

1 Client Relationship Management

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1.1 Privacy Policy

The privacy of personal information is important at Mutual Trust. All staff are committed to respecting clients right to privacy and protecting their personal information. Mutual Trust Proprietary Limited and its wholly owed subsidiaries, (“Mutual Trust”) is bound to the National Privacy Principles in the Privacy Act 1988 (Commonwealth) as well as other applicable laws and codes affecting clients’ personal information.

All staff are expected to respect clients’ privacy in accordance with our policies and procedures. Any breach will result in termination of employment and possible legal proceedings. Any queries should be referred to the Privacy Officer or CEO.

1.1.1 Collecting Clients’ Personal Information

From time to time, Mutual Trust collects and holds personal information for the purposes of:

- providing the client with a relevant product or service
- managing and administering a service

The information collected may include the clients’ name, postal or email address, date of birth, financial details, Tax File Number, proof and verification of identity or other information that Mutual Trust considers necessary.

A copy of the Mutual Trust’s Privacy Policy is available on request to the Privacy Officer, Mutual Trust, Level 33, 360 Collins St, Melbourne, Victoria, 3000.

Where it is reasonable or practicable to do so, staff will collect client’s personal information from them directly. However, this may also be obtained from completed product or service applications, administrative forms or when clients provide personal information over the telephone, or through Mutual Trust’s website.

Outgoing communications will include where appropriate a confidentiality statement and reference to this Privacy Policy.

1.1.2 Keeping Client Personal Information Accurate and Up-to-date

It is essential that client information is kept as accurate, complete and up-to-date as possible. All staff are expected to maintain this information by entry into common databases, with the aim of providing better client service.

1.1.3 Protection of Personal Information

Client information is stored in paper and electronic form and all staff must protect it from misuse, loss, unauthorized access, modification or disclosure.

Personal information is protected in the following ways:

- confidentiality requirements for employees
- confidentiality statements on outgoing correspondence as appropriate, including email
- document storage security policies
- security measures for systems access
- providing a discrete environment for confidential discussions
- only allowing access to personal information where the individual seeking access has satisfied Mutual Trust's identification and access requirements.

1.1.4 Policy On Release Of Client Information

Any queries regarding client information must come from the client themselves or the person to whom enquiring authority has been granted by the client. This should be verified prior to sharing of information by seeing the person (if they are known to you) or if they call on the phone: by requesting the client's address which will be checked against our records or if staff have a long relationship with the client, by voice recognition. If staff are still uncertain of the identity of the caller, you should request the client's date of birth and check this against the client records, or request other client specific verifiable information and also check against the client records.

In respect to Estates, only the Executor of the Estate can authorise release of any information on that estate, to beneficiaries or other persons.

In respect to Trusts, only the Trustees can authorise release of any information on that trust to beneficiaries or other persons if it is not specified in the Deed of the Trust. Should Mutual Trust be an appointed Trustee, all enquiries must be directed to the CEO, or one of his direct reports prior to the release of any information.

This includes information taking any form including verbal, email, hard copy, soft copy and facsimile.

1.1.5 Client Access to their Personal Information

Team members may provide information to clients upon request if it is within their role to do so. Any query regarding personal information that falls outside that authority should be directed to the CEO, or one of his direct reports.

All team members need to be aware that this is subject to some exceptions allowed by law. Factors that limit a right to access personal information include:

- a frivolous or vexatious request
- access would pose a serious threat to the life or health of any individual
- access would have an unreasonable impact on the privacy of others
- access constitutes a breach of law
- legal dispute resolution proceedings

Should any team member be unsure whether to release such information, the client's request should be referred to the CEO or to one of his direct reports. That person will contact the client and will provide the client with reasons if access is denied.

1.1.6 Sharing of Confidential Information Between Companies

In the course of business, Mutual Trust will need to share information with other business organisations to meet clients instructions. In these circumstances the following process will be adhered to at all times:

- 1) All outgoing correspondence faxed or emailed will include a confidentiality statement and reference to this Privacy Policy.
- 2) Authority to disclose client information will need to be obtained from the CEO or one of his direct reports and will be limited to client service matters.
- 3) The CEO will initiate and ensure appropriate procedures, process are in place for Mutual Trust Group companies.
- 4) If a confidentiality agreement is required, information is only to be shared once this agreement is completed and signed by both parties. The information will shared will be limited to client service matters.
- 5) Where personal information is disclosed, all staff will ensure that the information is held, used or disclosed consistently with the Privacy Policy and other applicable Privacy Laws and Codes.

1.1.7 Resolving A Client's Privacy Issues

If clients have any issues they wish to raise with Mutual Trust or would like to discuss any issues about this Privacy Policy they are to speak directly to their Manager. The staff member will do his/her best to resolve any issues and actions taken will be documented with a copy forwarded to the CEO (see Section 6.7 for the policy and procedures for handling of complaints).

If further investigation is required, the CEO and the client's Manager will work together to resolve the issue. The client's Manager will conduct necessary investigation and he/she will keep the client advised of progress.

If the matter remains unresolved, the CEO will work directly with the client to facilitate an appropriate resolution.

Privacy Officer

The Privacy Officer for Mutual Trust is appointed by the CEO. He/she will act as a resource for staff on issues relating to the Privacy Act 1998 and ensure policies and procedures are in place to protect the privacy of clients' information.

The Privacy Officer will document and maintain records of any issues relating to the privacy and security of client information. This includes yearly review of all issues pertaining to the handling and protection of sensitive client information.

Examples include:

- Maintenance of filing system
- Destruction of sensitive material
- Monitoring of back up procedures for IT files
- Review of any systematic issues relating to client complaint reports or variances in procedure reports which relate to privacy issues
- Feedback on privacy issues submitted to the email address invest@mutualtrust.com.au is acted upon as per Section 6.7.