

# Privacy Policy

## We're committed to protecting your personal privacy.

This policy applies to Spaceship Financial Services Pty Ltd ACN 611 615 797 (**Spaceship Financial Services**) and **Spaceship Capital Limited** ACN 621 011 649 (each, **we, us** and **our** and together, the **Spaceship Group**).

It lets you know about the kind of personal information we collect and the ways we use it.

This privacy policy was last updated on 2 September 2019.

## 1 Collection of your personal info

### What is personal information?

Personal information includes any information or opinion about an identified individual, or information from which a person's identity can be reasonably determined. The information or opinion will still be personal information whether it is true or not, and regardless of whether we have kept a record of it.

The information we seek to collect about you will depend on the products or services we provide. If you do not allow us to collect all of the information we request, we may not be able to deliver all of those services to you.

### What kinds of personal information do we collect and hold?

The types of personal information we collect and hold may include your name, date of birth, contact details (including your address (postal or email) and contact number), financial details (including bank account and internet banking log-in details), passport information, employment details, employment history, salary information, tax file number (**TFN**), contributions history, and nominated beneficiary details.

Sensitive information (such as information about your religious beliefs or affiliations, racial or ethnic origin, political opinions, criminal record,

sexual orientation or practices, health information, and biometric information) is a subset of personal information.

If we need this type of information, we'll ask for your permission – except where otherwise allowed by law.

### How do we collect your info?

We only collect your personal information by lawful and fair means. We'll generally collect your personal information directly from you (for example, when you apply for or request information in relation to a product or service online or over the phone). We'll also collect your personal information during the course of our relationship with you, which may include recording your interactions with us.

Occasionally we may collect personal information about you from other sources including other members of the Spaceship Group, public sources, information brokers, your employer, insurers, your bank, providers of identity verification services, and referral partners.

When you provide information about another individual to us (for example when you nominate a beneficiary) you will need to first obtain their consent and tell them about our Privacy Policy.

### Why do we collect your info and how do we use it?

We may collect and use your personal information:

- to provide you with information about our products or services
- to arrange, provide, manage, and improve financial products and services for you (this includes processing your application for a financial product, and opening, administering, and maintaining your membership/client account and records)

- to verify your identity, to verify your bank account information, and investigate and protect against fraud and unlawful activity
- to comply with laws which apply to us, including laws which help us to combat financial crime (such as anti-money laundering and counter-terrorism financing laws, and economic and trade sanctions laws) and the *Superannuation Industry (Supervision) Act 1993 (Cth)*
- to assist regulatory authorities and to protect our lawful interests, and
- subject to our legal obligations and your request to opt-out, to provide you with promotional information about financial products and services (we may also share your personal information with our related bodies corporate and joint promotion partners for this purpose).

### What laws require or authorise us to collect personal information?

We are required or authorised to collect:

- certain identification information about you by the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006 (Cth)* and *Anti-Money Laundering and Counter-Terrorism Financial Rules Instrument 2007 (No. 1) (Cth)*, and
- your tax file number, if you choose to provide it, by taxation laws including the *Income Tax Assessment Act 1936 (Cth)*, *Taxation Administration Act 1953 (Cth)* and in accordance with the *Superannuation Industry (Supervision) Act 1993 (Cth)*.

### Your tax file number

If you apply for Spaceship superannuation fund (**Spaceship Super**) membership and you choose to provide your tax file number (**TFN**), we collect your TFN on behalf of the trustee of Spaceship Super, and you give us and our agents permission to store and use your TFN as authorised by the *Superannuation Industry (Supervision) Act 1993 (Cth)*. In this 'Your tax file number' section a reference to **we, us, our** is a

reference to Spaceship Financial Services and Tidswell Financial Services Ltd (ABN 55 010 810 607 AFSL 237628) as trustee for the Tidswell Master Superannuation Plan.

We collect your TFN to facilitate your Spaceship Super membership, including contacting the Australian Taxation Office (**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.

We may disclose your TFN to another superannuation provider when your benefits are being transferred. However, we won't do this where you've asked us in writing not to disclose your TFN to any other superannuation provider.

You don't have to provide your TFN to us. However, if you do provide it:

- we'll be able to accept all permitted types of contributions to your account; if you don't provide your TFN we won't be able to accept personal (after tax) contributions from you
- other than the tax that may ordinarily apply, you will not pay more tax than you need to. This affects both contributions to your superannuation and benefit payments when you start drawing down your superannuation benefits. If you don't provide your TFN, a higher tax rate may apply to your concessional contributions and benefit payments, and
- it will make it much easier to find different superannuation accounts in your name so that you receive all your superannuation benefits when you retire. If you don't provide your TFN, it may be more difficult to locate or consolidate your super benefits or to receive all your superannuation benefits.

### What if you don't provide your info to us?

You don't have to give us your personal information. However, if you don't, we may not

be able to provide our products or services, or more information about them.

## 2 Disclosing your personal info

We may share your personal information with other members of the Spaceship Group. This helps us offer you a high-quality customer experience.

We may also share your personal information with:

- businesses that help us to provide our products and services to you – for example, trustee, administrators, custodians, auditors and providers of banking, payments, insurance, marketing, advertising, valuation, technology and data processing services
- businesses that help us verify your identity - for example, we may share your name, residential address, and date of birth for the purposes of verifying your identity, including with illion Australia Pty Ltd (**illion**). illion may subsequently use and share this information with its related bodies corporate and third-party service providers to enable illion to verify your identity. We may ask illion to provide, and illion will tell us, whether the information you have provided matches the information held by illion, its related bodies corporate or third-party service providers
- government and law enforcement agencies or regulators, including courts and tribunals
- your executor, administrator, trustee, guardian or attorney
- your agents, such as financial or legal advisers, or person with power of attorney
- organisations involved in our funding arrangements – such as investors, advisers, researchers, and rating agencies, and
- people that introduce you to us, such as our referral partners.

We may also share your information:

- as required or permitted by any law. For example, in response to a subpoena or to the tax office following a direction issued under taxation laws, and
- in accordance with your consent (which may be express or inferred from the circumstances).

We take all reasonable steps to ensure that these organisations are bound by confidentiality and privacy obligations with respect to the protection of your personal information.

We may disclose your personal information to overseas recipients who provide technology services to us and who are located in the United States of America.

## 3 Accessing and correcting your personal info

You may request access to, or correction of, the personal information that we hold about you by contacting us

We will provide our reasons if we deny any request for access to, or correction of, personal information. You can make a complaint (see section 8 in the event you are not satisfied with the reasons provided for denial of your request.

Where we decide not to make a requested correction to your personal information and you disagree, you may ask us to make a note of your requested correction with the information.

There is no fee for requesting access to your personal information, requesting correction of your personal information or for us to make any corrections to your personal information.

Sometimes we might charge a fee to cover the time we spend finding and putting together information you want. If there's a fee, we'll let you know how much it is likely to be, so you can choose if you want to go ahead.

## 4 Security

We take care to protect your personal information and employ a range of technical and administrative procedures to protect such information from unauthorised disclosure or loss. For example:

- access to information systems is controlled through identity and access management
- employees are bound by internal information security policies and are required to keep information secure
- all employees are required to complete training about information security, and
- we regularly monitor and review our compliance with internal policies and industry best practice.

We keep personal information in physical and electronic records, both at our own premises and with the assistance of our service providers.

If you are considering sending us any personal information through our website or other electronic means, please be aware that the information may be insecure in transit, particularly where no encryption is used (e.g. email).

We take reasonable steps to destroy or permanently de-identify any personal information when we no longer need it – for example, for business or legal reasons.

## 5 Website

We collect non-personal information about users of our website, including information on which areas of the website are most often accessed, how users navigate through the site and interact with pages (including fields completed in forms and applications completed), how long visitors visit those areas, and other information such as browser type, operating system and IP addresses, to help us manage and improve our website.

We store information that we collect through cookies, log files, and/or third-party site traffic software to create profiles of users generally.

We won't ask you to supply personal information publicly over Facebook, Twitter, or any other social media platform that we use. Sometimes we may invite you to send your details to us via private messaging, for example, to answer a question about your account. You may also be invited to share your personal information through secure channels to participate in other activities, such as competitions.

### Cookies

A "cookie" is a small text file which is placed on your internet browser and which we access each time you visit our website. When you visit the secured pages of our website (i.e. pages that you have to provide login details to access) we use cookies for security and personalisation purposes. When you visit the unsecured pages of our website (i.e. public pages that you can access without providing login details) we use cookies to obtain information about how our website is being used.

You may change the settings on your browser to reject cookies, however doing so may prevent you from accessing the secured pages of our website.

### Remarketing

Spaceship uses remarketing services to advertise third party websites to previous visitors. This could mean we advertise to previous visitors who haven't completed a task on our site. This could come in a variety of forms, such as Facebook ads or Google search results pages. Of course, any data collected will be subject to this policy, as well as the privacy policy of other remarketing services used by Spaceship. You can opt out of cookie-based advertising. If you have any questions, please email us at [help@spaceship.com.au](mailto:help@spaceship.com.au) or call us at 1300 049 532.

## **Email**

When we receive emails, we will retain the content of the email and our response to you where we consider it necessary to do so.

Your email address will only be used or disclosed for the purpose for which it was provided. It will not be added to any mailing lists or used for any other purpose without your consent.

## **Security**

We make reasonable efforts to ensure that the most up-to-date security measures are used on our website to protect your personal information. However, we cannot guarantee that any information transmitted via the internet by us, or yourself, is entirely secure. You use our website at your own risk.

## **Links on our website**

Our website may contain links to third-party websites. We advise that the terms of this policy do not apply to external websites. If you wish to find out how any third parties handle your personal information, you will need to obtain a copy of their privacy policy.

## **6 Bank account verification**

We use a third-party service provider (Illion) to help you choose what account you'd like to make payments from and to, and to help us verify your bank account details – which helps us to manage any fraud risk.

We do this by asking you to provide your internet banking login details, which will be used by Illion to establish a secure and automatic connection with your bank. Illion will retrieve your bank account details (including the type, name, BSB, account number, and balance). We'll present these details to you so that you can select the bank account from which you'll make payments from and payments will be made to you. Once you have selected your preferred bank account, Illion will provide your bank account name, BSB and account number (of your selected account) to us. Illion will then

securely destroy your internet banking login details.

We only have access to view and store your account name, BSB and account number of the account that you select to use. Neither Illion nor us will have the ability to control your account or perform any transactions on your account.

The ePayments Code is a code of practice that most banks have subscribed to. The ePayments Code protects you when making electronic payments such as by using internet banking. If your bank subscribes to the ePayments Code, you have rights and obligations in relation to sharing your internet banking details. By entering your internet banking details, you acknowledge that your rights under the ePayments Code may be affected and where an unauthorised transaction or fraudulent activity occurs, you may be liable for loss that arises.

## **7 Marketing**

We may use your personal information to provide you with information about products and services, including those of third parties, which we consider may be of interest to you.

We may also provide your details to other organisations for specific marketing purposes.

You may opt out at any time if you no longer wish to receive marketing information. In order to do so, you will need to request that we no longer send marketing materials to you or disclose your information to other organisations for marketing purposes. You can make this request by emailing us at [help@spaceship.com.au](mailto:help@spaceship.com.au), calling us at 1300 049 532 or by "unsubscribing" from email marketing messages.

## **8 Contacting us to ask questions, raise concerns or provide feedback**

If you have any questions, concerns, complaints or feedback about privacy, please contact our Privacy Officer:



Privacy Officer  
Suite 4.02, 77 King Street  
Sydney NSW 2000  
1300 049 532  
[help@spaceship.com.au](mailto:help@spaceship.com.au)

We take your privacy concerns seriously. Where you express any concerns that we have interfered with your privacy or have breached Australian Privacy Principles, we will respond to let you know who will be handling your matter and provide a response within 30 days.

We aim to resolve your concerns in a fair and efficient manner.

If, however, you are unsatisfied with our response, you can lodge a dispute with our external dispute resolution scheme, The Australian Financial Complaints Authority, which provides a free independent industry dispute resolution service:

Australian Financial Complaints Authority  
GPO Box 3, Melbourne, VIC 3001  
1800 931 678  
[info@afca.org.au](mailto:info@afca.org.au)  
[www.afca.org.au/make-a-complaint](http://www.afca.org.au/make-a-complaint)

You may also lodge a complaint with the Office of the Australian Information Commissioner (**OAIC**):

OIAC  
GPO Box 5218, Sydney, NSW 2001  
1300 363 992  
[enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au)  
[www.oaic.gov.au](http://www.oaic.gov.au)

## **9 Changes to this policy**

We may make changes to this policy from time to time, without notice to you. An up-to-date copy of this policy is available on our website.