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PRIVACY POLICY

At **Austgroup Insurance Brokers**, we are committed to protecting your privacy in accordance with the Privacy Amendment (Private Sector) Act 2000. This Privacy Policy describes our current policies and practices in relation to the handling and use of personal information.

What information do we collect and how do we use it?

Austgroup Insurance Brokers are required to meet particular legislative and regulatory requirements. In order to provide comprehensive advice to you, we are required to collect certain personal information from you.

- Providing you with the relevant product or service
- Managing and administering the product service
- Protecting against fraud

Austgroup Insurance Brokers collects information in a number of ways, including:

- Directly from you, when you attend a face to face interview
- Directly from you, when you provides information through a data collection form
- Directly from you, when you provide information by phone
- Directly from you via email or the internet; and
- Directly from fund managers, superannuation companies, life insurance companies and other product issuers once authorization has been provided by you.

We provide any information that the insurers or intermediaries who we ask to quote for your insurances and premium funding require to enable them to decide whether to insure you and on what terms. Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia.

When you make a claim under your contract of insurance, we assist you by collecting information about your claim. Sometimes we also need to collect information about you from others, although you have a right to refuse us authorisation do this. We may provide this information to;

- your insurer or anyone who your insurer has appointed to assist it to consider your claim i.e. loss adjusters, medical advisers etc, to enable it to consider your claim;
- reinsurers and insurance reference bureaus;
- compliance consultants to ensure that our representatives are meeting our compliance standards;
- temporary staff to handle workloads during peak periods;
- your professional advisers as authorised by you;
- information technology service providers to maintain, review and develop our business systems, procedures and infrastructure including testing or upgrading our computer systems;
- government and regulatory authorities and other organisations, as required or authorised by law;
- another authorised representative of Austgroup Insurance Brokers if necessary; or
- a potential purchaser/organisation involved in the proposed sale of our business for the purpose of due diligence, corporate re-organisation and transfer or all or part of the assets of our business;

We also use your information to send you requested product information and promotional material and to enable us to manage your ongoing requirements, e.g. renewals, and our

relationship with you, e.g. invoicing, client surveys etc. We may do so by mail or electronically unless you tell us that you do not wish to receive electronic communications.

We may occasionally notify you about new services and special offers, events or articles we think will be of interest to you. We may send you regular updates by email or by post on insurance matters. If you would rather not receive this information, email or write to us as we maintain a Register for those individuals not wanting to receive marketing material.

We may use your information internally to help us improve our services and help resolve any problems.

The Corporations Act has provided the Australian Securities and Investments Commission with the authority to inspect certain personal information that is kept on our files about you.

What if you don't provide some information to us?

We can only fully advise you if we have all relevant information. If you provide inaccurate or incomplete information we may not be able to provide you with the products or services you are seeking.

The insurance laws also require you to provide your insurers with all the information they need in order to be able to decide whether to insure you and on what terms.

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

How do we hold and protect your information?

We strive to maintain the reliability, accuracy, completeness and currency of the personal information we hold and to protect its privacy and security. We keep personal information only for as long as is reasonably necessary for the purpose for which it was collected or to comply with any applicable legal or ethical reporting or document retention requirements.

We hold the information we collect from you within our computer system.

We ensure that your information is safe by restricting access to our computer system to staff only with all systems being passwords protected as well as our offices having appropriate security.

It is a legislative requirement that we keep all personal information and records for a period of 7 years. Should you cease to be a client of ours, we will maintain your personal information on or off site in a secure manner for 7 years. After this, the information will be destroyed.

Will we disclose the information we collect to anyone?

We do not sell, trade, or rent your personal information to others.

We may need to provide your information to contractors who supply services to us, e.g. to handle mailings on our behalf or to other companies in the event of a corporate sale, merger, re-organisation, dissolution or similar event. However, we will do our best to ensure that they protect your information in the same way that we do.

We may provide your information to others if we are required to do so by law or under some unusual other circumstances which the Privacy Act permits.

Circumstances when your information may not be available for access

Some exceptions exist where we will not provide you with access to your personal information if:

- providing access would pose a serious threat to the life or health of a person
- providing access would have an unreasonable impact on the privacy of others
- the request for access is frivolous or vexatious
- the information is related to existing or anticipated legal proceedings between us and would not be discoverable in those proceedings
- providing access would reveal our intentions to negotiations with you in such a way as to prejudice those negotiations
- providing access would be unlawful

- denying access is required or authorized by or under law
- providing access would likely prejudice certain operations by or on behalf of an enforcement body or an enforcement body requests that access not be provided on the grounds of national security

How can you check, update or change the information we are holding?

Upon receipt of your written request and enough information to allow us to identify the information, we will disclose to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate.

If you wish to access or correct your personal information please write to our Privacy Officer, at the address stated below.

Some exceptions exist under the Privacy Act where we will not provide you with access to your personal information. Should we refuse you access to your personal information, we will provide you with a written explanation for that refusal.

We do not charge for receiving a request for access to personal information or for complying with a correction request. We do not charge for providing access to personal information however we reserve the right to charge a fee should there be any resultant work that comes from accessing this information.

Sensitive Information

Without your consent we will not collect information about you that reveals your racial or ethnic origin, political opinions, religious or philosophical beliefs or affiliation's, membership of professional or trade association, membership of a trade union, details of health, disability, sexual orientation, or criminal record.

This is subject to some exceptions including:

- the collection is required by law; and
- when the information is necessary for the establishment, exercise or defence of a legal claim.

Transborder dataflow

Austgroup Insurance Brokers' takes its obligations to protect information seriously, this includes when we operate throughout Australia and overseas, as part of our operations some uses and disclosures may occur outside your State or territory and/or outside of Australia. In some circumstances we may need to obtain your consent before this occurs.

Government identifiers

Although in certain circumstances we are required to collect government identifiers such as your tax file number, Medicare number or pension card, we do not use or disclose this information other than when requires or authorised by law or unless you have voluntarily consented to disclose this information to a third party.

Your consent

By asking us to assist with your insurance needs, you consent to the collection and use of the information you have provided to us for the purposes described within this Privacy Policy.

You can deal with us anonymously where it is lawful and practicable to do so. For example, if you telephone requesting our postal address.

Our website

Our website provides links to third party websites. The use of your information by these third party sites is not within the control of Austgroup Insurance Brokers and we cannot accept responsibility for the conduct of these organisations. Other websites are not subject to our privacy standards, policies and procedures. You will need to contact or review those websites directly to ascertain their privacy stands, policies and procedures.

Our website utilises cookies to provide you with a better user experience. Cookies allow us to identify your browser while you are using our site –they do not identify you. If you do not wish to receive cookies, you can instruct your web browser to refuse them.

Spam Act

Spam is a generic term used to describe electronic 'junk mail'- unwanted messages sent to a person's email account or mobile phone. In Australia, spam is defined as 'unsolicited commercial electronic messages'.

Electronic messaging covers emails, instant messaging, SMS and other mobile phone messaging, but not cover normal voice-to-voice communication by telephone. We comply with the provisions of the Spam Act when sending commercial electronic messages.

Equally importantly, we make sure that our practices are in accordance with the National Privacy Principles in all activities where they deal with personal information.

Internal Procedure for dealing with complaints

The three key steps we follow are:

- Consent – Only commercial electronic messages are sent with the addressee's consent – either express or inferred consent.
- Identify – Electronic messages will include clear and accurate information about who is responsible for sending the commercial electronic message.
- Unsubscribe – We ensure that a functional unsubscribe facility is included in all our commercial electronic messages and deal with unsubscribe requests promptly.

Consented to such communications

Commercial messages will only be sent to you when you have given consent. This may be express consent – a direct indication that it is okay to send the message, or messages of that nature or inferred consent based on our business or other relationship with you and your conduct.

Comply with the law regarding viral messages

We ensure that commercial communications that include a forwarding facility contain a clear recommendation that the recipient should only forward the commercial communication to persons with whom they have a relationship, where that relationship means that person could be said to have consented to receiving commercial communications.

Laws that requires particular information to be collected

The Privacy Amendment (Private Sector) Act, 2012 sets out a number of Australian Privacy Principles (APPs). Our aim is to both support and ensure that we comply with these principles. Further information on privacy in Australia may be obtained by visiting the website of the Office of the Federal Privacy Commissioner at <http://www.privacy.gov.au>.

As a financial services organization we are subject to certain legislative and regulatory requirements which necessitate us to obtain personal information about you, including s945A of the Corporations Act.

We collect information about you for the purpose of reporting to AUSTRAC under the Anti-Money Laundering and Counter terrorism Financing Act 2006.

Direct marketing material

If at any time, you do not wish to receive this information any further, you may contact us with this request. We will endeavour to meet your request within two weeks. We maintain a register for those individuals not wanting direct marketing material.

In the event of the intended sale of business

In the event of that we propose to sell the business, we may disclose your personal information to potential purchasers for the purpose of them conducting due diligence investigations. Disclosure will be made in confidence and it will be a condition of that disclosure that no personal information will be used or disclosed by them.

Tell us what you think

We welcome your questions and comments about privacy and advise that you may request a free copy of this Privacy Policy at any time.

Please contact our Privacy Officer if you wish to complain about any breach or potential breach of your privacy rights. Your complaint will be responded to within 7 days. If you are not satisfied with the outcome of your complaint, you are entitled to contact the Office of the Privacy Commissioner.

We encourage you to check our website regularly for any updates to our Privacy Policy.

Privacy Officer: Frank Starvaggi
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