

# HONAN INSURANCE GROUP PRIVACY POLICY

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Honan Insurance Group Pty Ltd (ABN 67 005 372 396 AFS Licence number 246749) and its associated entities (**we, us, our**), understand the importance of protecting your privacy and the confidentiality of the personal information you provide.

This is our Privacy Policy and it explains how we will collect, hold, use, store and disclose your personal information in accordance with the Privacy Act 1988 (Cth) (**Privacy Act**) and the Australian Privacy Principles. We recommend that you read it carefully.

## Personal Information?

When used in this Privacy Policy the term 'personal information' has the meaning given to it in the Privacy Act. This is information or opinion that can be used to personally identify you or which makes you reasonably identifiable.

## How and why do we collect and hold your personal information?

When you contact us, we collect your contact details such as your name, email and telephone number so that we can provide our services to you.

When we arrange insurance on your behalf, we ask you for the information we need to advise you about your insurance needs and management of your risks. This can include a broad range of information ranging from your name, address, contact details, age, to other information about your personal affairs including your assets, personal belongings, financial situation, health and wellbeing.

When you make a claim under your insurance policy, we assist you by collecting information about your claim.

You may choose to submit information to us via our website, using the self-service forms (e.g. Claim Forms, Employment and Contact request). You may also choose to download these forms as a PDF and fax these forms to us.

When you use our website, we may use analytics and cookies to collect information from you about the use of our website (mostly anonymous data). See the "Anonymous Data" and "Cookies" section at the end of this Privacy Policy for more detail.

Sometimes we also need to collect information about you from others.

## How and why do we use and disclose your personal information?

We use your information to choose appropriate insurers and intermediaries to ask to quote for your insurance. We then 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, or to fund your premium and on what terms.

Insurers may in turn pass on this information to their reinsurers. Some of these companies are located outside Australia. For example, if we seek insurance terms from an overseas insurer (e.g. Lloyd's of London), your personal information may be disclosed to outside of Australia. If this is likely to happen, we will inform you of where the insurer is located, if it is possible to do so. We also provide information we collect about any claims you make to your insurer (or anyone your insurer has appointed to assist it to consider your claim, e.g. loss adjusters, medical brokers, solicitors etc) to enable it to consider your claim. Again this information may be passed on to reinsurers.

From time to time, we will use your contact details to send you direct marketing communications including information about new services, offers, events, updates, articles and newsletters that are relevant to the services we provide or we otherwise think will be of interest to you. We always give you the option of electing not to receive these communications in the future. You can unsubscribe by notifying us and we will no longer send this information to you. We may also send updates to you via post. If you would rather not receive updates via post, you can, at any time, email or write to us and ask us to stop.

In providing our services to you, we will also use your information to contact and communicate with you about our services (including renewals); for our internal record keeping, administrative, invoicing and billing purposes; for client surveys; for analytics, market research and business development, including internally to operate, fix problems with and improve our services and associated applications; and to comply with our legal obligations and resolve any disputes that we may have.

In storing your data and providing our services to you, we also use third party service providers and we may disclose your information to these third party services providers as required for us to receive their services. Such third-party service providers may store your data within and outside Australia. For example, a contractor handling mail on our behalf; external data storage providers; IT software and service providers for our systems; maintenance or problem solving providers; marketing or advertising providers; legal advisors; and debt collectors in the event you fail to pay for services we have provided to you. However, we will take reasonable measures to ensure that they handle your information as required under the Privacy Act.

We may also disclose your information to our employees, contractors and/or related entities; our existing or potential agents or business partners; anyone to whom our business or assets (or any part of them) are, or may (in good faith) be, transferred; credit reporting agencies, courts, tribunals and regulatory authorities, in the event you fail to pay for services we have provided to you; and courts, tribunals, regulatory authorities and law enforcement officers, as required by law, in connection with any actual or prospective legal proceedings, or in order to establish, exercise or defend our legal rights.

We may also provide your information to others if we are authorised or required to do so by law.

## How do we handle your sensitive information?

The type of sensitive information we may collect about you includes, information about your health and your membership with a trade union or other professional association for the purpose of assisting you with your insurance.

Unless otherwise permitted by law, we will not collect sensitive information about you without first obtaining your consent.

We will only use and disclose your sensitive information for any purposes you consent to; the primary purpose for which it is collected, including for insurers and intermediaries to quote for insurance and as relevant to any insurance claim; secondary purposes that are directly related to the primary purpose for which it was collected, including disclosure to the above listed third parties as reasonably necessary to provide our services to you; and if otherwise required or authorised by law, such as if the information is subpoenaed.

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

We can only fully advise you and assist in arranging your insurance, or with a claim, if we have all relevant information. The insurance laws also require you to provide your insurers with the information they need in order to be able to decide whether to insure you and on what terms. You have a duty to disclose the information which is relevant to the insurer's decision to insure you.

## When do we disclose your information overseas?

If you ask us to seek insurance terms and we recommend an overseas insurer, we may be required to disclose the information to the insurer located outside Australia. For example, if we recommend a policy provided by Lloyd's of London, your information may be given to the Lloyd's broker and underwriters at Lloyd's of London to make a decision about whether to insure you.

We will tell you at time of advising on your insurance if they are overseas and in which country the insurer is located. If the insurer is not regulated by laws which protect your information in a way that is similar to the Privacy Act, we will take reasonable steps to ensure the insurer does not breach the Australian Privacy Principles or seek your informed consent before disclosing your information to that insurer.

Australian and overseas insurers acquire reinsurance from reinsurance companies that are located throughout the world, so in some cases your information may be disclosed to them for assessment of risks and in order to provide reinsurance to your insurer. We do not make this disclosure, this is made by the insurer (if necessary) for the placement for their reinsurance program.

Usually we store personal information in Australia, but we may store and access some of your information outside of Australia, currently in Malaysia. Where we do so, we will take such steps as are reasonable in the circumstances to protect your personal information in accordance with the Australian Privacy Principles.

Third party service providers which we use may also at times store or access your information outside of Australia. We will only disclose your personal information to third party service providers in countries with laws which protect your personal information in a way which is

substantially similar to the Australian Privacy Principles or we will take such steps as are reasonable in the circumstances to protect your personal information in accordance with the Australian Privacy Principles.

### **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 may hold the information we collect from you electronically and on paper/in hard copy.

We take reasonable technical and organisational steps to ensure your personal information is secure and protected from unauthorised access, loss, misuse, disclosure or alteration. We also take measures to destroy or permanently de-identify personal information when it is no longer required. The types of measures we take vary with the type of information, and how it is collected and stored.

The information submitted via the online self-service forms is not encrypted – an option is available for claim forms to be downloaded in PDF format for faxing. Should you be concerned about the security or confidentiality of the claim information, this would be the recommended method.

Information collected via online forms is sent to our offices via EMAIL (not encrypted) and is also stored on a database which is accessible by Honan Insurance Group's staff only (password protected). We cannot guarantee the security of any information that is transmitted to or by us over the Internet. The transmission and exchange of information is carried out at your own risk.

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

### **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 you and the information, we will provide access to you the personal information we hold about you. We will also correct, amend or delete any personal information that we agree is inaccurate, irrelevant, out of date, misleading or incomplete.

If you wish to access or correct your personal information, please write to our Privacy Officer at Honan Insurance Group, Level 9, IBM Tower, 60 City Road, Southbank VIC 3006 or [privacyofficer@honan.com.au](mailto:privacyofficer@honan.com.au).

We do not charge for receiving a request for access to personal information or for complying with a correction request. Where the information requested is not a straightforward issue and will involve a considerable amount of time, then a reasonable charge will need to be confirmed for responding to the request for access to the information.

In some limited cases, we may need to refuse access to your information, or refuse a request for correction. We will advise you as soon as possible after your request if this is the case and the reasons for our refusal.

## How to contact us or make a complaint

If you have concerns about whether we have complied with the Privacy Act or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer at Honan Insurance Group, Level 9, IBM Tower, 60 City Road, Southbank VIC 3006 or [privacyofficer@honan.com.au](mailto:privacyofficer@honan.com.au).

Your complaint will be considered by us through our internal complaints resolution process.

## Your consent

By enquiring with us or 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 above.

## Anonymous data

We use technology to collect anonymous information about the use of our website, for example when you browse our website our service provider logs your server address, the date and time of your visit, the pages and links accessed and the type of browser used. It does not identify you personally and we only use this information for statistical purposes and to improve the content and functionality of our website, to better understand our clients and markets and to improve our services.

## Cookies

In order to collect this anonymous data we may use “cookies”. Cookies are small pieces of information which are sent to your browser and stored on your computer’s hard drive. Sometimes they identify users where the website requires information to be retained from one page to the next. This is purely to increase the functionality of the site. Cookies by themselves cannot be used to discover the identity of the user. Cookies do not damage your computer and you can set your browser to notify you when you receive a cookie so that you can decide if you want to accept it. Once you leave the site, the cookie is destroyed and no personal or other information about you is stored.

## Tell us what you think

We welcome your questions and comments about privacy. If you have any concerns or complaints, please contact our Privacy Officer on telephone number +613 9947 4333 or by email at [privacyofficer@honan.com.au](mailto:privacyofficer@honan.com.au)

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