

PRIVACY POLICY

Swann Insurance (“We/us/our”)

Your privacy is important to us and we are committed to handling your personal information in a responsible way in accordance with the Privacy Act. This is our Privacy Policy and it sets out how we collect, store, use and disclose your personal information. We recommend that you read it carefully.

You do not have to provide us with your personal information, but if you do not do so we may not be able to provide you with our products or services. By visiting any of our websites, applying for, renewing or using any of our products or services or providing us with your information, you agree to your information being collected, held, used and disclosed as set out in this Privacy Policy.

The information we collect

We collect the information necessary for us to provide you with the products and services you have requested from us, and to manage your claims. We will only collect your sensitive information if you have provided us with consent to do so. Where practicable, we will give you the option of interacting with us anonymously.

The information we collect and hold generally includes your name, address, date of birth, and contact details (such as your phone number, fax number and/or email address).

However, we may also collect and hold other information required to provide services or assistance to you, including your gender, employment, details of your previous insurances, sensitive information (such as health information and criminal records), claims history, your personal assets and those of your spouse or partner.

How we collect your information

We may collect your information in various ways, including via telephone, our website, hard copy forms or email. Whenever you choose to deal with us directly, we will where possible, collect this information directly from you.

However, there may be occasions when we collect your information from someone else. This may include your broker or financial adviser, our authorised representatives, other insurers, employers, our distributors, agents or related entities, medical practitioners and rehabilitation providers, another party involved in a claim, investigators, family members, anyone you have authorised to deal with us on your behalf, and/or our legal advisors.

On all occasions, your information is collected, held, used and disclosed by us in accordance with this Privacy Policy. We may also seek to collect information about someone else from you (for example, if you request a product or service jointly with another person). However, you must not provide us with information about another person unless you have clear consent from that person to do so and let them know about this Privacy Policy and where to find it.

How we use your information

We only use your information for the purpose for which it was provided to us, related purposes and as permitted by law. Such purposes include:

- responding to your enquiries;

- providing you with the assistance you requested of us, our products and services (for example, fulfilling requests for quotes or applications for insurance, underwriting and pricing policies, issuing you with a policy, managing claims, making payments, etc);
- maintaining/administering your account and policies and making payments you have authorised;
- processing your survey or questionnaire responses for the purpose(s) notified in the survey or questionnaire (if you have chosen to participate in such);
- for market research so that we can better understand our customers' needs and tailor our future products and services accordingly;
- providing you with marketing information regarding other products and services (of ours or of a third party) which we believe may be of interest to you, if you have opted-in to receive such information;
- quality assurance and training purposes; and
- any other purposes identified at the time of collecting your information.

However, we will only use your sensitive information for the purposes for which it was initially collected, other directly related purposes or purposes to which you otherwise consent.

If you are not a customer (for example, if you are a medical practitioner, investigator, expert, claimant or other third party), your information will only be used for the specific purpose or claim for which it was provided to us, unless you have consented to other uses.

How we disclose your information

Where appropriate, we will disclose your information to our related entities and third parties who provide services to us or on our behalf, including:

- insurance advisers (such as Swann Insurance authorised representatives and insurance brokers);
- mailing houses;
- insurance reference bureaux, underwriters and re-insurers (and their representatives);
- other insurance providers;
- any credit providers that have security over your property;
- in the case of some claims (or likely claims), assessors, repairers, builders, investigators, your employer, medical practitioners, rehabilitation and other health providers;
- the external dispute resolution scheme we are a signatory to;
- our external IT service providers, infrastructure and other third party service providers;
- government bodies, regulators, law enforcement agencies and any other parties where required by law; and
- our related entities so that they can also offer you products and services if you have opted-in to receive such information.

We will only disclose your sensitive information for the purposes for which it was initially collected, other directly related purposes or purposes to which you otherwise consent.

A small number of our related entities and third party service providers are or will be located in countries outside of Australia (mostly in New Zealand and in the United States). Our contracts with these parties generally include an obligation for them to comply with Australian privacy law and our Privacy Policy. However, you acknowledge that, by agreeing to the disclosure of your information to these entities outside of Australia, we will no longer be required to take reasonable steps to ensure the overseas recipient's compliance with the

Australian privacy law in relation to your information and we will not be liable to you for any breach of the Australian privacy law by these overseas recipients and, on this basis, you consent to such disclosure.

Security of your information

We take reasonable steps (including any measures required by law) to ensure your information is protected and secure. For any insurance payments you make via our websites, we use a recognised payment service provider that is required to take reasonable steps to protect your information.

We also take reasonable precautions to ensure that any information you provide to us through our websites is transferred securely from our servers to our mainframe computers, including through use of Secure Sockets Layer (SSL) protocols.

However, no data protection and security measures are completely secure. Despite all the measures we have put in place, we cannot guarantee the security of your information, particularly in relation to transmissions over the internet.

Accordingly, any information which you transmit to us is transmitted at your own risk. You must take care to ensure you protect your information (for example, by protecting your usernames and passwords, policy details, etc) and you should notify us as soon as possible after you become aware of any security breaches.

Accuracy, access and correction

We take reasonable steps to ensure the information we collect and hold about you is accurate, complete and up-to-date. However, we rely on you to advise us of any changes to your information or corrections required to the information we hold about you.

Please let us know as soon as possible if there are any changes to your information or if you believe the information we hold about you is not accurate, complete or up-to-date.

We will, on request, provide you with access to the information we hold about you unless otherwise required or permitted by law. We will notify you of the basis for any denial to access your information. We may ask you to complete a 'Personal Information Access Request Form' which can be obtained by contacting Swann Insurance (refer to "How to contact us" below) and may charge you a service fee for retrieving and sending the information to you.

What if you have a complaint?

If you wish to make a complaint about a breach of this Privacy Policy or of the Privacy Act 1988 (Cth), you can contact us using the contact details below. You will need to provide us with sufficient details regarding your complaint, as well as any supporting evidence and/or information.

We will investigate the issue and determine the steps we will undertake to resolve your complaint. We will contact you if we require any additional information from you and will notify you in writing of the determination. If you are not satisfied with our determination, you can contact us to discuss your concerns or complain to the Australian Privacy Commissioner via www.oaic.gov.au

Revision of our Privacy Policy

We reserve the right to revise this Privacy Policy or any part of it from time to time. Please review this Policy periodically for changes. If we make significant changes to this Policy, we will notify you by email or by putting a notice on our website www.swanninsurance.com.au/privacy

Your continued use of our websites, products or services, requesting our assistance, applying for or renewal of any of our products or services or the provision of further personal or sensitive information to us after this Privacy Policy has been revised, constitutes your acceptance of the revised Privacy Policy.

How to contact us

If you have any questions or concerns about this Privacy Policy or its implementation, please email us at Swann.Compliance@iag.com.au

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Insurance Australia Limited
ABN 11 000 016 722 AFS Licence No 227681
trading as Swann Insurance (Swann Insurance).