

# Privacy Policy

## 1. About this Privacy Policy

This Privacy Policy (Policy) describes how your personal information, including sensitive information, is collected and handled by Colonial First State (CFS). This policy describes how we handle your personal information.

In this Policy, “we”, “us” or “our” means CFS.

This Policy is also relevant to any Privacy Collection Notices which we may separately provide to you, for example in connection with our products and services.

Depending on which products or service you apply for, or obtain, from us, and whether you do so directly or with the support of a third party (e.g. financial advisers), some or all of this Policy may be relevant to you. However, it is also possible that a privacy statement or policy of any such third party will also be relevant to you.

As a result, you should also refer to the privacy policy or statement of the relevant third parties for information in relation to their collection, use and disclosure of your personal information. This Policy does not cover the collection, use and disclosure of your personal information and data by third parties.

We, our directors, officers, employees or agents are not responsible for the collection, use and disclosure of your personal information and data by third parties (other than to the extent we expressly set out in this Policy).

This Policy governs all personal information collected by and provided to us and must be adhered to by all persons who access, use, process, control or otherwise deal with personal information on our behalf. This policy applies to independent contractors and job applicants, as well as individuals who provide us with personal information.

## 2. About us

This Policy is issued by CFS. CFS consists of Superannuation and Investments HoldCo Pty Limited ABN 64 644 660 882 and its subsidiaries, which includes Avanteos Investments Limited ABN 20 096 259 979 and Colonial First State Investments Limited ABN 98 002 348 352.

CFS provides investment, superannuation, and retirement products to Australians.

## 3. How we handle your personal information

We are bound by the *Privacy Act 1988* (Privacy Act), including the Australian Privacy Principles (APPs) and we recognise the importance of ensuring the confidentiality and security of your personal information.

We understand that your privacy is important to you, and we value your trust. That is why we protect your information and are clear and open about what we do with it.

During your relationship with us, we may tell you more about how we manage your information – for example, when you fill in an application form, receive product disclosure statements or access CFS portals. You should always read these documents carefully.

From time to time we update this Policy. You can always find the most up-to-date version on our website.

## 4. What information do we collect from you and others?

### Information we collect from you

We collect information about you when you use our products or services or deal with us. We may also collect information about you from other people and organisations.

#### Information we collect from you

We collect personal information about you when you contact us, use our products or services, visit our websites, use our mobile apps or deal with us in some other way.

The information we collect from you may include:

- **Information about your identity** – including your name, address, date of birth, gender, marital status, occupation and industry.
- **Your Tax File Number or tax residency status.**
- **Health Information** – for example, medical reports from your doctor for insurance purposes.
- **Financial and transaction information.**
- **Salary information.**
- **When you visit our websites or use our mobile apps** – your login information (username and/or password), location information, online identifier (IP address, cookies), mobile device and network information, and any third-party sites you access. For more information about how we do this, please refer to our Terms and Conditions.
- **Your contact details** – including your phone number and email address.
- **Personal Information of your family members, dependants and beneficiaries** - In some instances you will provide us with the personal information of other individuals (such as your nominated beneficiaries). If this happens, it is your responsibility to: (a) tell these individuals that you have provided their details to us and (b) provide them with a copy of CFS's Privacy Policy.

- **Other government Identifiers** - Medicare number.
- **Communications** (chat logs, phone record).
- **Other personal information**, such as details of your interactions with us.
- **Recruitment information:** information provided in your resume when you apply for employment with us and reference information.

### Information we collect from others

We collect information about you from others, such as:

- Service providers.
- Agents.
- Adviser.
- Brokers.
- Employers.
- Companies or bodies that you own shares in or have an interest in.
- Medical professionals (if you apply for life or income protection, we might ask you or your doctor for medical information).

### Sensitive information

The Privacy Act protects your sensitive information – such as information about your religion, ethnicity, health, or biometrics (for example, your fingerprints). If we need this type of information, we'll ask for your permission – except where otherwise allowed by law.

## 5. How we use your information

We are careful about how we use your information. We use it to deliver our products and services. We also use your information for other reasons, such as to better understand you and your needs, and to let you know about other products and services you might be interested in. We collect, use and exchange your information so we can:

- Confirm your identity when you join and during your relationship with us.

- Assess your application for a product or service.
- Design, manage, price and provide our products and services.
- Manage our relationship with you.
- *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth)- which requires your identity to be established and verified.
- Minimise risks and identify or investigate fraud and other illegal activities.
- Help you access your account securely, for example via the use of multi-factor authentication.
- Contact you, for example, when we need to tell you something important.
- Improve our services to you and your experiences with us.
- Contact you when we may owe you compensation or remediation.
- Comply with laws and assist government or law enforcement agencies.
- Manage our businesses.
- Contact your dependants in the event of your death as directed.
- Employment applications: to allow us to process any employment applications that we receive.

We may also collect, use, and exchange your information for other reasons where the law allows or requires us.

## Bringing new products and services

From time to time, we may also use your information to tell you about products or services we think you might be interested in. To do this, we may contact you by:

- Email.
- Phone.
- SMS.
- Social media.
- Advertising through our apps, websites or third-party websites.
- Mail.

To manage your communication preferences, for example, if you don't want to receive direct marketing messages or want to change your contact preferences, visit our website to log in to your CFS account and click on 'Communication Preferences'.

## Using data to give you better customer service

We're always working to improve our products and services and give you the best customer experience.

New technologies let us combine information we have about you and our other customers, with data from other sources, such as third-party websites or the Australian Bureau of Statistics. We analyse this data to learn more about you and other customers, and how to improve our products and services.

We sometimes use this combined data to help other businesses better understand their customers. When we do, we don't pass on any personal information about you.

## 6. Who we share your information with

We may share your information with third parties for the reasons outlined in this policy or where the law otherwise allows or requires. These third parties can include:

- Service providers – for example, our product distributors and Electronic Know Your Customer (eKYC) providers, including credit reporting agencies. eKYC is a digital process used by CFS to verify your identity remotely.
- Businesses who do some of our work for us – including direct marketing, statement production, and IT support.
- Brokers, agents, advisers, and people who act on your behalf – such as a person with Power of Attorney.
- Third parties on your behalf for the purpose of establishing and administering your products and services.
- A Legal Personal Representative (LPR), which means the executor or administrator of your estate who is legally authorised to represent

you when required, for example to represent a deceased individual.

- Organisations involved in our funding arrangements – like investors, advisers, researchers, trustees, rating agencies and investment managers.
- People who help us process claims – like assessors and investigators.
- Other banks and financial institutions – for example you may be able to view your CFS account on Commonwealth Bank’s NetBank.
- Auditors, insurers, and reinsurers.
- Current or previous employers – for example, to confirm your employment.
- Government and law enforcement agencies or regulators.
- Organisations that help identify illegal activities and prevent fraud.
- Other people using the same account.
- If you die while you are a member, we may share details about your super and insurance with your dependants as appropriate. The information we share may include the names of your nominated beneficiaries, your account balance, and any insurance amount payable.
- An Eligible Person (per the meaning in the Family Law Act 1975) for example Family Law matters.

## Sending information overseas

Sometimes, we may send your information overseas, including to:

- Service providers or third parties who store data or operate outside Australia.
- Complete a transaction.
- Comply with laws and assist government or law enforcement agencies.

If we do this, we make sure that there are arrangements in place to protect your information.

## 7. Keeping your information safe

Our staff are trained in how to keep your information safe and secure. We use secure systems and buildings to hold your information. We

aim to only keep your information for as long as we need it.

We store your hard copy and electronic records in secure buildings and systems or using trusted third parties. Here are some of the things we do to protect your information.

What	How
Staff Training	We train our staff in how to keep your information safe and secure.
<b>Secure handling and storage</b>	When we send information overseas or use third parties that handle or store data, we put arrangements in place to protect your information.
<b>Building Security</b>	We use a mix of alarms, cameras, guards, and other controls in our buildings to prevent unauthorised access.
<b>System security</b>	<p>When you log into our websites or apps, we encrypt data sent from your computer to our systems so no one else can access it.</p> <p>We have firewalls, intrusion detection and virus scanning tools to stop viruses and unauthorised people accessing our systems.</p> <p>When we send your electronic data to other organisations (when absolutely required), we use secure networks and/or encryption.</p> <p>We use passwords, two-factor authentication and/or smartcards to stop unauthorised people getting access.</p> <p>We have a multilayered approach to securing our services and your data and</p>

What	How
	continually monitor and evolve as the threat landscape changes.
<b>Destroying or de-identifying data when no longer required</b>	We aim to keep personal information only for as long as we need it – for example for business or legal reasons. When we no longer need information, we take reasonable steps to destroy or de-identify it.

## 8. Accessing, updating, and correcting your information

You can contact us and ask to view your information. If your information isn't correct or needs updating, let us know straight away as it's important that we have your correct details, such as your current home and email address and phone number. You can check or update your information by visiting our website to log in to your account or by calling one of the contact numbers found in section 10.

### Can you see what information we have?

You can ask us for a copy of your information, like your transaction history, by going online or calling us.

### Is there a fee?

There is no fee charged to you for the time spent on the administration of your information request.

### How long will it take?

We try to make your information available within 30 calendar days after you ask for it. Before we give you the information, we'll need to confirm your identity.

## Can we refuse to give you access?

In some cases, we can refuse access or only give you access to certain information. For example, we might not let you see information that is commercially sensitive. If we do this, we'll write to you explaining our decision.

## Updating your information

It is important that we have your correct details, such as your current home and email addresses and phone number. You can check or update your information by logging into our website at

<https://www.cfs.com.au/personal.html> or by contacting us (see section 10 for ways to contact us).

## Can you correct or update your information?

You can ask us to correct or update any information we have. See **Section 10** for ways to contact us. If we've given the information to another party, you can ask us to let them know it's incorrect. We won't charge a fee for this.

## What if we believe the information is correct?

If we don't think the information needs correcting, we'll write to let you know why. You can ask us to include a statement with the information that says you believe it's inaccurate, incomplete, misleading, or out of date.

## 9. Making a privacy complaint

If you have a concern or complaint about your privacy, let us know and we will try to fix it. If you are not satisfied with how we handle your complaint, there are other things you can do.

## What to do if you have a complaint

We recognise that even in the best run organisations things can go wrong. If you have a complaint, please tell us so we can fix the problem. Most complaints can be resolved promptly. If your complaint cannot

be resolved quickly, we will investigate the complaint, answer your questions, and do all we can to resolve the situation to your satisfaction.

To make a complaint, contact one of our staff or our CFS Customer Service Team. We'll investigate the issue and try to fix it straight away. Please refer to section 10 for information on how to contact us if you have a complaint.

In resolving your complaint, we will:

- Acknowledge your complaint and make sure we understand the issues.
- Record your complaint and investigate the matters raised.
- Do what we can to fix any problems.
- Keep you informed of our progress.
- Give you a reference number and contact details so that you can follow up at any time.
- Provide a written resolution letter which explains our investigation, decision, and reasons for our decision.

Further information can be found in our Complaints Policy which is available at [www.cfs.com.au/complaints](http://www.cfs.com.au/complaints)

## What else can you do?

If at any time you are not satisfied with the handling your complaint or the resolution we have provided, you can lodge a complaint with the **Australian Financial Complaints Authority (AFCA)**. AFCA provides fair and independent financial services complaint resolution that is free to consumers. You can contact AFCA by:

Website: [www.afca.org.au](http://www.afca.org.au)

Phone: 1800 931 678 (free call)

Mail: Australian Financial Complaints Authority,  
GPO Box 3, Melbourne VIC 3001

Note: To allow AFCA to easily identify us, please quote our membership number: 10318.

Time limits may apply to lodge a complaint with AFCA so you should act promptly or otherwise consult the AFCA website to find out if or when the time limit relevant to your circumstances expires.

If your complaint is about how we handle your personal information, you can also contact the

## Office of the Australian Information Commissioner.

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

Phone: 1300 363 992

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

## 10. We're here to help

If you want to ask a question, update your personal information, make a correction, have a privacy concern or general complaint or if you need more information, or want to update your preferences – help is just a phone call, or a few clicks away.

Product	How
<b>FirstChoice Members</b>	<i>Call: 13 13 36 - Monday to Friday, 8:30am to 6pm (Sydney time)</i> <i>Overseas: +61 2 8397 1100</i> <i>Email: <a href="mailto:contactus@cfs.com.au">contactus@cfs.com.au</a></i> <i>Mailing Address: Reply Paid 27 Sydney NSW 2001 or GPO Box 3956 Sydney NSW 2001</i>
<b>First Wrap Members</b>	<i>Call: 1300 769 619 - Monday to Friday, 8:30am to 6pm (Sydney time)</i> <i>Overseas: +61 3 8518 8420</i> <i>Email: <a href="mailto:firstwrap@cfs.com.au">firstwrap@cfs.com.au</a></i> <i>Mailing Address: Locked Bag 3460, GPO Melbourne VIC 3001</i>
<b>Essential Super Members</b>	<i>Call: 13 40 74 - Monday to Friday, 8:30 am to 6pm (Sydney time)</i> <i>Overseas: +61 2 9303 3000</i> <i>Email: <a href="mailto:contactessentialsuper@cfs.com.au">contactessentialsuper@cfs.com.au</a></i> <i>Mailing Address: Reply Paid 86495 Sydney NSW 2001 or GPO Box 3912 Sydney NSW 2001</i>
<b>Employer Super</b>	<i>Call: 1300 654 666 - Monday to Friday, 8:30am to 6pm (Sydney time)</i> <i>Overseas: +61 2 8397 1100</i> <i>Email: <a href="mailto:employer@cfs.com.au">employer@cfs.com.au</a></i>



Product	How
	<i>Mailing Address: Reply Paid 27 Sydney NSW 2001 or GPO Box 3956 Sydney NSW 2001</i>
<b>CFS Edge Members</b>	<i>Call: <b>1300 769 619</b> - Monday to Friday, 8:30am to 6pm (Sydney time)</i> <i>Overseas: <b>+61 3 8518 8420</b></i> <i>Online: via 'Click to Chat' or the webform on the 'Contact us' page at cfs.com.au/cfsedge</i> <i>Mailing Address: Locked Bag 20130 Melbourne VIC 3001</i>
<b>Everyday Investing</b>	<i>Call: 02 9197 3070 - Monday to Friday, 8:30am to 6pm (Sydney time)</i> <i>Overseas: <b>+61 2 8397 1100</b></i> <i>Mailing Address: Reply Paid 27 Sydney NSW 2001 or GPO Box 3956 Sydney NSW 2001</i>

If you're deaf or hard of hearing or have difficulty speaking, please contact:

National Relay Service

TTY/Voice: **133 677**

SSR: **1300 555 727**

Website **relayservice.gov.au**

For more information about the Australian Privacy Principles or the *Privacy Act 1988* refer to:

The Office of the Australian Information Commissioner (OAIC) Website **[www.oaic.gov.au](http://www.oaic.gov.au)**