

# Privacy Policy

## Definitions in this Privacy Policy

'our', 'us' and 'we' refers to The Hollard Insurance Company Pty Ltd, ABN 78 090 584 473 (Hollard), of Level 12, 465 Victoria Ave, Chatswood, NSW, 2067, Australia, and its Related Companies.

'Personal Information' is any 'information or an opinion about an identified individual, or an individual who is reasonably identifiable:

- whether the information or opinion is true or not; and
- whether the information or opinion is recorded in a material form or not.

'Related Companies' has the same meaning as related bodies corporate and the meaning in section 50 of the Corporations Act 2001 (Cth).

'Sensitive Information' is a sub set of Personal Information defined as:

- a. information or an opinion about an individual's:
  - i. racial or ethnic origin; or
  - ii. political opinions; or
  - iii. membership of a political association; or
  - iv. religious beliefs or affiliations; or
  - v. philosophical beliefs; or
  - vi. membership of a professional or trade association; or
  - vii. membership of a trade union; or
  - viii. sexual orientation or practices; or
  - ix. criminal record
- b. health information about an individual; or
- c. genetic information about an individual that is not otherwise health information; or
- d. biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- e. biometric templates.

'you' and 'your' refers to our customers and prospective customers. It also refers generally to users of our websites as well as a person sharing their information with us, such as a third party or an agent acting on behalf of you.

## Our Commitment

We recognise that your privacy is very important to you we are committed to ensuring the privacy of your Personal Information.

The Privacy Act details Australian Privacy Principles that set minimum standards for how private sector organisations such as us should collect, use, disclose, store, provide access to and correction of Personal Information.

This Privacy Policy outlines how we manage your Personal Information.

## Currency and Status of our Privacy Policy

Our current Privacy Policy is detailed below. It is current as of and from 20 August 2019. We recommend that you read it thoroughly.

By visiting our website, applying for, renewing or using any of our products or services, making a claim or providing us with your Personal Information, you agreed to your Personal Information being collected, held, used and disclosed as set out in this Privacy Policy.

This policy may change from time to time and all changes will be posted on our websites so please check it periodically. Alternatively, you can call us at **1300 034 888**, email our privacy officer at **privacy@hollard.com.au** or **customercare@hollard.com.au** or write to **Locked Bag 2010, St Leonards NSW 1590** and request a copy of our most recent policy. Whenever using our websites you should read this policy in conjunction with our collection notification and the relevant website's terms of use

## Types of Personal Information we collect

The Personal Information we collect depends on the products and services we offer you or you use or apply for (and may also require us to collect Personal Information about other people such as a co-insured, or your spouse, partner or children). Typically the details we collect and hold include your name, contact details (address, phone and fax number, email address), date of birth, gender and payment details. We may also collect information that is specific to a particular product.

The type of Sensitive Information we may collect generally include the following (where it is relevant to underwriting an insurance policy or dealing with, managing, or processing a claim):

- Criminal record;
- Health information;
- Sexual practices; and
- Membership of a professional or trade association or trade union.

## Why we collect your Personal Information

We collect Personal Information to provide, offer and administer our various products and services, or otherwise as permitted by law. Such purposes include responding to your enquiries, providing you with assistance you request of Us, maintaining and administering our products and services (for example processing requests for quotes, applications for insurance, underwriting and pricing policies, issuing you with a policy, managing claims, processing payments); processing your survey or questionnaire responses; market research and the collection of general statistical information using common internet technologies such as cookies; providing you with marketing information regarding other products and services (of Ours or a third party); quality assurance and training purposes; performing administrative operations (including accounting and risk management) and any other purpose identified at the time of collecting your information.

We will only collect 'Sensitive Information' where it is relevant to underwriting an insurance policy or dealing with, managing, or processing a claim. We may use or disclose it by giving it to Related Companies and our appointed third parties for research and analysis and to design, test or underwrite new insurance products or features. Your Sensitive Information will not be used or disclosed for any other purpose unless we have your permission.

We may combine or link Personal Information we already hold about you to other Personal Information we collect about you. Third party marketing service providers may combine the Personal Information we disclose to them with information they already hold about you in order to provide you with more relevant advertising about our or their products and services.

Third parties are prohibited from using your Personal Information for purposes other than those for which it is supplied.

If you do not consent to us collecting, using or disclosing all or some of the Personal Information we request, we

may not be able to provide you with our products or services such as processing your application for insurance, your claim or any payment due to you. It may also prevent us from maintaining or administering your policy or the provision of information regarding our products or services or those of any third party.

## How we collect your Personal Information

We collect your Personal Information from you in various ways and at several different points, such as telephone conversations (including any form of mobile phone text messaging), our websites, electronic devices or communication and hard copy forms.

Unless it is unreasonable or impracticable for us to do so, we collect your Personal Information directly from you. There may, however, be occasions where we collect your Personal Information from someone else.

Collection of your Personal Information may include us collecting from:

- Our authorised representatives;
- Our distributors or referrers, agents, business partners and affiliates, other insurers, or Related Companies;
- Our service providers;
- third parties for the purposes of assessing a claim or providing you with insurance cover or other services;
- Your travel consultant/agent, travel service providers, airlines, hotels, providers of transportation, providers of medical and non-medical assistance and services;
- another party involved in a claim;
- family members or anyone we have authorised to deal with us on your behalf;
- Our legal or other advisers;
- social media and other virtual communities and networks where people create, share or exchange information;
- the Australian Financial Complaints Authority or any other external dispute resolution body;
- policy holders or others who are authorised or noted on the policy as having a legal interest in it, including where you are an insured person under the policy but not the policy holder or another insured where the policy is issued in joint names;
- clubs, associations, member loyalty or rewards program providers and other relevant organisations;
- publicly available sources of information;
- data partners, analytic consultants and other similar organisations;

- any other organisation or person where you have consented to them providing your Personal Information to us or consented to us obtaining Personal Information from them.

If you provide Personal Information to us about another person, we rely on you to have made or make them aware that you will, or may, provide their information to us and the types of third parties. We may provide it to, the relevant purposes we and any of the third parties will use it for and how they can access it. If it is Sensitive Information we rely on you to have obtained their consent on these matters. If you have not done, or will not do, either of these things, you must tell us before you provide the relevant Personal Information.

A number of interactive tools or facilities may be available on our websites. If you use any of these tools or facilities, we generally do not collect your Personal Information unless a particular tool permits you to suspend or save information and recover those details at a later time. In these circumstances, your Personal Information may be retained on our systems but is not processed or used by us except that it may be used for the purposes of online quoting and subsequent follow up.

From time to time we may request Personal Information from you through competitions or surveys. Participation in these competitions or surveys is completely voluntary and you therefore, have the choice of whether or not you disclose the Personal Information requested. We may use Personal Information we collect through competitions to determine prize winners, award prizes and notify winners. We use Personal Information we may collect through surveys or questionnaires to assess your satisfaction with our products and services and to determine how we may be able to better service your needs.

## **Anonymity and Pseudonymity**

Unless it is impracticable, you have the option of interacting with us anonymously or by the use of a pseudonym. For example, you may visit and browse our websites and use some of our online facilities without having to reveal any Personal Information.

## **Cookies and our collection of information through our website**

We may use a cookie that collects anonymous traffic data. A cookie is a message given to a web browser by a web server which is then stored by the browser in a text file. Each time the browser requests a page from the server this message is sent back which enables the user's computer address (IP address) to be identified.

We may use the information provided by cookies and IP addresses to analyse trends, administer the site, or for

research and marketing purposes to help us improve our product and service offerings. No information which personally identifies you will be collected through the cookies. You can set your browser to notify you before you receive a cookie so you have the chance to accept it and can set your browser to turn off cookies. No information which personally identifies you will be collected as part of these cookies.

We may also collect your information through your use of online forms. Some forms are provided by third parties who may have access to your Personal Information but will only disclose that information to us in accordance with their Privacy Policy, or as they are lawfully required.

## **Direct Marketing**

On occasion, we may use your Personal Information to provide you with information about the products and services we or our distributors, referrers, agents, business partners, affiliates and any proposed new or incoming insurer may offer. If you do not wish to receive any of this information you can at any time let us know by contacting us.

We never sell, rent or trade Your Personal Information.

We may share Your Personal Information with Our Related Companies and other third parties who provide services to Us or on Our behalf.

## **Collecting, Sharing and Disclosing your Personal Information**

We may collect Personal Information from and/or share your Personal Information with our Related Companies and other third parties who provide services to us or on our behalf.

We may collect and/or share your Personal Information with other third parties or any unrelated party under the following circumstances:

- in accordance with this Privacy Policy;
- as provided in any collection notice we give You;
- where you have provided your consent (which may be given expressly or may reasonably be implied by your conduct or our existing business relationship);
- for purposes related to: research (including market research), planning, service development, security, testing and risk management;
- where a product or service you apply for is provided or supplied by or through a third party;
- where a third party, such as a mailing house, carries out activities on our behalf;
- if disclosure is otherwise required in order to provide you with a particular product or service;

- where information is received from another insurer (for reasons including to assess insurance risks or to assist with an investigation);
- in order to ensure our ability to continue providing products and services;
- Your travel consultant/agent, travel service providers, airlines, hotels, providers of transportation, providers of medical and non-medical assistance and services;
- if disclosure is required for the purposes of conducting business analysis in order to improve our products and services;
- if disclosure is required by law or requested by statutory, regulatory or ombudsman authorities or law enforcement agency;
- to an insurance broker or agent acting on your behalf or who you have designated to act on your behalf;
- where a third party has an interest in the product or service we supply, for example a mortgagee, referral agent, third party beneficiary, distributor, insurance intermediary, business partner, affiliate or any other insurer;
- Our professional advisors including our accountants, auditors and lawyers, contracted advisors and service providers;
- where a third party acquires, or considers acquiring, an interest in Us;
- where we are authorised, required or permitted by law to use or disclose information; and
- where it is necessary for a third party to assist us in providing our services, for example, reinsurers, insurance intermediaries, insurance reference bureaus, lawyers, accountants, loss adjusters and others involved in the providing of services or claims handling processes.

Your Personal Information may also be disclosed to some of our service providers who are located overseas. Who they are may change from time to time and we may need to disclose Personal Information to other countries not listed. At the date of this document our overseas providers included New Zealand, France, Germany, Canada, Bulgaria and the Philippines. You can contact us for a detailed listing. We aim to protect your Personal Information by taking reasonable steps to ensure that the overseas service provider has similar protections in relation to privacy or that we enter into contractual arrangements with the recipient that safeguards and ensures compliance with Australian privacy law and this Privacy Policy. However, in some cases we may not be able to take reasonable steps to ensure they do not breach the Privacy Act and they may not be subject to the same level of protection or obligations that are offered by the

Privacy Act. By proceeding to acquire our services and products you agree that you cannot seek redress under the Act or against us (to the extent permitted by law) and may not be able to seek redress overseas.

Related and unrelated third parties to whom your Personal Information is disclosed are required to keep the information confidential and only use it for the same purposes as we are permitted to use it.

## **Quality and Security of your Personal Information**

We aim to ensure that your Personal Information is accurate, complete and up to date.

During the course of your relationship with us we will ask you to inform us of any changes to your Personal Information. You should however contact us at any time to update your Personal Information or advise us that the information we have is not accurate or complete.

We are committed to keeping your Personal Information secure and will use all reasonable precautions to protect it from loss, misuse, interference and unauthorised access, modification or disclosure including:

- Physically securing external and internal premises;
- Maintaining computer and network security (such as user identifiers and passwords) to control access to computer systems;
- Restricting access to your Personal Information to employees or those who perform services on our behalf who are authorised to handle your Personal Information and on a 'need to know' basis;
- Entering into confidentiality agreements with relevant employees and third parties;
- Appropriate training of staff;
- Retaining your Personal Information for no longer than it is reasonably required to service a policy or continue to provide any products and services to you unless we are required by law or any contractual obligation to retain it for longer; and
- Taking reasonable steps to destroy or de-identify Personal Information that we no longer require or which was unsolicited and we identify that we would not have otherwise collected it from you.

## **Access to and correction of your Personal Information**

You may generally access the information we hold about you and request corrections. This right is, subject to the exceptions detailed in the Australian Privacy Principles. For example, we may refuse access where the:

- information may have an unreasonable impact on the privacy of others;
- request is frivolous or vexatious;
- information relates to existing or anticipated legal proceedings and would not be accessible by the process of discovery in those proceedings; or
- the information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

If we refuse you access, or to give access in the manner requested by you we will let you know why in writing.

Where providing access would reveal evaluative information in connection with a commercially sensitive decision-making process, we will provide an explanation for the decision rather than direct access to the information.

In most cases, you may access your Personal Information at no cost to you by contacting our privacy officer at [privacy@hollard.com.au](mailto:privacy@hollard.com.au), write to **Locked Bag 2010, St Leonards NSW 1590** or by calling our privacy officer on **1300 034 888**. For access to complex or Sensitive Information or more detailed requests for access to your Personal Information, for example, access to information that is archived, we may require you to place your request in writing and charge you a fee for our reasonable costs of retrieving and supplying the information to you.

In all cases you will be asked to verify who you are before your Personal Information is provided. All requests for Personal Information will be handled in a reasonable period of time.

## **How to contact us including Complaints**

If you have any questions, suggestions or complaints about our privacy practices (including a complaint about a breach of the Privacy Act or Australian Privacy Principles) or this Privacy Policy, you can either email our privacy officer at [privacy@hollard.com.au](mailto:privacy@hollard.com.au), write to **Locked Bag 2010, St Leonards NSW 1590** or call our privacy officer at **1300 034 888**. We will respond to your question, suggestion or complaint as soon as possible.

If you are not satisfied with our response to your enquiry or complaint you can contact the Privacy Officer and request that it be reviewed by a senior staff member who will endeavour to resolve your dispute within 30 days. If you are still not satisfied we will tell you about any external dispute resolution avenues which may be available to you.

Dated: 20 August 2019