



AFSL 236663

Privacy Policy

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1. Introduction.

This Policy sets out how The Proplab Group Pty Ltd t/as St George Underwriting Agency (SGUA) will manage personal information in accordance with the Australian Privacy Principles set out in the Privacy Act 1988 (Cth).

The Privacy Act 1988 (Cth) details Australian Privacy Principles that set minimum standards for how private sector organisations should collect, use, disclose, store, provide access to and correct Personal Information.

The Policy is supported by our procedures, templates and register for managing privacy. The Policy forms part of our compliance arrangements and is incorporated within SGUA's Compliance Manual.

The Policy has been endorsed by the Board who are personally committed to ensuring that it is followed. This policy will be reviewed periodically with the current policy available externally on our website, and internally on our intranet.

2. Types of Personal Information we collect.

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.

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, your spouse/partner or an interested third party. Typically the details we collect and manage include, but are not limited to:

- Name
- Address
- Contact details (e.g. phone, email)
- Date & place of birth
- Gender
- Marital status
- Occupation and past occupations (includes place of occupation)
- Financial status (salary, assets)
- Bank account details
- Credit card details
- Tax file number
- Medicare number
- Centrelink customer reference number

Sensitive Information is a sub set of Personal Information considered particularly private and means:

- a) information or an opinion about an individual's:
 - I. Racial or ethnic origin
 - II. Political opinions
 - III. Membership of a political association
 - IV. Religious beliefs or affiliations
 - V. Philosophical beliefs
 - VI. Membership of a professional or trade association
 - VII. Membership of a trade union
 - VIII. Sexual orientation or practices
 - 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.

3. Our Commitment.

SGUA will only collect, use, disclose, store provide access to and the opportunity to correct Personal Information where the information is reasonably necessary for the activities or functions we undertake and/or as otherwise permitted by the Privacy Act.

These activities and functions usually involve the purchase of an insurance policy and/or the settlement of an insurance claim or activities associated with the issuing of an insurance policy or paying a claim, such as reinsurance, loss investigation and/or assessment. This may require us to collect personal information such as your name, age, gender, contact details, bank details and details of your investment property. If you are applying for a job with us, we may need personal information such as your qualifications and past occupations.

Where we collect Personal Information also considered to be sensitive information, the information will only be collected if you consent to it being collected or as otherwise permitted by the Privacy Act. Our activities and functions may require us to collect sensitive information including details of any criminal record such as in relation to theft or fraud.

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.

In any of these circumstances we will only collect, hold and disclose sensitive information in accordance with the Privacy Act.

4. Why we collect Personal Information.

We collect Personal Information to provide, offer and administer our various products and services, or otherwise as permitted by the Privacy Act. Such purposes may include the necessity of Personal Information to enable us in:

- responding to your enquiries and 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 or managing and assessing claims;
- processing payments, such as to facilitate payment of premiums, payment of claims or employment benefits;
- processing your survey or questionnaire responses;
- enabling 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;
- providing quality assurance and training purposes;
- performing administrative operations including accounting and risk management;
- assessing your suitability for employment or continued employment with us;
- resolving complaints you have made including for the purposes of internal/external dispute resolution;
- complying with our legal obligations; and
- any other purpose identified at the time of collecting your information.

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.

There may be circumstances where we may collect sensitive information without your consent, as permitted under the Privacy Act, which circumstances broadly relate to:

- A legal requirement
- A serious threat to your or another's life, health or safety
- Suspected unlawful activity or serious misconduct
- Locating a missing person
- Exercise or defence of legal or equitable claims e.g. to establish the validity of your insurance claim
- Confidential alternative dispute resolution processes
- Health information under the circumstances set out in the Privacy Act.

Other than when required or permitted by law, as specified in this privacy policy, or where you have provided your consent, we will not disclose your Personal Information for any other purpose.

5. How we collect your Personal Information.

We collect your Personal Information by lawful and fair means pursuant to the Privacy Act. These may include various ways and at several different points, such as telephone conversations or mobile phone text messaging, through our websites, by electronic means such as emails, hard copy forms such as insurance proposal forms or claim forms or through job applications.

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

- Our authorised representatives;
- Our distributors or referrers, agents, business partners and affiliates, other insurers, or related companies;
- Our service providers including investigators or loss assessors;
- Third parties for the purposes of assessing a claim or providing you with insurance cover or other services;
- Another party involved in a claim;
- Family members or anyone 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 (AFCA) 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;
- Publicly available sources of information;
- Data partners, analytic consultants and other similar organisations;
- Any other organisation or person where you have consented for them in 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 you provide us with 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 and/or Sensitive 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 surveys. Participation in any such survey is completely voluntary so you have the choice of whether or not you disclose the Personal Information requested. We may use Personal Information we 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.

6. Cookies and 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.

7. 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.

8. Direct Marketing.

On occasion, we may use your Personal Information to provide you with information about the products and services. 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.

9. Collecting, Sharing and Disclosing your Personal Information.

We may collect Personal Information from and/or share your Personal Information with 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 maybe 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;
- If disclosure is required by 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.

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.

a. Transfer of Personal Information overseas.

Information collected is mostly retained within Australia, however, there may be circumstances where your Personal Information may be disclosed to and stored by business partners, reinsurers and service providers that may be located overseas: including the USA, Canada, Bermuda, Europe (including the United Kingdom), Singapore, Malaysia, Hong Kong and India where there is a proper purpose for doing so. The overseas countries may have a different data protection regime to that of Australia.

10. 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, upon noticing, 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.

11. Access to and correction of your Personal Information.

You may generally access the information we hold about you and request corrections. This right, however, 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 not 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.

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.

12. Currency and Status of our Privacy Policy.

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.

13. How to contact us including for 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 contact us as follows:

SGUA
PO Box 5663
St Georges Terrace, Perth WA 6831

Phone: 1300 697 482
Email: Insurance@sgua.com.au

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 not satisfied with our final review you may take your complaint to the Australian Financial Complaints Authority (AFCA) which is a recognised external dispute resolution scheme.

You can contact AFCA by:

Phone on: 1800 931 678 (free call)
Post at: Australian Financial Complaints Authority, GPO Box 3, Melbourne VIC 3001
Email at: info@afca.org.au.

Lastly, the Office of the Australian Information Commissioner also has the power to investigate complaints and recommend appropriate action to remedy your complaint. You can contact the Commissioner by:

Phone on: 1300 363 992,
Post at: The Privacy Commissioner at, GPO Box 5218, Sydney 2001, or
Email at: enquires@oaic.gov.au.

End of Policy

