

Master Builders Fidelity Fund – Privacy Policy

This Privacy Policy applies to personal and sensitive information that is collected, used and disclosed by the Master Builders Fidelity Fund (**Fund**).

The Fund respects its obligations to protect the privacy of the personal and / or sensitive information of the individuals it deals with, in accordance with the Australian Privacy Principles (**APPs**) of the *Privacy Act 1988* (Cth) (**Privacy Act**).

Where personal and/or sensitive information is provided to the Fund, individuals agree to such information being collected, stored, used and disclosed as set out in this Privacy Policy.

COLLECTION

What personal and sensitive information does the Fund collect and hold?

The Fund only collects personal information (i.e. information which could reasonably identify an individual) that is reasonably necessary for its services, functions and activities, or where is otherwise required or permitted to be collected by law.

The Fund collects personal information including names, addresses, e-mail addresses, phone / fax numbers, licence numbers, payment details, occupation details, employer details, date of birth and other information.

The Fund only collects sensitive information (e.g. information about an individual's race, ethnic origin, political opinions or association, trade or professional associations and memberships, union membership, criminal record or health information) if the individual has consented to us doing so and it is reasonably necessary for our services, functions and activities, or where is otherwise required or permitted by law.

The Fund collects sensitive information about an individual's trade and professional associations.

How and from whom does the Fund collect personal information?

The Fund only collects personal information by lawful and fair means.

Wherever reasonable and practicable, the Fund collects personal information from the individual to whom the information relates or their authorised representative. This is typically as a result of, and in connection with, our on-going business relationship with those individuals.

We collect personal information in circumstances including, but not limited to, when individuals:

- request or acquire a product or service from us;
- provide a service or product to us;
- apply for employment with us;
- communicate with us via our website, e-mail, mail, facsimile or telephone;
- attend face-to-face meetings and interviews with us;
- provide a business card; or
- fill out forms/pre-fill forms.

We may also collect personal information through:

- cookies, IP addresses and session tokens. This software on our website and servers stores information and enables our website to recognise individuals' web browsers and remember certain information to assist individuals' future use of our website. Your IP address may also be stored as an additional security measure and may be used to identify you; and
- recording information individuals give us, e.g. if we record telephone conversations with individuals for training and monitoring purposes (we will only do this with individuals' consent when they call us, and individuals will have the option to 'opt out' of recording).

Why do we collect the personal information?

We collect personal information where it is necessary to:

- provide individuals with the products and services;
- provide individuals with information about products and services that may be of interest to them;
- improve the products and services we provide; and
- enable us to conduct our business, including meeting our legal and regulatory obligations.

Generally we will tell individuals why we are collecting the information, prior to or when we collect it.

If individuals do not provide their personal information, we may not be able to supply the requested product or service, employ or otherwise deal with the individual.

Unsolicited personal information

If we receive personal information that we have not requested and we determine that we could not have lawfully collected that information under the APPs had we asked for it, we will destroy or de-identify the information if it is lawful and reasonable to do so.

USE AND DISCLOSURE

The Fund uses personal information:

- in the ordinary course of conducting our business. For example, supplying or acquiring products and services; responding to individuals' enquiries and feedback; providing information about products and services that may be of interest to individuals; and maintaining a relationship with individuals;
- to determine whether an individual is a member or potential member of Master Builders ACT, and to market the benefits of membership to the individual;
- assess a company's compliance with its legal obligations;
- for market research and product and service development, so that we are able to better understand our clients' needs and tailor our future products and services accordingly;
- in performing general administration, reporting and management functions. For example, invoicing and account management, payment processing, training, quality assurance and managing suppliers;
- for employment-related purposes, such as recruiting and providing services to staff;

- for other purposes related to or in connection with our business, including meeting our legal and contractual obligations to third parties and for internal corporate governance purposes; and
- as required or permitted by law.

We may disclose personal information to:

- people and organisations engaged by us to provide products or services, or to undertake functions or activities, on our behalf. For example, assessing risk, processing payment information, managing databases, marketing, research and advertising;
- to people and organisations where required to fulfil a service an individual has requested us to undertake;
- Master Builders ACT, to provide individuals with information about membership;
- our contractors, business partners (e.g. where individuals would receive a corporate discount) joint venturers, partners or agents; and
- our external advisers, e.g. where disclosure is reasonably required to obtain advice, prepare legal proceedings or investigate suspected unlawful activity or serious misconduct.

We may use and disclose individuals' personal information to provide individuals with information about our products and services that we consider may be of interest to the individual. An individual may contact us (see below) if they wish to opt out of receiving marketing offers, via email or otherwise. Direct marketing offers will contain an opportunity to opt out from receiving further communications of this nature.

The Fund will only use or disclose an individual's sensitive information for the purpose for which it was initially collected (the 'primary purpose') or for another purpose only with your consent or if required or permitted by law.

The Fund is not likely to disclose personal information to overseas recipients. However, third parties engaged by the Fund may disclose personal information to entities outside of Australia. Any overseas disclosure does not affect our commitment to safeguarding individuals' personal information. The Fund will take steps that are reasonable in the circumstances to ensure that the overseas recipient safeguarding individuals' personal information, for example by checking that the third party which may disclose the information to overseas recipients has a privacy policy that complies with the Australian Privacy Principles (**APPs**).

However, by agreeing this policy, individuals acknowledge that we will no longer be required to take reasonable steps to ensure overseas recipients' compliance with the APPs in relation to the individual's information and we will not be liable to the individual for any breach of the APPs by those overseas recipients.

QUALITY OF INFORMATION

The Fund will take reasonable steps to ensure that the information that we collect, use and disclose is accurate, complete and up-to-date. However, we rely on individuals to advise us of any changes or corrections to the information we hold about the individual. An individual is able to contact us (see 'Contact us') and ask for the correction of personal information we hold if the individual believes the information we hold is inaccurate or incomplete.

SECURITY OF PERSONAL INFORMATION

The Fund will take reasonable steps to keep personal information protected from loss and misuse and unauthorised access, modification and disclosure. We use a variety of physical and electronic security measures including locked filing cabinets, off-site secure storage providers, restricted access electronic files, firewalls, appropriate encryption and secure databases.

When personal information that we collect is no longer required, we will take reasonable steps to destroy or permanently de-identify the personal information. The Fund may retain personal information indefinitely if it considers that it could be necessary for its future services, functions and activities, to confirm an individual's regulatory compliance, or where it is otherwise required or permitted to be retained by law.

ACCESS OF PERSONAL INFORMATION

An individual may contact us (see below) to access the personal information that we hold about the individual. We will respond to such a request within a reasonable period after the request is made. There are occasions where this access may be denied under the exemptions contained in the Privacy Act. If we deny access in some circumstances, we will advise the individual about the reasons.

No fee applies for requesting access to information we hold about individuals. However, we reserve the right to charge a reasonable fee where we do provide access.

CORRECTION OF PERSONAL INFORMATION

An individual may contact us (see 'Contact us') to correct the personal information that we hold. We will deal with your request within a reasonable period after the request is made. We will take all reasonable steps to correct that information and ensure that, having regard to the purpose for which it is held, the information is accurate, up-to-date, complete, relevant and not misleading.

PSEUDONYMS AND ANONYMITY

Where lawful and practicable, we will give individuals the option of interacting with us anonymously or using a pseudonym.

AVAILABILITY OF PRIVACY POLICY AND AMENDMENTS

This policy is publicly available. It will be reviewed from time to time and any amendments will be included in the updated policy.

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Policy periodically for changes. Any revised policy will be placed on our website at www.mba.org.au/homewarrantyinsurance.

An individual's continued use of our website, products or services, requesting our assistance, or the provision of further personal information to us after this Privacy Policy has been revised, constitutes the individual's acceptance of the revised Privacy Policy.

MAKING A COMPLAINT

An individual may contact us (see below) to complain about a breach of this Privacy Policy or the APPs. The Fund will handle any complaints promptly in a professional manner by referring the matter internally to the Fund's Privacy Officers. The Fund will endeavour to remedy any breaches of this Privacy Policy or the APPs and put procedures in place to ensure any such breaches are not repeated. If the complainant is not satisfied with the way the Fund has handled a complaint, a further complaint to the Office of the Australian Privacy Commissioner is able to be made.

HOW TO CONTACT US

For further information contact us at:

Master Builders Fidelity Fund

PO Box 1211
Fyshwick ACT 2609

1 Iron Knob St
Fyshwick ACT 2609

Phone: 02 6175 5995

Fax: 6249 8374

Email: canberra@mba.org.au