

Vision Super Pty Ltd

ABN 50 082 924 561

# Access policy

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## BACKGROUND

This policy supports the main [Privacy policy](#)

## STATEMENT OF POLICY

### General Principle of Access

In the course of conducting its normal business activities, Vision Super collects, records, maintains and uses personal information in relation to its members, beneficiaries and employees of relevant authorities and participating employers (“individuals”). Any personal information, including sensitive information held in respect of these individuals can be accessed by that person on written request, subject to the following conditions:

### Breaches of other individuals' privacy

Access to personal information will be denied where it might unreasonably impact on the privacy of other individuals. Where practicable, the identity of those other individuals will be withheld and access given.

### Dangers to health and safety

Access to personal information may be denied where access might pose a serious and imminent threat to life, health or safety of any individual, or to public health or public safety. For example, where providing access to information about an individual's medical condition, or personal relationships previously known to that individual, might cause that individual to harm themselves or others.

### Frivolous or vexatious requests

Access may be denied where the request is deemed to be frivolous or vexatious in nature.

### Deliberations of the Vision Super Board

Where personal information is presented to the Vision Super Board or a committee of the Board in the course of its deliberations, access will only be granted to:

- Information provided directly by the individual concerned.
- Information contained in reports or opinions from independent experts or other third parties.

### **Criminal or unlawful activity, legal prejudice**

Access may be denied where:

- providing access is unlawful or denying access is required by an Australian law;
- providing access would prejudice investigation and prosecution of criminal or unlawful or seriously improper activity;
- providing access would prejudice the detection, investigation or remedying of serious improper conduct;
- Vision Super has reason to believe that unlawful activity or serious misconduct relating to the function of Vision Super is being engaged in, and giving access is likely to prejudice the taking of appropriate action to remedy such activity;
- giving access is likely to prejudice an enforcement related activity/activities conducted by, or on behalf of an enforcement body (such as the Australian Federal Police, APRA, ASIC, state or territory police, or IBAC);
- providing access would be likely to prejudice proceedings before a court or tribunal, or implementation of its orders;
- the information relates to legal proceedings between Vision Super and the individual concerned, and would not be accessible to them by the process of discovery in those proceedings.
- an enforcement or national security body requests Vision Super not to provide access on the basis that it would be likely to damage Australia's national security interests;
- providing access might prejudice confidential negotiations between Vision Super and another party; or
- where giving access would reveal information concerning a commercially sensitive decision making process (Vision Super will include the reasons for the commercially sensitive decision, if access is refused in these circumstances).

### **Denial of access by third party**

Personal information may be provided to Vision Super by a third party on the basis that access to that information by the individual concerned will be denied. Where this is the case, Vision Super may deny access to the individual, provided that the denial is in accordance with the Australian Privacy Principles.

### **Intermediaries, de-identification and selective access**

Where access has been denied for any reason stated above, Vision Super will take reasonable steps to provide access by alternative means such as the:

- use of a mutually agreed intermediary;
- de-identification of either individuals or organisations in the information requested; or
- selective access or reproduction of documents to withhold only that information to which access is denied.

## Corrections to personal information

Vision Super takes all reasonable steps necessary to ensure that all of the personal information of individuals is accurate, up-to-date, complete, relevant and not misleading.

However, Vision Super will also act upon verified feedback from an individual to correct any personal information which is inaccurate, out-of-date, irrelevant, incomplete, misleading or not related to the purpose for which the information was collected.

Where personal information consists of opinions of, or determinations by, independent experts, or statements of intent by or the exercise of an election by an individual, that information will be taken as a record at the time it was provided, and will not, in normal circumstances, be subject to correction.

If Vision Super has corrected an individual's personal information, which has previously been disclosed to another organisation by Vision Super and the individual requests that Vision Super notify the other organisation of the correction, Vision Super will take all reasonable steps (if necessary) to advise the other organisation of the correction, unless it is unlawful or impracticable to do so.

In the event that Vision Super refuses to correct the personal information of the individual after the individual has made a request to correct such information, Vision Super will provide a written notice to the individual stating the following:

- the reasons for the refusal (where reasonable and practicable);
- the avenues available for the individual concerned to complain about the refusal to correct the individual's personal information; and
- any other matters prescribed by the relevant regulations.

If the individual and Vision Super disagree about whether information is accurate, complete, up-to-date, relevant, misleading, or related to the purpose for which the information was collected, and the individual asks for his/her position to be noted, a statement to that effect must be placed on the individual's record as a notification to users of the individual's personal information.

If an individual makes a request to correct their personal information, or requests a statement to accompany their personal information concerning the accuracy of their information, Vision Super will comply with such a request within a reasonable period after the request has been made, and will not charge the individual for making or complying with the request.

## Format of request and access

Requests for access must be made in writing, setting out the full name of the individual seeking access, the information to be accessed, and the address for provision of documents.

Applications should be addressed to:

**The Privacy Officer  
Vision Super  
PO Box 18041  
Collins Street East  
Melbourne Vic 8003**

Access to documentary information will be provided as photocopies, and information held on computer systems will be reproduced in printed format.

Following the request for access Vision Super's Privacy Officer will assess the request and, within a reasonable period after the request is made, provide the individual with access to the information in the manner requested by the individual, if it is reasonable or practicable to do so.

Where access is denied the individual will be notified in writing of the denial and the reason for such denial (where practicable), as well as the mechanisms available to complain about the refusal. Satisfactory proof of identity will be required prior to access being granted.

#### **Charges for access**

In most cases access will be provided free of charge, but Vision Super reserves the right to impose reasonable charges for provision of information, either generally, or on a case-by-case basis. However, any charge imposed for access will not be excessive, and the charge will not relate to the making of the request.

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CEO

7 March 2014