

VFMC Privacy Policy

April 2021



Improving the future prosperity of Victoria

1 About this Policy

At VFMC, we value the privacy of every individual and are committed to managing and safeguarding personal information, in line with our obligations under privacy laws.

VFMC was established under the Victorian Funds Management Corporation Act 1994. We are a public authority responsible for investing for the benefit of Victorians. Our primary statutory function is to provide funds management and other financial services for the State of Victoria and for Victorian public authorities and related organisations. We collect, use, disclose and handle personal information for the purpose of providing these services.

This policy outlines how we manage the collection, use, disclosure, storage and handling of personal information.

The Privacy and Data Protection Act 2014 (Vic) and Health Records Act 2001 (Vic) both apply to VFMC. We use the term 'personal information' in this policy to also include 'health information', allowing us to cover the information about individuals which is protected by both of those Acts.

2 Collection of personal information

VFMC collects personal information about individuals including our employees, those employed by a VFMC service provider or a client, those who apply for a job, those who visit our website or send us an email, and other members of the public who interact with us.

The types of personal information we collect include:

- name
- contact details – e.g. address, email, telephone number
- identification details – e.g. tax file numbers for our employees
- organisation and position
- financial details – e.g. bank and superannuation account details
- activity and communications – details of your transactions, interactions, communications, enquiries, complaints and activity with us or relating to us, including any contact by telephone, email or online and activity at our websites and physical sites
- work conduct and performance
- CV information – e.g. education, employment history, skills
- background checks – e.g. police checks, criminal history records, financial history, professional registrations/memberships, references, directorships, eligibility to work
- payroll and leave information about our employees, which may include health information in connection with personal leave.

We collect personal information in various ways, including from individuals directly and from third parties and public sources.

Sometimes we collect personal information pursuant to laws relating to tax, superannuation, employment, health and safety, insurance, and workers compensation.

3 Use and disclosure of personal information

The purposes for which we use and disclose personal information include:

- providing our services including funds management, investment advice, environmental, social and governance (ESG) advice, proxy voting
- considering and entering into financial transactions – e.g. investments on behalf of our clients
- communicating with individuals or their organisation
- record-keeping and updating
- conducting identity and background checks as required by law or for risk management purposes
- protecting the safety and security of our people, clients, sites and assets
- workforce management and administration – e.g. recruitment, training, payroll
- conducting investigations and reviews – e.g. in relation to misconduct or unlawful activity
- complying with our legal obligations and protecting and defending our legal rights and interests
- other purposes as required or authorised by law.

We may be limited in our ability to do these things if we are unable to collect personal information.

The third parties to which we disclose personal information include:

- representatives of individuals or of VFMC
- professional advisers – e.g. auditors and lawyers
- service providers – e.g. providers of digital and technology, data, recruitment, payroll, research, insurance, background check, investigation, training, delivery, banking and archival services
- clients – e.g. sharing of limited personal information about relevant VFMC employees
- external fund managers
- custodians
- administrators
- entities that we invest in on behalf of our clients
- government agencies – e.g. the Department of Treasury & Finance
- referees and parties seeking references.

We sometimes also collect personal information from these parties.

In some cases, our contracted service providers will have direct responsibility for their handling of personal information. Individuals can contact us in the first instance if they have any concerns about the handling of personal information by our contracted service providers.

We may release personal information outside Victoria including where VFMC enters into agreements with interstate and international fund managers or international service providers including custodians and administrators. We are subject to strict controls on when we can transfer personal information to recipients outside Victoria. For example, we may need to ensure the recipient is subject to similar privacy requirements, either under its own laws, or under contractual requirements we impose.

4 Protection of personal information

We are subject to strict requirements about the protection of personal information from misuse and loss, and from unauthorised access, modification, and disclosure, including the Victorian Protective Data Security Framework.

Some of the security measures we employ include confidentiality requirements on our employees, security policies and processes, physical security (e.g. secure VFMC office and off-site archiving facilities), information security, and ICT security measures.

We also have a Records Management Policy in place which outlines the requirements for retention/destruction of records in accordance with legislative requirements.

We take various steps to ensure the personal information we handle is accurate, complete and up-to-date, however some reliance is placed on service providers and clients to provide up-to-date information on changes within their organisations.

5 Our website

VFMC uses Google Analytics as our web measurement service provider. Google Analytics uses a first-party cookie and JavaScript code to collect information about visitors to this website. For more about how Google collects and processes data, and your privacy choices with Google, please see Google's privacy policy and their information at www.google.com/policies/privacy/partners/.

Cookies used by this website are enabled by default because of their integration into the website. If you do not wish to have cookies placed on your computer, you can disable them using your web browser. You will need to customise each web browser you use to turn off cookie tracking.

Google have also provided the [Google Analytics Opt-Out Browser Add-On utility](#) for most common web browsers. If you want to prevent your browsing data from being collected by Google Analytics, please [install the relevant add on](#).

If you opt out of using cookies, you will still have access to all information and resources on this website. The data collected about visitors to this website may be aggregated and used by VFMC to determine how visitors use our website.

6 Further assistance and access to your personal information

If you have any further queries about privacy, you can contact us as follows:

Chief Risk Officer
Victorian Funds Management Corporation
Level 13,
101 Collins Street
MELBOURNE, VIC 3000
AUSTRALIA

Email: riskcompliance@vfmc.vic.gov.au

Phone: +61 3 9207 2900

You can contact us if you wish to request access to personal information we hold about you, to correct or update that information, or if you have any queries or concerns about the handling of your personal information.

Victorian Funds Management Corporation (VFMC)
Last updated: April 2021