

Privacy Policy and Collection Statement

Applies to: Entity(s)	All (being the CareSuper Group)
Scope	All employees (including permanent, fixed-term or temporary), directors and officers, contractors, consultants and agents.
Author:	General Manager Compliance
Owner:	Chief Risk Officer
Approver:	Board
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1 Introduction

- 1.1 The purpose of this Policy is to enable the appropriate management of privacy and information for the CareSuper Group.

2 Purpose

- 2.1 This Privacy Policy and Collection Statement (**Policy**) explains how the Trustee collects, stores, uses and discloses personal information.
- 2.2 This Policy outlines the types of personal information we collect, why we need it, how the information is managed, the type of information held, how it will be collected, used and disclosed and for how long we keep your information.
- 2.3 The *Privacy Act 1988* (Cth) (**Privacy Act**) regulates the way in which organisations are required to handle your personal information, including your health information and tax file number. The Privacy Act contains 13 Australian Privacy Principles (**APPs**), which set out the requirements in relation to the collection, use, disclosure, quality and security of personal and sensitive information.
- 2.4 The APPs form part of the Trustee's procedures and policies and determine the way in which your member account will be administered and managed.

3 Definitions

The definitions outlined in this section applies to this Policy.

Term	Definition
APPs	Australian Privacy Principles
CareSuper Group	means the Trustee and its wholly owned subsidiary entities. To the maximum extent possible, if the Trustee Board approves a Governing Document, the corresponding governing body of the subsidiary entity must also adopt that document.
Executives	the executive team that is responsible for the day-to-day management of the Trustee's operations and implementation of policies and strategies set by the Board.
Fund	CareSuper (ABN 74 559 365 913)
Manager	a staff member holding the position of a manager or equivalent.
Privacy Act	<i>Privacy Act 1988</i> (Cth)

Trustee	CareSuper Pty Ltd (ABN 14 008 650 628)
	The Trustee holds a Registrable Superannuation Entity (RSE) licence granted by APRA and an Australian Financial Services (AFS) licence granted by ASIC and is the trustee of the Fund.

4 Roles and Responsibilities

4.1 Specific roles and responsibilities in terms of this Policy are shown below:

Role	Responsibility
Trustee Board	- ensures that appropriate resources are in place to implement this Policy; and - the approver of this Policy;
Risk and Compliance Committee	- reviews and recommends this Policy for the Trustee Board's approval; - monitors and reviews the on-going compliance with this Policy; and - has delegated the authority to the Owner for the day-to-day operational responsibility of this Policy.
Chief Risk Officer	- implements this Policy; - ensures controls are implemented across the business to support policy compliance; - considers requests for exemptions to this Policy; and - consults with the business as required.
General Manager Compliance	- accountable for document development and maintaining the content of this Policy; - establishes and drives stakeholder consultation and approval process; - consults with business stakeholders to assess any legislative or regulatory and risk profile changes that may impact this Policy; - reviews this Policy in line with its review schedule; and - develops associated procedures to ensure consistency with this Policy.
Executives	- review this Policy for impact to their business units or area of expertise; - offer active support for relevant CareSuper Group training initiatives relating to privacy to ensure a consistently high level of awareness is demonstrated by staff within their business units;

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- ensuring staff within their business units comply with this Policy;
 - undertake appropriate measures to address inappropriate conduct or policy breaches;
 - escalation of privacy risks or issues that relate directly to their business function; and
 - consult with the Owner, Author, General Manager Compliance as required.
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| All staff | <ul style="list-style-type: none"> • adherence to all principles as set out in this Policy; and • remaining vigilant and proactive in defence of data breaches and promptly reporting any potential or actual breaches. |
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5 Privacy Policy

- 5.1 This Policy applies to the Trustee as trustee of the Fund, and to each of the following companies, being companies which are wholly owned by the Trustee:
- CareSuper Advice Pty Ltd (ABN 78 102 167 877); and
 - CareSuper (Secretariat Co) Pty Ltd (ABN 29 104 826 413), (collectively referred to as the **CareSuper Group**).
- 5.2 For the purposes of this Policy, the Trustee and the wholly owned entities referred to above are collectively referred to as the 'CareSuper Group', 'we', 'us' or 'our'.
- 5.3 This Policy is designed to enable the Group to appropriately manage privacy and information matters and to provide individuals with information regarding how the Group handles and manages their personal information.
- 5.4 The Privacy Act regulates the way in which organisations, like the CareSuper Group, are required to handle your personal information, including your health information and tax file number. The Privacy Act contains 13 APPs, which set out the requirements in relation to the collection, use, disclosure, quality and security of personal and sensitive information. The APPs form part of the CareSuper Group's procedures and policies and determine the way in which your member account will be administered and managed.
- 5.5 This Policy applies to both members and non-members. For non-members, this Policy may apply in situations such as (but not limited to) when you browse our website, contact us, attend a CareSuper Group event, apply to become a member, enter a competition, or submit a job application with the CareSuper Group.

6 What is personal information?

- 6.1 Personal information refers to information or an opinion about an identified individual, or an individual who is reasonably identifiable from the information or opinion, even in circumstances when the information is not true. Personal information includes your name, address, date of birth and numeric identifiers like your CareSuper member number.

- 6.2 Personal information extends to sensitive information about an individual, such as health information, which can only be collected with the individual's consent. Your tax file number is also considered personal information and is subject to additional rules and requirements under superannuation and taxation laws.
- 6.3 The terms personal information and personal data are often used interchangeably when referring to privacy and within this Policy.

7 Protecting your privacy is important to us

- 7.1 This Policy outlines what details we keep about you, why we need this information and how we maintain your personal information in accordance with the Privacy Act and APPs.
- 7.2 You have the option of interacting with the CareSuper Group anonymously or by using a pseudonym. In such circumstances, we may provide you with general information about our products, services or processes. We won't, however, be able to provide you with any specific information (for example information about a specific account or member). This is because the provision of certain identifying information is required by law and/or for integrity purposes to provide access to products, services and features or to provide certain information.

8 Why we need your personal information

- 8.1 We may collect a range of personal information for the following purposes:
- establishing your account
 - identifying you, your beneficiaries, or any agents acting on your behalf
 - verifying your identity, including where required for legal, regulatory, fraud prevention or account security purposes
 - administering your super or other accounts with us, including managing your underlying investments, processing contributions to your account, paying or transferring your super benefits
 - assessing your eligibility for insurance or benefit claims
 - providing you with advice
 - providing you with information about super and other related services
 - complying with laws and reporting requirements and assisting government or law enforcement agencies
 - managing and resolving complaints made by you
 - research to improve products and services
 - conducting research and analytics related to the functions of the CareSuper Group
 - preventing, detecting and investigating suspicious or fraudulent activities

- assessing your job application if you apply for employment with us.

8.2 We may also collect personal information for related purposes such as:

- informing you of opportunities, special offers and promotions, potentially including marketing materials regarding the products or services of third parties
- research and feedback to improve the products and services available to you
- engaging with third-party service providers to assist in delivering direct marketing communications through various channels, including social media platforms and other digital means.

8.3 You can advise us at any time if you don't want us to use your personal information for the marketing and research purposes outlined above. This means that we won't advise you of opportunities and additional services available to you.

8.4 Where we use your personal information to contact you for marketing and research purposes, we'll give you the opportunity to opt out of any future direct marketing campaigns at the time of contacting you. You can opt out of receiving direct marketing communications at any time by updating your preferences in your online account settings or by reaching out to us using the contact information provided on our public website.

9 What kind of information we collect

9.1 The type of personal information we collect about you will depend on the products and services provided to you, but may include your:

- full name
- date of birth
- tax file number (**TFN**)
- identification documents (such as passport or driver licence), including document details and copies or images used to verify your identity
- contact details including address, phone number and email address
- residency and citizenship status
- employment details including salary
- details of your nominated beneficiaries
- financial information such as salary, contributions history, banking details, and your applications for benefit payments
- information about your investments, assets and liabilities, expenses, estate planning, insurances, income, and tax affairs
- legal information such as court orders, binding financial agreements, or arrangements arising from family law proceedings

- other information necessary to provide products and services to you.
- 9.2 Over time, this information may be supplemented by financial and other information necessary to administer your account. For example, changes to your investment options, amounts transferred into or out of your account or variations to your insurance.
- 9.3 We may also need to collect sensitive personal information about you, but only with your consent. For the purposes of the Privacy Act, sensitive information includes information about your health, racial or ethnic origin, political persuasions, biometric scanning, criminal record and religious or philosophical beliefs. Any sensitive information we collect about you will generally be limited to information about your health with regard to insurance eligibility assessments for either applications or claims. We won't use your sensitive information for any other purpose or share it with anyone else without your permission, unless we are required or authorised to do so under any applicable law.

10 Verifying your identity through the Document Verification Service

- 10.1 We may use the Australian Government's Document Verification Service (**DVS**) to assist in verifying your identity. The DVS allows us to confirm the details on your identity documents (such as your driver licence, passport or Medicare card) against the records of the issuing agency. We may use the DVS when you claim a benefit, consolidate or transfer your super, update certain account details, or where we otherwise need to confirm your identity to meet our legal obligations or where suspected fraud or unauthorised activity on your account requires us to re-verify your identity.
- 10.2 We collect and use your identification information in line with our obligations under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth), the *Identity Verification Services Act 2023* (Cth) and the *Identity Verification Services Rules 2024* (Cth), the Privacy Act, and the DVS Participation Agreement we have entered into with the Commonwealth. Before we use the DVS, we will ask for your express consent. You can choose not to consent, and you can ask us to verify your identity through an alternate process outside the DVS.
- 10.3 We require your consent to verify your identity through the DVS. If you do not wish to provide your consent, we have alternate processes available for verifying your identity, which may involve providing certified paper copies of your identity documents together with additional supporting documentation or information. These alternate processes may take longer to complete than verification through the DVS. If we are unable to verify your identity through the DVS or by these alternate processes, we may not be able to process a transaction (such as a benefit payment or rollover), or provide certain services to you, as further described in section 11 of this Policy.
- 10.4 If you have a concern about how we collect, use or disclose your identification information for the purposes of the DVS, you can contact us using the complaints process set out in section 25 (Making a complaint) of this Policy. The DVS Hub is operated and managed by the Attorney-General's Department as the Framework

Administrator, and more information about the DVS and how the Hub is managed is available at <https://www.idmatch.gov.au>.

11 Consequences of not providing your personal information

- 11.1 If your personal information is not provided to us to enable us to properly administer your account or benefits, certain consequences may follow. Examples of these consequences include:
- we may be unable to pay your benefit (or process some other requests) or there may be delays
 - we may be unable to accept some types of super contributions on your behalf
 - we may have difficulties in calculating your benefit
 - there may be difficulties and delays in processing any insured death, terminal illness or Total and Permanent Disability (TPD) benefit you may be eligible for
 - you may pay more tax than is necessary
 - we may experience difficulties in contacting you – which means you do not receive annual statements or other important communications and may get reported as a lost member and eventually your benefit may be transferred to the Australian Taxation Office (ATO).

12 How we collect your information

- 12.1 Where possible, we'll collect your personal information directly from you.
- 12.2 There may be occasions where we collect information from an authorised representative, third parties such as your employer or the ATO, and publicly available sources. If you attend an event sponsored or conducted by us, we may collect information about you from the organiser of the event or from our service providers involved in conducting the event.
- 12.3 Collection of information from you will occur when you contact us to request that we provide a product or service. We may continue to collect your personal information during the course of our relationship. Your communications with us may be monitored and recorded. This is so we can improve our products and services and to ensure compliance with our policies and procedures.
- 12.4 We collect personal information when you lodge forms such as membership application and change of personal details forms, if you send us documents containing personal information, or if you pass security checks and provide updates to your information either over the phone or in writing. We also collect your personal information when you update your details in our online member portal, Member Online.
- 12.5 If we don't have your personal information, including your name, date of birth, address, contact phone number, email address and TFN, these can be provided to us by your employer to enable us to accept, and process, your super contributions and maintain your account. We may also collect your personal information from the ATO, other superannuation trustees and other third parties where doing so is necessary for the

administration of your account or provision of benefits and services to you or is required or authorised by an applicable law.

- 12.6 Personal information may also be collected by the CareSuper Group through external service providers, including our group life insurer, MetLife Pty Limited (ABN 57 078 907 883, AFSL 238761) (**MetLife**). MetLife provides group life insurance to the Trustee for the benefit of Fund members. Read the MetLife Privacy Policy at the [MetLife website](#).

13 How we retain your personal information

- 13.1 We'll only retain your information for the minimum period of time required to facilitate the administration of your account and to ensure compliance with legislative requirements. To facilitate this, we've determined that:
- following the closure of a member account, all digital records will be held for a period of time in accordance with legislative and regulatory requirements and the CareSuper Group's data retention and disposal policies; and
 - subsequent to this period member information that's no longer required may be destroyed or de-identified as appropriate.
- 13.2 Where we collect identification information, including document details and copies or images of identification documents, we'll only retain that information for the period required to verify your identity, administer your account and comply with legislative and regulatory requirements. Identification information that's no longer required may be destroyed or de-identified in accordance with the CareSuper Group's data retention and disposal policies.

14 Disclosure of your personal information

- 14.1 We will only disclose your personal information to third parties for the purposes outlined in this Policy, for other purposes that we notify you of and/or obtain your consent to or for purposes that are required or authorised by an applicable law. Where personal information is disclosed to a third party engaged by us, we will ensure that the third party is subject to appropriate controls and restrictions regarding the use of that information.
- 14.2 The types of third parties to which we may disclose your personal information include:
- Insurer: MetLife
 - Direct Investment option provider: FNZ
 - printing and mailing companies
 - archiving companies
 - actuaries, accountants, auditors, legal advisers and regulators
 - insurance companies and underwriters

- medical practitioners and other service providers that assist us with the assessment of claims
- custodians and investment managers
- marketing and research companies
- organisations maintaining and providing our information technology systems and services
- service providers and other advisers appointed by us
- your spouse or former spouse, to the extent required by law
- a third party where authorisation has been provided by you
- your dependants, legal personal representative or power of attorney as appropriate
- any other superannuation fund to which your benefit is to be transferred or rolled over, or from which your benefit is to be transferred or rolled in to CareSuper, including the administrator of that fund
- government agencies including the ATO, Australian Prudential Regulation Authority, Australian Transaction Reports and Analysis Centre, Australian Securities and Investment Commission, Australian Financial Complaints Authority, Office of the Australian Information Commissioner, the Courts and any other bodies or persons where required by law.
- other financial institutions, for the purpose of detecting and assisting in the prevention of fraud and scams

14.3 Generally, we require organisations who handle or obtain personal information as service providers, to agree to comply with the Privacy Act, the APPs and this Policy.

14.4 Your personal information won't be used or disclosed for any purpose other than the purposes set out in this Policy without your consent, except where required or authorised by super, tax or other relevant law. For example, we're required to report certain information to the ATO for tax related purposes.

14.5 We may disclose information to a third party nominated by you, such as your financial planner, where authorisation has been provided by you.

14.6 We'll only disclose your sensitive personal information to a third party with your consent or where required or authorised by applicable law. However, without your consent, we may not be able to process your insurance application or assess your claim or may otherwise be limited in how we can assist you.

15 Disclosing information overseas

15.1 Member personal information provided to the CareSuper Group or its service providers may be disclosed to, or stored by, entities located outside Australia. This may include but is not limited to data and IT hosting organisations, reinsurers and other analytical

and administrative service providers. Disclosure of a member's personal information to an entity located outside Australia will only occur where:

- it is necessary for the purposes of administering Fund membership in accordance with the terms of this Policy;
- we've taken reasonable steps to ensure that the overseas entity is committed to protecting the individual's privacy and complies with the APPs (or a broadly equivalent foreign law or binding scheme that is substantially similar to the APPs);
- the disclosure of the information is required or authorised by or under an Australian law or a court/tribunal order; or
- we have obtained your consent for the specific disclosure or you request that we disclose the information to the overseas entity.

15.2 Overseas recipients may be located in a range of countries, including, but not limited to, Singapore, New Zealand, India and Malaysia. This information is accurate at the date on which this Policy is approved, based on the information available to the CareSuper Group. Reasonable steps have been undertaken to ensure the information is accurate. Due to business operational variations and circumstances this may be subject to change from time to time.

16 Quality of your personal information

16.1 We rely on accurate, complete and up-to-date personal information to provide you with products and services. We take steps to ensure that your personal information is complete and up-to-date by maintaining and updating personal information when you advise us that your personal information has changed, and/or by proactively seeking clarification of details as necessary.

16.2 If there are any changes to your personal information, we encourage you to advise us immediately so we can update your details.

17 How can I update my personal information?

17.1 We rely extensively on the accuracy of the personal information you or your employer(s) provide. If any of your details have changed, or if you have any concerns about the accuracy, completeness and/or relevance of your personal information, please contact CareSuper on 1800 005 166. You can also view and change some of your personal details by using our secure Member Online facility via our website caresuper.com.au.

18 How can I access my personal information held by CareSuper?

18.1 Under the APPs, you have a right to know what personal information we hold about you and to obtain access to it or correct it, free of charge. You may access your information via:

- Member Online
- Phoning CareSuper on 1800 005 166

- Writing to GPO Box 157 Hobart TAS 7001

18.2 The Privacy Act provides limited circumstances in which some or all access to your information may be denied. If this applies to you, we will explain this to you when you ask for your information.

19 Your privacy and the internet

19.1 While all reasonable steps are taken to protect your personal information provided through the internet, you should be aware that there are general risks associated with transmitting personal information through the internet. You should assess these potential risks before deciding whether to use our online services. If you don't want to transmit personal information over the internet you may provide information to us by mail, phone or in person.

20 What information do we collect?

20.1 The general and personal information collected online depends on how you use the CareSuper website.

20.2 If you visit an unsecured area of the website to read or download information, our service provider will log information for statistical purposes.

20.3 We'll try not to identify users or their browsing activities or merge this with personally identifiable information. An exception is, in the event of an investigation, a law enforcement agency may exercise a warrant to inspect the service provider's logs.

20.4 Interactive tools on the website, such as calculators, often require you to provide personal information. We only retain this information where a calculator or similar tool allows you to save information and retrieve it at a later time. The information stored won't ordinarily be viewed by us.

20.5 Any personal information collected through the Mobile App is managed in accordance with this Policy.

20.6 We may also use automated tools to analyse online information and help improve our website, services and the information we provide.

21 Use of Artificial Intelligence

21.1 We may use approved artificial intelligence (**AI**) and automated tools to support our services, operations and interactions with you. This may include analysing information to improve our services, enhance user experience and provide more relevant information.

21.2 We take reasonable steps to ensure appropriate human oversight where AI is used. AI is used to support human judgement, and we seek to ensure that decisions with legal or significant effects on individuals are subject to appropriate human oversight and accountability.

21.3 We take reasonable steps to identify and manage risks associated with the use of AI and automated tools, with oversight and controls proportionate to the nature and risk of the use.

22 How we handle email

- 22.1 If you provide us with your email address, we may use it to send regular communications such as updates on new and existing products and services (including products or services of third parties). If you don't want to receive such information, you can click the unsubscribe link within the email you received, or you can contact us to unsubscribe at any time.
- 22.2 We'll preserve the content of any email that you send us, if we believe we have a legal requirement to do so. Your email content may be monitored for security issues, including where email abuse is suspected. Our response to you may be monitored for quality assurance purposes.

23 Cookies and similar technologies

- 23.1 Cookies are small text files that are sent to the user's browser to allow the web page browser to retrieve information from the computer. Cookies can either be temporary session cookies or stored permanently on a computer. We use traditional web browser cookies and similar technologies such as tracking pixels.
- 23.2 We use cookies and similar technologies on our websites to obtain information regarding the use of the website and to tailor the information we present to you. This may include information such as browser type, device type, pages visited and how you use the website. Some technologies may operate when the website first loads. By using the website, you agree to our use of this type of technology.
- 23.3 We use cookies and similar technologies from approved third-party service providers to support website functionality, analytics and advertising, and to customise your experience on other sites. These providers may include services such as Google, Meta, LinkedIn and other advertising, analytics, website optimisation, accessibility and customer feedback providers that we may use from time to time. These providers may receive limited information about how you use our website, such as browser type, device type and pages visited. This information does not directly identify you. If you want to limit tracking, you can block trackers using your browser settings, a privacy add-in tool or other available privacy controls. Some providers may also offer advertising preferences or opt-out options directly, while others may not provide a direct opt-out mechanism. The options available to you may vary depending on the provider and technology used.
- 23.4 The CareSuper website uses Google Analytics in order to understand the demographics and interests of website users. Google Analytics is a service which transmits website traffic to Google servers in the United States. By using the CareSuper website, an individual consents to the use and collection of data by Google in accordance with Google's Privacy Policy available at <http://www.google.com/intl/en/policies/privacy/> and for the purpose set out above. An individual can opt out of Google Analytics by disabling or refusing the cookie or by using the opt-out service provided by Google at <https://tools.google.com/dlpage/gaoptout>.
- 23.5 We, and third-party vendors, may at times combine cookies and similar technologies with analytics and measurement tools to collect information about your interactions

with our website, digital properties, and communications. This information may be used to monitor and improve website performance, understand visitor behaviour and preferences, personalise content and experiences, measure engagement and conversion activities, evaluate the effectiveness of advertising and marketing campaigns, generate audience insights, support research and reporting activities, and inform the development and improvement of our products and services.

23.6 We use similar technologies in emails to understand whether emails are opened or links are clicked. This information is used to improve our communications and is generally limited to overall usage information.

23.7 If you're concerned about cookies, you should be able to adjust your computer settings so that cookies will be rejected, however, this means that you may be unable to view secure pages.

24 Links to other websites

24.1 Our website has links to other internet sites.

24.2 These are provided as a convenience to you. We make no warranties and accept no liability in relation to the material contained on any linked external websites.

24.3 This Policy only applies to the CareSuper Group and doesn't extend to the websites of other companies or organisations to which our website is linked. We encourage you to read the relevant privacy policies or terms and conditions governing these linked sites to ensure that your privacy is protected.

25 Making a complaint

25.1 If you consider that any action by us breaches this Policy, the Privacy Act (including the APPs), or otherwise doesn't respect your privacy, you can make a complaint.

25.2 For information on how we handle your personal information, or if you'd like to complain about a possible breach of privacy, contact us in one of the following ways:

Postal address	Complaints Officer CareSuper GPO Box 1547 Hobart TAS 7001
Phone	1800 005 166
Email	complaints@caresuper.com.au

25.3 We will commence an investigation into your complaint. You will be informed of the outcome of your complaint following completion of the investigation. We will endeavour to notify you of the outcome of the complaint within 30 days of you notifying us of the complaint.

25.4 If you're not satisfied with our response to your privacy complaint, you can refer the matter to the Office of the Australian Information Commissioner. Their contact details are:

Postal address	Office of the Australian Information Commissioner GPO Box 5218
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	Sydney NSW 2001
Phone	1300 363 992
Email	enquiries@oaic.gov.au
Website	oaic.gov.au

26 Review of this Policy

26.1 This Policy will be reviewed and updated by the Trustee from time to time.

26.2 If the Policy is varied, an updated version will be posted on the CareSuper website.
Please check the CareSuper website regularly to ensure that you have the most recent version of the Policy.

26.3 This Policy was last updated on 26 August 2026.

27 Document history

Version	Reason for amendment	Date approved	Approved by
1.0	First version	17/10/2024	Board
2.0	Updates following scheduled review	11/03/2026	Board
3.0	Ad-hoc review. Updates to reflect the Document Verification Service requirements, use of Artificial Intelligence, and tracking pixels and similar technologies	26/08/2026	Board