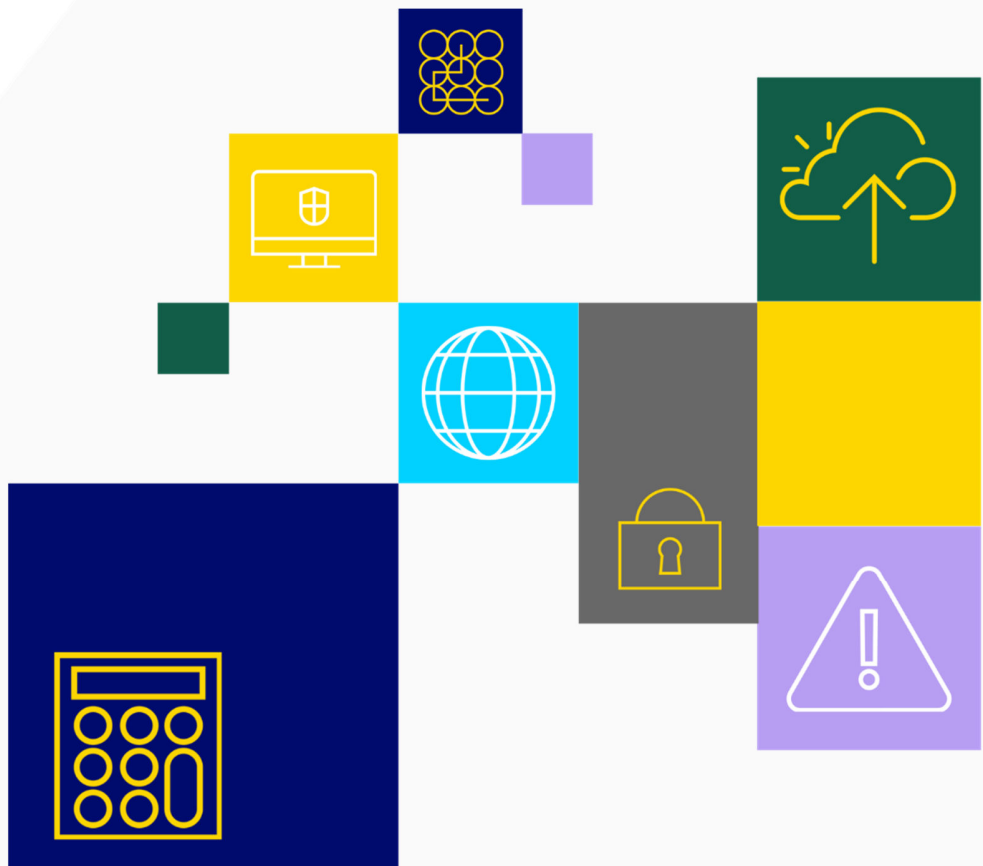


Privacy Policy



Refresh Super

PRIVACY POLICY

Provided by:



Prepared by:

Robert James Lawyers

DISCLAIMER

*This Privacy Policy has been prepared and is provided as a template based on a typical accounting firm scenario. Please be aware that factors specific to your firm such as what type of personal information you collect and how it is used will need to be considered in order to make sure this document is best suited to your firm's needs and to make sure you follow the correct steps to comply with your obligations in accordance with the relevant privacy law.

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Privacy Policy

About this Document

This Privacy Policy has been adopted by Refresh Super Pty Ltd (ABN 56650139227) Refresh Super, “we”, “us” and “our” including any corporate entity owned or controlled by this company.

Our employees, contractors, consultants, partners and any other third party entities that at our direction have access to your personal information are bound by and must adhere to this Privacy Policy

By providing personal information to us you consent to our collection, use and disclosure of your personal information in accordance with this Privacy Policy.

We reserve the right to make amendments to this Privacy Policy at any time and will make available to you details of the changes we make. If you have objections to our Privacy Policy, you should notify us immediately and not submit personal information to us.

Commitment

As responsible data custodians we are committed to protecting your personal information. This Privacy Policy outlines how we collect, use, store and disclose your personal information in accordance with the Australian Privacy Principles 2014 (**APPs**) established under the Privacy Act 1988 (**Privacy Act**).

You can obtain further information regarding the APPs and your privacy rights at the Office of the Australian Information Commissioner (**OAIC**) at www.oaic.gov.au.

Personal or sensitive information we collect

We may collect personal information that you have supplied to us such as your name, age, date of birth, address, and other contact details. We may also collect sensitive information from you with your consent (in specific circumstances).

The type of information we may collect depends on your dealings with us and may include:

- Name, contact details;
- Identification information – e.g. your tax file number, address, phone number, date of birth
- Super Funds Financial information – e.g. bank accounts, shareholdings, loans; investments
- Super Funds Financial circumstances – e.g. assets and liabilities, credit reporting, income, expenditure, insurance,

Collection & Use

We may collect personal information from you or from third parties by:

- Having face-to-face meetings and telephone discussions with you;
- Asking you to reply to emails requesting additional copies of documents;
- You using our website and interacting with our social media sites;
- You communicating with us through correspondence;
- Conferring with third parties such as financiers or the Australian Taxation Office on your behalf;



- Using “cookies” or other similar tracking technologies on our website that track website usage, preferences and personal account information; and
- Requesting information from a publicly available source.]

We collect personal information from you to be able to provide you with the services you have requested us to provide including:

- Providing you with Superannuation administration services;
- Preparing tax returns and financial accounts; and
- Liaising with third parties on your behalf such as financial institutions, government organisations, insurance.]

We may use your personal information to make automated decisions using computer programs. The types of personal information we may use includes:

- Member details (name, date of birth, contact details);
- Super Fund Financial information;
- SMSF transaction data from data feeds
- Contribution and pension information
- Investment transactions (buys, sells, corporate actions)
- Property-related information (valuations, title details)
- Actuarial certificate inputs (balances, pension status)

Decisions that may be made with the assistance of a computer program include:

- A decision pursuant to an agreement or arrangement we have with you;
- Categorising transactions based on data-feed rules
- Allocating investment transactions to the correct member accounts
- Calculating tax components, contributions, and pension balances using software
- Generating financial statements and tax return figures based on system-processed data

We do not make decisions solely using automated systems.

Disclosure

We may disclose your personal information for the following purposes:

- To enable you to access and use our services and in turn provide our services to you;
- For purposes that you consent to such disclosure or for a related purpose where you would reasonably expect such disclosure; and
- Any circumstance otherwise authorised by the APPs and/or the Privacy Act.]
- To enable us to prepare your SMSF financial statements, tax returns and BAS
- To obtain property valuations, title searches or actuarial certificates where required
- To provide information to your SMSF auditor
- To liaise with the ATO, ASIC or other government bodies on your behalf
- To maintain data feeds with financial institutions and investment platforms

We will only use sensitive information for the primary purpose it was obtained for or for a secondary purpose that is directly related to the primary purpose (or where otherwise required by law).

We may disclose your personal and sensitive information to trusted third parties, including the following entities:



- Our representatives, advisers, employees
- third party suppliers and service providers such as the providers for the operation of our website or business services;
- The Australian Taxation Office (ATO) to meet ongoing compliance;
- The Australian Securities & Investments Commission (ASIC) on request to meet ongoing compliance, mandatory professional standards and other legal obligations;
- Specific third parties authorised by you to receive information held by us; and
- As required by law or directed by legal decision/process;
- Any industry body, tribunal, court or otherwise connected with any complaint regarding our services.
- Independent SMSF auditors for the purpose of completing the annual audit.
- Property valuers, real estate professionals or title search providers where required for SMSF compliance.
- Actuarial service providers for the purpose of preparing actuarial certificates.
- Banks, brokers, investment platforms and data-feed providers to maintain transaction data feeds.
- SMSF document providers where updates or documents are requested.

Security

We take our security obligations seriously and your personal information is regarded as confidential and may be held in both hard copy and/or electronic versions. We will take all reasonable steps to safeguard your information so that it is not misused, lost, modified, accessed by unauthorised persons or disclosed without authorisation.

As part of our commitment to protecting your personal information under the Act and APPs, we implement appropriate technical and organisational measures to ensure the security of personal information we hold.

Our technical measures taken by us to protect your personal information include, but are not limited to:

- encryption of personal information in transit and at rest;
- network security controls including firewalls and intrusion detection systems;
- access controls and authentication systems;
- anti-virus and anti-malware software;
- regular security updates and patch management;
- backup and recovery systems with secure storage; and
- data loss prevention controls.

Our organisational measures taken by us to protect your personal information include, but are not limited to:

- privacy and security policies, procedures and standards;
- staff training on privacy and security obligations;
- regular privacy impact assessments and security risk assessments;
- incident response and data breach management procedures;
- privacy governance framework with designated privacy officers;
- vendor management and due diligence processes;
- regular review and testing of security controls; and



- privacy by design and privacy by default approaches.

We regularly review and update our technical and organisational measures to ensure they remain appropriate to the risks and threats to your personal information, taking into account:

- the nature and sensitivity of the personal information we hold;
- the current state of technology;
- the cost of implementation; and
- the possible adverse consequences for individuals if a security incident occurs.

Our technical and organisational measures are designed to ensure the ongoing confidentiality, integrity, availability, and resilience of our information systems and services.

We will always endeavour to store your information on an Australian server. However, in circumstances where this is not possible, we may disclose your personal information to an overseas entity. Where we disclose your personal information outside of Australia, we will take reasonable steps to ensure that your personal information is treated securely in accordance with our privacy policy and laws equivalent or similar to the Privacy Act.

As responsible data custodians we are familiar with the requirements of the Notifiable Data Breaches scheme and are committed to responding to data breaches in accordance with our obligations under the Privacy Act. We will notify the Office of the Australian Information Commissioner and you if there is unauthorised access to, unauthorised disclosure of, or loss of, personal information held by us and the access, disclosure or loss is likely to result in serious harm to any of the individuals to whom the information relates in accordance with the Privacy Act.

Our website may contain links to external websites operated by third parties. The privacy policies of these other websites may not accord with this Privacy Policy and we cannot be held responsible and do not have control of the use of your personal information by these third parties.

As responsible data custodians, any breach of this Privacy Policy by our employees, contractors, consultants, partners and any other entity that at our direction have access to your personal information will invoke disciplinary and possible legal action against the offending party.

When your personal information is no longer needed (including to comply with applicable laws and record-keeping obligations), we will take reasonable steps to destroy or permanently de-identify it.

Accessing, Updating and Correcting Your Personal and Sensitive Information

You have a right to access your personal information, subject to exceptions allowed by law. If you would like to do so, please provide us with a request in writing to the contact details listed below. Depending upon the complexity of the request, we will endeavour to respond to you within four weeks of receiving your request. We reserve the right to charge a fee for searching for, and providing access to, your information on a per request basis. Where we cannot provide you with access to all of your personal information, we will provide you with reasons why. We may also require your identity to be verified when you send in your request and prior to sending any substantive response.

If at any time you believe that information we hold about you is incomplete, inaccurate, irrelevant, misleading or not up-to-date, please contact us and we will take reasonable steps to correct the information in accordance with the Privacy Act.



Complaints and Inquiries

If you have a complaint regarding the way we have handled your information, or have any questions about this Privacy Policy, or your personal information we hold, please contact us by any of the following means:

Refresh Super

Luis Cordero

Luis@refreshsuper.com.au

07 5551 0316

Please make sure to include your name and return contact details with any inquiry.

We will endeavour to respond to your complaint or inquiry within a reasonable period from when it is received.

If you are not satisfied with our response to your complaint or inquiry you can contact the Office of the Australian Information Commissioner (OAIC) at www.oaic.gov.au.

Policy Effective: [9/3/2026]

