

# ITP SMSF

## Privacy Policy

### About this policy

USAVE SMSF Pty Ltd ACN 606 860 913 trading as ITP SMSF provides self-managed superannuation and other services to its customers. The Privacy Act 1988 requires entities bound by the Australian Privacy Principles to have a privacy policy. This privacy policy outlines the personal information handling practices of the ITP SMSF. This policy is written in simple language. The specific legal obligations of the ITP SMSF when collecting and handling your personal information are outlined in the Privacy Act 1988 and in particular in the Australian Privacy Principles (APPs) found in that Act.

ITP SMSF will update this privacy policy when our information handling practices change. Updates will be publicised on our website.

### Overview

ITP SMSF collect, hold, use and disclose personal information to carry out functions or activities performed by ITP SMSF. These functions and activities include providing advice on self-managed superannuation and other related services.

### Collection of your personal information

At all times ITP SMSF will try to only collect the information we need for the particular function or activity we are carrying out. The main way ITP SMSF collect personal information about you is when you give it to us and through your interaction with us, for example, when you contact us to ask for information (but only if we need it), when you request or use our products or services, or when you telephone us or use any of our websites or mobile applications.

If we open a file about your matter, the information we collect from you may include your identity, gender and marital status, financial information and contact details.

### Collecting sensitive information

ITP SMSF do not usually seek sensitive information. This might include information about your health, racial or ethnic origin, political opinions, association memberships, religious beliefs, sexual orientation, criminal history, genetic or biometric information. ITP SMSF will, when necessary, obtain your explicit consent to collect and use such information.

### Indirect collection

ITP SMSF collect information about you from others such as the ATO, the Office of State Revenue (OSR) or the Australian Securities and Investments Commission (ASIC). We also collect personal information from publicly available sources, for example from public registers, or made available by third parties.

### Anonymity

Where possible, we will allow you to interact with us anonymously or using a pseudonym. For example, if you contact our enquiries line with a general question we will not ask for your name unless we need it to adequately handle your question.

However, for most of our functions and activities we usually need your name and contact information and enough information about a particular matter to enable us to fairly and efficiently handle your inquiry, request, or to provide a service to you.

### **Collecting through our websites**

ITP SMSF has its own website – [www.itpsmsf.com.au](http://www.itpsmsf.com.au). Where our website allows you to make comments or enquiries we collect your email address and sometimes other contact details. We may use your email address to respond to your enquiries or comments.

### **Analytic, session and cookie tools**

ITP SMSF may use a range of tools provided by third parties, including Google and Bing, to collect or view website traffic information. These sites have their own privacy policies. We may also use cookies and session tools to improve your experience when accessing our website. The information collected by these tools may include the IP address of the device you are using, information about the site that the IP address came from, the pages accessed on our site and the next site visited. We use the information to maintain, secure and improve our website and to enhance your experience when using it.

### **Social Networking Services**

The ITP SMSF website may host other social media applications such as Twitter, Facebook, Google+, LinkedIn, Pinterest, YouTube, blogs, forums, wikis, and or services that allow you to share content with other users. Any personal information or other information that you contribute to any Social Media Application can be read, collected, and used by other users of that Social Media Application over whom we have little or no control.

### **Electronic forms**

ITP SMSF use an electronic forms service to enable you to lodge enquiry online. When you submit one of these forms it is sent to an email account managed ITP SMSF where it is encrypted and stored in a secure environment.

### **Email lists**

ITP SMSF collect your email and, if you provide it, other contact details when you subscribe to our email lists. We only use this information for the purpose of sending you regular updates on the activities of ITP SMSF, and to administer the lists.

### **Use of your personal information**

ITP SMSF collect, use and exchange your information so that we can perform the particular function or activity we are carrying out. They include:

- Establishing your identity;
- Pricing and designing our products and services;
- Administering our products and services;
- Managing our relationship with you;
- Managing our risks and help identifying and investigate illegal activity;
- Conducting and improving our businesses;
- Improving the customer experience;
- Complying with our legal obligations and assisting government and law enforcement agencies;
- Identifying and telling you about other products or services that we think may be of interest to you.

### **Third Parties**

ITP SMSF may exchange your personal information with third parties where permitted by law so that we can perform the particular function or activity we are carrying out, including government and law enforcement agencies or regulators, and entities established to help identify illegal activities and prevent fraud.

We may also collect, use and exchange your information in other ways where permitted by law.

### **Direct Marketing**

If you do not want to receive direct marketing, you can tell us by contact us using the method referred to the "How to Contact Us" section of this policy

### **Disclosure**

Common situations in which we disclose information are detailed below:

Disclosure to other members of the ITP Financial Services Group including ITP Home Loans and ITP Wealth where services provided by these members are requested by the client;

Disclosure to Quicksmart Tax Pty Ltd t/as ITP Dolls Point providing self-managed superannuation establishment, administration and compliance services on behalf of ITP SMSF;

Disclosure to other service providers.

ITP SMSF use a number of other service providers to whom we disclose personal information. These include providers that host our website servers, manage our Information Technology and manage our human resources information.

### **Disclosure of sensitive information**

We only disclose your sensitive information for the purposes for which you gave it to us or for directly related purposes you would reasonably expect or if you agree.

### **Disclosure of personal information**

ITP SMSF use Australian hosting service providers to whom we transfer all data (including all personal information) to our hosting service provider. You hereby consent this transfer.

### **Quality of personal information**

To ensure that the personal information we collect is accurate, up-to-date and complete, ITP SMSF:

Record information in a consistent format

Promptly add updated or new personal information to existing records.

We also review the quality of personal information before we use or disclose it.

### **Storage and security of personal information**

ITP SMSF take steps to protect the security of the personal information, ITP SMSF hold from both internal and external threats by:

Staff education;

- Technology and system security;
- Premises security;

- Conducting regular internal audits to assess whether we have adequately complied with or implemented these measures;
- Regularly assessing the risk of misuse, interference, loss, and unauthorised access, modification or disclosure that information;
- Taking measures to address those risks;
- Destroying personal information in a secure manner when we no longer need it;
- Accessing and correcting your personal information.

Under the Privacy Act (Australian Privacy Principles 12 and 13) you have the right to ask for access to personal information that we hold about you, and ask that we correct that personal information. You can ask for access or correction by contacting us and we must respond within 30 days.

If you ask, ITP SMSF must give you access to your personal information, and take reasonable steps to correct it if we consider it is incorrect, unless there is a law that allows or requires us not to.

ITP SMSF will ask you to verify your identity before we give you access to your information or correct it, and we will try to make the process as simple as possible. If we refuse to give you access to, or correct, your personal information, we must notify you in writing setting out the reasons. If we make a correction and we have disclosed the incorrect information to others, you can ask us to tell them about the correction.

ITP SMSF must give you access to your information or correct it unless there is a valid reason not to. If we refuse to correct your personal information, you can ask us to associate with it (for example, attach or link) a statement that you believe the information is incorrect and why.

#### **How to make a complaint**

If you wish to complain to us about how we have handled your personal information you should complain in writing.

We will tell you promptly that we have received your complaint and then respond to the complaint within 30 days. If you are not satisfied with our response you may ask for a review by a more senior officer of ITP SMSF.

#### **How to contact us**

You can contact us by: Email: [admin@itpsmsf.com.au](mailto:admin@itpsmsf.com.au) Post: PO Box 142 Ramsgate NSW 2217