



Privacy Policy

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Privacy Policy

This privacy policy explains how SuperConcepts will handle and protect Personal Information it collects about individuals including customers and potential customers.

'SuperConcepts', 'we', 'us' or 'our' refers to SuperConcepts Pty Ltd and each of its entities operating in Australia listed at the end of this policy. These entities trade as "Cavendish", "SuperConcepts", "SuperIQ", "SuperMate" or "More Superannuation". We provide software, administration, document services and education solutions and other products and services.

We are committed to protecting your privacy. At all times we will comply with the terms of this policy when handling your Personal Information. This policy answers the following questions about privacy at SuperConcepts:

Why do we need your Personal Information?

We provide solutions in software, administration, document services and education in respect of SMSFs as well as other products and services under various brands offered by entities within the SuperConcepts group. To do this effectively, we need to collect certain Personal Information.

In this policy, Personal Information includes any information that could identify you or be used to establish your identity, as defined under the *Privacy Act 1988* (Cth) (**Privacy Act**) and the Australian Privacy Principles (**APPs**).

We collect, hold, use and disclose customers' Personal Information so we can establish, manage and administer the products and services provided by us, and comply with legal and regulatory obligations. We may also use and disclose your information for purposes related to those mentioned above, such as:

- Assisting with your questions and complaints
- Arranging for services to be provided by third parties
- Enhancing our customer service and product options (see the section 'Will my Personal Information be used for direct marketing?')
- Internal operations, such as record keeping, data analytics, auditing or training.

We may also collect, hold, use and disclose customer's Personal Information to comply with the 'Customer Due Diligence' requirements in the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (**AML/CTF Act**). This includes collection for purposes such as:

- Establishing, verifying and re-verifying your identity before providing certain services to you
- Assessing and managing potential money laundering, terrorism financing, proliferation financing risks or related compliance risks associated with the provision of our services
- Monitoring for Politically Exposed Person and Targeted Financial Sanctions watchlist statuses
- Making reports and meeting record keeping obligations required by law under the AML/CTF Act.

Will my Personal Information be used for direct marketing?

We use and disclose your Personal Information to keep you informed about the range of products and services offered by us. You can opt out of receiving direct marketing information from us at any time (see the section 'How can you contact us about privacy?'). We may continue to send service-related or account-related communications where necessary.

Please note that where you opt out from our marketing communications, we may keep a record of your contact details to ensure we do not send you marketing communications in future.

What happens if I do not provide information that has been requested?

It's your choice whether to provide your Personal Information. However, if you don't, we might be unable to fulfil your request for a specific product or service or be unable to identify you to protect you against fraud.

What types of Personal Information do we collect?

We may ask for a range of Personal Information to assist us in providing you with relevant products and services. The information we request could include (but is not limited to) name, address, date of birth, contact details, occupation, income, assets and liabilities, account balances, tax and financial statements, health information, employment details, domicile and citizenship status.

Will we collect Sensitive Information?

We rarely need to collect and use Sensitive Information as defined under the Privacy Act. If we need to obtain, use and disclose this type of information, we will ask for your consent, except where disclosure is permitted by law.

Where you voluntarily disclose Sensitive Information, we will only use that information for the purpose for which it was provided or as permitted or required by law and will handle it in accordance with this policy (see the section 'How do we protect your Personal Information?').

How do we collect Personal Information?

Most of the Personal Information we collect will be directly from you. We gather this information either through application forms or other forms that you complete and submit to us, including in writing, digitally or through our mobile application, and by recording the information you provide via phone calls, interviews, email and other forms of communication with us. We may also collect certain information automatically when you use our websites or mobile applications, such as information about your device, interactions with our services and usage of our digital services, as described in 'What about privacy and the internet?'.

In some cases, we might collect your Personal Information from external sources. Examples of the people or organisations that may provide us with information are:

- your SMSF Trustee when a new member or beneficiary joins or they apply for a new product for your SMSF
- parents or guardians in respect of children
- persons authorised by you to act on your behalf (such as advisers, lawyers, accountants or other individuals or organisations)
- product and service providers you authorise to give us your information for us to provide you an administration service

- third parties such as information verification service providers and the Australian Government's Document Verification Service (DVS)
- third parties providing identity verification services including biometric authentication technologies
- public sources of information (websites that make your information available)
- market research organisations (through surveys or telephone polls)

We only collect your information from external sources when we are permitted to do so.

Can you remain anonymous or use a pseudonym when dealing with us?

If you wish to remain anonymous or to use a pseudonym when dealing with us, we may be able to provide you with limited information or services. However, in many cases it will not be possible for us to assist you with your specific needs if you wish to remain anonymous or use a pseudonym.

We may also use your Personal Information in de-identified form (de-identification being a process by which a collection of data or information is altered to remove or obscure personal identifiers and Personal Information) to assist us in running our business. Aggregated or de-identified analytics data may be shared with our development and analytics partners or other third parties.

When your Personal Information is included as de-identified, aggregated data, it is not possible to identify you or anything about you from that data.

How do we protect your Personal Information?

Whether your Personal Information is gathered through face-to-face meetings or by interacting with us via telephone, mail, internet, mobile applications or other methods, we take steps to store your information securely. We hold your Personal Information in a combination of electronic and hardcopy formats.

We take a number of steps to protect Personal Information from misuse, loss, unauthorised access, modification or improper disclosure. These include appropriate technical and organisational safeguards, instructing our staff who handle Personal Information on our obligations to protect the confidentiality of customer information and the privacy of individuals.

We retain Personal Information only for as long as reasonably necessary for the purposes for which it was collected, including to meet legal, regulatory, accounting and reporting obligations. When we no longer need your Personal Information, we will take reasonable steps to delete, destroy or de-identify it.

In the event that you decide that you no longer want us to hold your Personal Information, you may contact our Privacy Officer to request deletion of your Personal Information on record (see the section 'How can you contact us about privacy?'). We will consider your request and, where we are not required or authorised by law to retain the information, take reasonable steps to delete or de-identify it within a reasonable timeframe.

Who do we share Personal Information with?

From time to time, we may share your Personal Information with other entities both within and outside of SuperConcepts. The entities that we might share your Personal Information with vary according to the product or service involved, but could include:

- other areas or businesses within SuperConcepts for reasonable business purposes
- businesses and organisations or other parties authorised or accredited by us to provide services to you on our behalf.
- service providers, specialist advisers, consultants and contractors we engage to provide us with services, such as administrative, financial, software development, marketing, sales or research services, some of whom may contact you on our behalf
- information verification services, the Australian Government Document Verification Service (DVS) or reference agencies or investigators
- employers contributing to your SMSF
- anyone authorised by you or to whom you have provided your consent (either expressly or impliedly), including but not limited to other service or financial services providers that we may need to deal with on your behalf
- anyone to whom we, or our service providers, are required or authorised by law to disclose your Personal Information (for example, law enforcement agencies, and national and international government and regulatory authorities including but not limited to the Australian Taxation Office, the Australian Prudential Regulation Authority, the Australian Securities and Investments Commission, Office of the Australian Information Commissioner, the Australian Transaction Reports and Analysis Centre and the United States Internal Revenue Service)
- other financial services institutions - in order to detect, investigate or prevent actual or potential fraud in connection with the products or services we provide to you.

Do we use AI?

Sometimes we use artificial intelligence ('AI') for purposes set out below, to analyse information, identify trends, generate insights, assist with workflow management and support decision-making processes. This may involve the use of Personal Information that we collect in connection with the products and services we provide to you.

We may also arrange for computer programs to make, or assist in making, decisions that could reasonably be expected to significantly affect an individual's rights or interests as set out in the below table.

Type of Information	Our Response
The kinds of Personal Information used in the automated decision-making	Personal details and contact information, customer correspondence, call recordings and transcripts, product and service information, account information, customer interaction records, technical usage information and other information provided to us in connection with our products and services.
The kinds of decisions made solely by the automated decision-making program	Call transcription and summarisation outputs, customer service analytics, workflow routing, operational reporting, information categorisation, trend analysis, quality assurance reporting and process efficiency recommendations.

Type of Information	Our Response
The kinds of decisions where an important and direct part of making the decision is carried out by the automated decision-making program	Generating summaries of customer interactions, identifying service trends, assisting staff to respond to enquiries, supporting operational decision-making, prioritising workflows and identifying opportunities to improve customer outcomes and business processes.

We do not make significant decisions about you based solely on automated processing without human review. If you have questions about how AI is used in connection with your Personal Information, please contact our Privacy Officer (see the section ‘How can you contact us about privacy?’).

Do we send Personal Information to overseas recipients?

Some of the entities that we share information, or whose services that we use, may be located in, or have operations in, other countries.

This means that your information might end up stored or accessed in overseas territories, including the European Union, India, Vietnam or the United States.

When we send your Personal Information to overseas recipients, we take reasonable steps to ensure the recipient handles the information in a manner consistent with the APPs, including through contractual protections if required by law. Where we engage third-party service providers, we take reasonable steps to ensure that they are bound by appropriate confidentiality, security and privacy obligations consistent with the APPs. We require those providers to use Personal Information only for the purposes for which it is disclosed and in accordance with our instructions or contractual arrangements.

Notwithstanding the above, by providing Personal Information to us, you expressly consent to providing Personal Information to overseas recipients and acknowledge that such overseas recipients may not be subject to the Privacy Act or APPs and that, in the event of a breach by an overseas recipient, we will not be accountable for said breach under the Privacy Act and you may not be able to seek redress under Australian law.

How do we update Personal Information?

We will update your Personal Information if you contact us. In most cases you can update your Personal Information over the phone or via our website.

We may update your Personal Information if we believe the Personal Information we hold is incomplete or out of date, and we may seek to correct or complete our records by gathering data from other sources such as public records and other organisations.

What if a suspected data breach occurs?

If you suspect any misuse or loss of, or unauthorised access, modification or disclosure to, your Personal Information, you should let us know immediately by contacting our Privacy Officer (see the section ‘How can you contact us about privacy?’).

In the event of an eligible data breach, we will assess the breach and respond to the incident in accordance with the Notifiable Data Breaches scheme under Part IIIC of the Privacy Act and, where required, notify affected individuals and the OAIC of such breach. We will also include our recommendations about the steps you should take in response to the breach in our notice to you.

How can you contact us about Privacy?

You can call us on 1800 625 644 send an email to privacyofficer@superconcepts.com.au or write to us at SuperConcepts Privacy Officer, GPO Box 9981, Adelaide SA 5001 to:

- seek more information about anything contained in this policy, or to request a printed copy
- ask about accessing or correcting the Personal Information we hold about you; or
- make a privacy related complaint.

To opt out of receiving direct marketing communications, please email marketing@superconcepts.com.au.

How do you find out about your Personal Information we hold?

You can access the Personal Information that we hold about you by calling, emailing or writing to us (see the section 'How you can contact us about privacy?'). We'll do our best to respond within 30 days; if it's going to take longer, we'll get in touch to let you know why and ask for more time. We may also need to verify your identity before providing access, to ensure that the Personal Information we hold is not improperly accessed.

There are some situations where we are allowed to refuse or limit your access to information. If that happens, we'll write to you and let you know why. Examples include where:

- giving access would have an unreasonable impact on the privacy of other individuals
- giving access would be unlawful, or where denying access is required or authorised by an Australian law or a court order
- both of the following apply:
 - we have reason to suspect that unlawful activity, or misconduct of a serious nature, that relates to our functions or activities has been, is being or may be engaged in; and
 - giving access would be likely to prejudice the taking of appropriate action in relation to the matter
- giving access is likely to interfere with law enforcement activities.

There is no charge for making a request to access your Personal Information. However, in some cases there may be a charge to cover the time we spend locating, compiling and explaining the information you ask for. If there is a charge, we'll give you an estimate up front and confirm that you wish for us to proceed.

How can you make a complaint about privacy?

If you ever have an issue or complaint in relation to privacy, please contact us via the contact channels listed at the start of this section.

We take privacy related complaints very seriously and consider all complaints carefully as part of our commitment to being open, honest and fair in dealing with your concerns. In most cases, we'll contact you within five working days of receiving your complaint to let you know what actions we are taking regarding the matter.

How can you escalate unresolved privacy complaints?

If you feel your complaint has not been satisfactorily addressed in the first instance, or that it is taking too long to resolve, you can ask for your concerns to be escalated to SuperConcepts Privacy Officer by email to privacyofficer@superconcepts.com.au or write to:

The SuperConcepts Privacy Officer
GPO Box 9981
Adelaide, SA, 5001

Alternatively, if your complaint is about how we handle your Personal Information, you can contact the Office of the Australian Information Commissioner – call 1300 363 992 or find them online at oaic.gov.au.

What about privacy and the internet?

Interactive tools

Our websites and mobile applications may provide you with interactive tools designed to help you. We may collect Personal Information you enter when using interactive tools on our website or through our mobile applications, or other provided services through our Platform.

Our mobile application may also send service-related and account-related push notifications. You can manage permissions and push notification settings through your device settings at any time.

What are cookies and how do we use them?

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, track the web pages you have visited including where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our websites, including presenting web pages according to your needs or preferences.

We use cookies to give you access to certain pages of the websites without having to log in each time you visit. We may also use external service providers to track the traffic and usage on the website. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser.

You may not be able to access some parts of our websites and certain features and functionalities may be affected if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Links to third party websites

Our websites and mobile applications may have links to external third-party websites that may benefit the user. External websites should contain their own privacy statements and we recommend you review them when using their websites. Please note, however, that third party websites are not covered by this policy, and these sites are not subject to SuperConcepts' privacy standards and procedures.

Website and mobile application analytics

We may use third party analytics software to analyse traffic to our websites and mobile applications, or to survey users of our sites and mobile applications.

Website and mobile application analytics may be used to collect such information as the number of unique visitors, how long visitors spend on the website or mobile application, device or browser information, operating system, application usage data, service interactions, security events, push-notification interaction data, diagnostic and crash information and common entry and exit points into and from the website and application.

Where supported by your device, our mobile application may allow you to use biometric authentication technologies, such as facial recognition or fingerprint authentication, to access the application. Biometric information used for authentication is not collected or stored by SuperConcepts.

This information is collected and aggregated by third party software and provided to us to assist in our analysis of our websites and mobile applications. We may use this information to provide, maintain, improve and develop our products and services. We may also use this information to offer you tailored content.

Information we collect when you are on our websites or using our mobile application, in addition to information we hold about you, may be associated with you. When information is associated with you, we treat it as Personal Information.

About this policy

This policy is effective as of 14 September 2026. We will update this policy when our information handling practices change, or from time to time, and any amendments will apply to the information we hold at the time of the update. We will post the updated policy on our website; we encourage you to check our website from time to time to view our current policy or contact us for a printed copy.

This policy incorporates the relevant provisions of the Privacy Act and the APPs. This policy applies to the following entities operating in Australia: Cavendish Administration Pty Ltd, Corporate Custodians Pty Ltd, MORE Superannuation Pty Ltd, SMA Tax & SMSF Services Pty Ltd, SMSF Administration Solutions Pty Ltd, SMSF Managers Pty Ltd, SMSF Operations Pty Ltd, Super IQ Pty Ltd, SuperConcepts Pty Ltd, SuperConcepts Administration Pty Ltd, SuperConcepts Holding Co Pty Ltd, SuperConcepts Software Services Pty Ltd, Maui Bidco Pty Ltd, Maui Finco Pty Ltd, Fairway Holdco Pty Ltd.



Postal Address
GPO Box 9981
Adelaide SA 5001

Phone 1300 023 170
Email Privacyofficer@superconcepts.com.au
Website www.superconcepts.com.au/container/privacy