

## 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 being the underwriter of the Australian Seniors Insurance Agency (ASIA) branded Home/Contents, Landlord Insurance and Car Insurance products

'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:

- information or an opinion about an individual's:
  - racial or ethnic origin; or
  - political opinions; or
  - membership of a political association; or
  - religious beliefs or affiliations; or
  - philosophical beliefs; or
  - membership of a professional or trade association; or
  - membership of a trade union; or
  - sexual orientation or practices; or
  - criminal record; or
- health information about an individual; or
- genetic information about an individual that is not otherwise health information.; or
- biometric information that is to be used for the purpose of automated biometric verification or biometric identification; or
- biometric templates.

'You' and 'Your' refers to Our customers and prospective customers. It also refers generally to users of Our web sites.

## Our Commitment

We recognise that Your privacy is very important to You. We are committed to protecting the privacy of Your Personal Information in accordance with the Privacy Act 1988 (Cth).

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.

We are committed to complying with the Australian Privacy Principles.

## Currency and Status of Our Privacy Policy

Our current privacy policy is detailed below. It is current as of and from 12 March 2014. We suggest that You read it thoroughly.

This policy may change from time to time and all changes will be posted on Our web sites so please check it periodically. Alternatively, You can call Us at 13 13 43, email Our privacy officer at [privacy@hollard.com.au](mailto:privacy@hollard.com.au) or [customercare@hollard.com.au](mailto:customercare@hollard.com.au) or write to PO Box 199, Chatswood NSW 2057 and request a copy of Our most recent policy. Whenever using Our web sites You should read this policy in conjunction with Our collection notification and the relevant web site's terms of use.

## Personal Information We collect, how and why We use it

The Personal Information We collect depends on the products and services We offer You or You use or apply for. 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.

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.

If You do not consent to Us collecting and using 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.

We will only collect or use 'Sensitive Information' to consider Your application for insurance, assess a claim, using it or giving it to Related Companies and Our appointed third parties for research and analysis and to design or underwrite new insurance products. Your Sensitive Information will not be used or disclosed for any other purpose unless We have Your permission. Third parties are prohibited from using Your personal information for purposes other than those for which it is supplied.

Unless it is unpractical, 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.

We collect Your Personal Information from You in various ways and at several different points, including via telephone, Our website, hard copy forms or email.

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. This may include Our authorised representatives, Our distributors or referrers, agents or Related Companies, service providers, another party involved in a claim, family members, anyone You have authorised to deal with Us on Your behalf, and/or Our legal or other advisers. For example, where You make an application in joint names, where it is provided to Us by a third party with Your consent or where We need to obtain information from professional experts for the purposes of assessing a claim or providing You with insurance cover or other services.

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 web sites. 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.

## **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**

We or Our Related Companies and other third parties who provide services to Us or on Our behalf will only use Your Personal Information to provide You with information about ASIA branded Home/Contents, Landlords Insurance and Car Insurance products. If You do not wish to receive any of this information You can at any time let Us know by contacting Us. We and Our Related Companies and other third parties who provide services to Us or on Our behalf will not contact You except in relation to matters concerning those products.

ASIA may use your Personal Information (but not Sensitive Information) to assist them in developing and identifying products and services that may interest you and (unless you ask them not to by calling them on (03) 9503 5544 or email at mail@seniors.com.au) telling you about products and services offered by ASIA.

## Sharing and Disclosing Your Personal Information

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.

We will not share Your Personal Information with any unrelated party except 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;
- in order to ensure Our ability to continue providing products 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 or insurance intermediary;
- 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;
- 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;

We take all reasonable steps to ensure Our service providers comply with obligations similar to the Australian Privacy Principles. We do not usually send Personal Information to other parties outside of Australia. If You need us to or We need to send information to another country We will only do so as outlined in the relevant collection notice or with Your consent. If We send information overseas We will take measures in accordance with the Australian Privacy Principles to protect Your Personal Information. As Our overseas providers might change, You should contact Us at Our contact details stated above in order to acquire the names or details about these overseas participants and/or countries, should this apply to You.

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 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 'needs 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 to retain it for longer;
- 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;
- 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 PO Box 199, Chatswood NSW 2057 or call Our privacy officer at 13 13 43. 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 about Privacy**

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 PO Box 199, Chatswood NSW 2057 or call Our privacy officer at 13 13 43. 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.

You can obtain information on privacy issues in Australia by visiting the Office of the Australian Information Commissioner's web site located at [www.oaic.gov.au](http://www.oaic.gov.au) or by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by calling at 1300 363 992

Dated: 12 March 2014