, you should contact us by any of the methods detailed below. We will advise you of any change in business circumstances that may affect the handling of your personal information.

In the event that we propose to sell our business we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Any such disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them. In the event that a sale of our business is effected we may transfer your personal information to the purchaser of the business. As a client you will be advised of any such transfer.

### **Storage of Personal Information**

Your personal information is generally held in your client file. Your personal information is also held in a computer database. We will at all times seek to ensure that the personal information collected and held by us is protected from misuse, loss, unauthorised access, modification or disclosure. At all times your personal information is treated as confidential and any sensitive information is treated as highly confidential. All record movements off premises are recorded in a central register. After hours access to our premises is controlled by allowing only personnel with security passes to access the premises. All computer based information is protected through the use of access passwords on each computer. Data is backed up each evening and stored securely off site. In the event you cease to be a client of this organisation, any personal information which we hold about you will be maintained in a secure off site storage facility, and destroyed after an appropriate period of time that complies with legislative and professional requirements (usually 7-10 years).

## **Access to Your Personal Information**

You may at any time, by contacting us request access to your personal information and we will (subject to the following exceptions) provide you with access to that information either by providing you with copies of the information requested, allowing you to inspect the information requested or providing you with an accurate summary of the information held.

We will, prior to providing access in accordance with this policy, require you to provide evidence of your identity.

We will not provide you access to personal information which would reveal any confidential formulae or the detail of any in house evaluative decision making process, but may instead provide you with the result of the formulae or process or an explanation of that result. We will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person;
- providing access would have an unreasonable impact on the privacy of others;
- the request for access is frivolous or vexatious;
- the information is related to existing or anticipated legal proceedings between us, and would not be discoverable in those proceedings;
- providing access would reveal our intentions in relation to negotiations with you in such a way as to prejudice those negotiations;
- providing access would be unlawful
- denying access is required, or authorised by or under law;
- providing access would be likely to prejudice certain operations by, or on behalf of an enforcement body, or an enforcement body requests that access not be provided on the grounds of national security.

We will endeavour to respond to any request for access within 14 to 30 days depending on the complexity of the information and/or the request. If your request is urgent please indicate this clearly. In the event we refuse you access to your personal information, we will provide you with an explanation for that refusal.

## **Correction of Personal Information**

We will endeavour to ensure that, at all times, the personal information about you which we hold is up to date and accurate. In the event that you become aware, or believe, that any personal information which we hold about you is inaccurate, incomplete or outdated, you may contact us by any of the methods detailed below and provide to us evidence of the inaccuracy or incompleteness or outdatedness and we will, if we agree that the information requires correcting, take all reasonable steps to correct the information.

## **Credit Information Policy**

We will not seek any information regarding our clients from a credit reporting agency.

We retain credit information consisting a client's invoice history and any associated payments. We will not disclose your credit information to another party except in situations where an outstanding payment well exceeds our payment terms. In these situations we may engage the services of a debt collection agency. We would only disclose information that is relevant to the outstanding debt amount to the debt collection agency.

## **Complaints**

If you wish to complain about any breach or potential breach of this privacy policy or the Australian Privacy Principles, you should contact us by any of the methods detailed below and request that your complaint be directed to the Privacy Officer. Your complaint will be considered within 7 days and responded to. It is our intention to use our best endeavours to resolve any complaint to your satisfaction, however, if you are unhappy with our response, you are entitled to contact the Office of the Privacy Commissioner who may investigate your complaint further.

## **Internet Site**

The Bastion website may at times contain links to other Web sites whose operator may or may not adhere to a privacy policy or be governed by the Australian Privacy Principles. While it is not necessary to register your personal details to use our Web Site, we may in future offer a registration service, which will enable you to receive product and service updates, newsletters and other information. In the event you do register with us, we will collect personal information from you including your name and e-mail address. If you have registered with us and decide, at any time, that you do not wish to receive any further information from us, you can send an e-mail to the e-mail address noted below requesting to be removed from our online registration database. Please allow two weeks for your request to be actioned. You may amend or update your registration details by sending an e-mail to the e-mail address noted below providing your amended details. Please allow two weeks for your request to be actioned. Our website may use cookies, which would allow us to identify your browser while you are using our site. Cookies do not identify you, they simply allow us to track usage patterns so that we can measure the level of interest in various areas of our site. All browsers allow you to be notified when you receive a cookie and elect to either accept it or not. Your internet service provider should be able to assist you to set your preferences.

## **Additional Privacy Information**

Further information on privacy in Australia may be obtained by visiting the website of the Office of the Australian Information Commissioner at

[www.oaic.gov.au](http://www.oaic.gov.au)

The Australian Privacy Principles (APPs) can viewed in detail by visiting the following page on the OAIC website at

[www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles](http://www.oaic.gov.au/privacy/privacy-act/australian-privacy-principles)

## **Contact Details**

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