

Privacy Policy

about Underwriting Pty Ltd (ABN 78 608 848 479) is part of the 11th Avenue Group Services Pty Ltd (ABN 85 696 939 278). References in this Privacy Policy to “about Underwriting”, “we”, “us” or “our” may include related bodies corporate within the Group. The term, “related bodies corporate” has the meaning given in the Corporations Act 2001 (Cth).

When you are asked to provide information to us, it will only be used in the ways described in this Privacy Policy.

Our Privacy Statement

about Underwriting is committed to protecting your privacy in accordance with the *Privacy Act 1988* (Cth) (“the *Privacy Act*”), the *Privacy Amendment (notifiable Data Breaches) Act 2017* and the Australian Privacy Principles. This Privacy Policy describes our current policies and practices in relation to the collection, handling, use and disclosure of personal information.

What is personal information?

The *Privacy Act* defines ‘personal information’ as “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 recorded in a material form or not.”

‘Sensitive information’ is a subset of personal information and relates to information or opinion about an individual’s racial or ethnic origin, political opinions, membership of a political organisation, religious beliefs or affiliations, philosophical beliefs, membership of a professional or trade association, membership of a trade union, sexual orientation or practices, criminal record, health information about an individual, genetic information, biometric information or templates.

Why do we collect personal information?

If you are requesting products or services from **about** Underwriting, or you need to make, or are involved in an insurance claim, we may need to collect information from you or from persons associated with you.

How do we collect personal information?

about Underwriting only collects personal information by lawful and fair means and where it is reasonably necessary and/or directly related to the products and services we provide. The ways in which we collect personal information can include from you or a person associated with you in person, in writing, by phone and/or via our website and our online quotation system.

What kind of personal information do we collect and hold?

The kind of personal information **about** Underwriting collects and holds varies depending on the services we are providing.

When we arrange insurance, we may ask for information required to quote on and insure 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.

Sensitive information we may collect generally include criminal records; health information; and membership of a professional or trade association.

If you are requesting products or services from us, we may collect any relevant payment or billing information, (including but not limited to bank account details, direct debit, credit card details,

billing address, and premium funding and instalment information).

When you make a claim under your policy, we will collect information about your claim.

How do we hold and protect your information?

about Underwriting strives 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 on our Insurance Underwriting System and cloud-based servers. In some cases, your file is archived and sent to an external data storage provider for a period of time. We only use storage providers located in Australia who are also regulated by the *Privacy Act*.

We ensure that your information is safe by taking all reasonable steps to protect data from misuse, interference, loss and/or unauthorised access, alteration or disclosure. For example, we maintain physical security over our paper and electronic data and premises, by using locks and security systems. We prevent unauthorised disclosure or access to your information via strong security safeguards including firewalls, endpoint protection, and security systems. Unique user identifiers, passwords and multi-factor authentication are required in order to access all our computer systems.

Only authorised staff will have access to your personal information. Their access is subject to strict controls and procedures. All of our staff are required to participate in continuous data security and cybersecurity awareness training. Furthermore, personal information is de-identified or destroyed securely when no longer required by us.

We follow stringent procedures to ensure we work with all personal data in line with the *Privacy Act*.

Use of and disclosure of personal information

about Underwriting collects, holds and uses personal information to provide and administer our products and services and/or for the administration and management of claims.

about Underwriting may disclose personal information to, contractors, business associates and suppliers and may include claims management companies, loss adjusters, solicitors, surveyors, insurance brokers, insurance underwriters, reinsurers, premium funders and external data storage providers and anyone we appoint to assist in the administering of policies or handling claims. We may also disclose personal information to our related bodies corporate, parent company and affiliated entities for purposes including administration, compliance, governance, risk management, IT support, analytics, product development and customer service.

By providing your personal information to us, you consent to us making these disclosures.

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

From time to time, we, or our contractors may use your contact details to send you direct marketing communications including offers, updates, events and newsletters that are relevant to the services we provide.

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 also use your information to send you requested policy information and promotional material and to

enable us to manage your ongoing requirements, e.g. renewals, invoicing, surveys etc.

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

When do we disclose your information overseas?

If you ask **about** Underwriting 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.

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.

When we send information overseas, we will take all reasonable steps to ensure that overseas providers do not breach the *Privacy Act* and that they afford the same level of protection or obligations that are offered by the *Privacy Act*. This includes ensuring that the countries to which we send information have the same or similar laws protecting personal information.

By proceeding to acquire our services and products you agree that you cannot seek compensation under the *Privacy Act* or against us (to the extent permitted by law) and may not be able to seek compensation overseas. If you do not agree to the transfer of your personal information outside Australia, please contact us.

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

about Underwriting can only fully advise you and assist in arranging your insurance or actioning a claim, if we have all relevant information. If you do not provide all the relevant information, we may not be able to provide the appropriate products or services. We will advise what the impact will be in this event.

Transactions – via online quoting system

Where applicable, if you have accessed **about** Underwriting's online quotation system, or submitted an enquiry via our website we will collect the information to either assess your risk, or to return your enquiry as requested. Email addresses are only collected if you send us a message and will not be automatically added to our mailing list unless requested.

Our website

about Underwriting uses 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 insureds and markets and to improve our services.

Automated Decision Making

We may make use of Artificial Intelligence tools to assist us in the processing of information, including your personal information. However, we do not use Artificial Intelligence to make automated decisions, or to do a thing that is substantially and directly related to making a decision about your rights or interests.

Cookies

In order to collect this anonymous data **about** Underwriting 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.

Will we disclose the information we collect to anyone?

about Underwriting does 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, external data storage providers. We may also disclose or transfer personal information as part of an actual or proposed corporate transaction, including a sale of assets, merger, acquisition, restructure, change in control or transfer of business operations. In these circumstances, we will take reasonable steps to ensure that any recipient protects personal information in accordance with applicable privacy laws.

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.

Links from our website

The **about** Underwriting website may contain links to other websites. Please note that we have no control of websites outside the aboutunderwriting.com.au domain. If you provide information to a website to which we link, we are not responsible for its protection and privacy.

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

Upon receipt of your written request and enough information to allow **about** Underwriting 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, irrelevant, out of date or incomplete.

If you wish to access or correct your personal information please write to our Privacy Officer on the details provided below.

We do not charge for receiving a request for access to personal information or for complying with a correction request. 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. Verification of identity is required with a request to access (or update) personal or sensitive information so that we can ensure your information is disclosed only to you.

We will provide a response to your request for access or correction within 30 days.

The General Data Protection Regulation ('GDPR')

If you are an individual who is either based in or a resident of the European Union or the United Kingdom, and subject to applicable data privacy laws, **about** Underwriting cannot process personal data about you unless we have a lawful reason to carry out the processing, including where you have explicitly consented or in performance of a contract to which you are a party, among other reasons.

The purpose for which **about** Underwriting will collect and process your data will be to provide you with insurance products and services.

If you are an individual who is either based in or a resident of the European Union or the United Kingdom, you have the right to:

- be informed as to how we are collecting and using your personal data including how long we will keep your data;
- obtain confirmation from us as to whether or not your personal data is being processed, where and for what purpose. If requested, we will provide you with a copy of your personal data, free of charge in an easily accessible format;
- rectification by us of inaccurate personal data we hold about you;
- request that we erase your personal data if we no longer have a legitimate interest to continue holding or processing the data (the “Right to be Forgotten”);
- object to the processing of your personal data, including for direct marketing and processing based on a legitimate interest; and
- request that we restrict the processing of your personal data in certain circumstances, including where you believe the data is inaccurate or in the case of unlawful processing.

The GDPR also imposes obligations upon us to ensure processing is performed in accordance with the Regulations, including implementing data protection principals, ensuring records of processing activities are maintained and the conducting of data impact assessments in certain circumstances.

What happens if you want to complain?

If you have concerns about whether **about** Underwriting has complied with the *Privacy Act* or this Privacy Policy when collecting or handling your personal information, please write to our Privacy Officer on the details provided below.

Your complaint will be considered by us through our internal complaints resolution process and we will do our utmost to respond with a decision within 30 days of you making the complaint.

Complaints that cannot be resolved may be escalated to an independent dispute resolution body; Australian Financial Complaints Authority (AFCA). This external dispute resolution body has the ability to make decisions of which About Underwriting are obliged to comply. Contact details are:

Australian Financial Complaints Authority

Mail: GPO Box 3, Melbourne VIC 3001

Phone: 1800 931 678

Email: info@afca.org.au

Internet: www.afca.org.au

Your consent

By asking **about** Underwriting 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.

Contact Details

If you have any questions about this policy, please contact our Privacy Officer:

Privacy Officer, About Underwriting Pty Ltd

Mail: PO Box 16106,
Collins Street West VIC 8007

Phone: (03) 9998 9080 or 9998 9086

Fax: (03) 9998 9099

Email: privacy@aboutunderwriting.com.au

Internet: aboutunderwriting.com.au