

## PRIVACY POLICY

### 1. PREAMBLE

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- 1.1 This policy outlines View Insurance's obligations under the *Privacy Act* 1988 (Cth) (the **Privacy Act**) and the Australian Privacy Principles (**APPs**) contained in Schedule 1 of the Privacy Act.
- 1.2 This policy also outlines View Insurance's obligations under the *Spam Act* 2003 (Cth) (the **Spam Act**) and the *Do Not Call Register Act* 2006 (Cth) (the **Do Not Call Register Act**).
- 1.3 People who deal with View Insurance are entitled to expect that any information collected will be treated in accordance with View Insurance's privacy obligations. This policy outlines the type of information that View Insurance collects and holds, why and how View Insurance collects, uses, discloses and otherwise handles personal information.
- 1.4 This policy outlines how stakeholders can access and correct any personal information that View Insurance holds about them, or to complain about a suspected privacy breach.
- 1.5 This policy does not generally apply to the collection, use and handling of current or former employees, which is generally exempt from the requirements of the Privacy Act. However, this policy will apply to View Insurance's collection, use and handling of personal information about job applicants and contractors.
- 1.6 View Insurance reserves the right to amend this policy from time to time, either in part or in full without notice. The amended policy will be effective immediately upon publishing on the View Insurance website. View Insurance recommends that you read this policy each time you visit its website.

### 2. PERSONAL INFORMATION

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- 2.1 Personal information is information or an opinion about an individual whose identity is apparent, or can be reasonably ascertained, from that information or opinion.
- 2.2 View Insurance collects personal information through a variety of lawful means, including:
  - (a) information that you provide us when you apply for insurance, make a claim, or interact with our website or customer service;
  - (b) information that we collect automatically when you visit our website, such as your IP address, browser type, device information;
  - (c) information that you provide us when you apply for employment; and
  - (d) information obtained from third parties, such as credit reporting agencies, publicly available sources, or View Insurance's affiliates Auto & General Services Pty Ltd (ACN 003 617 909), Auto & General Holdings Pty Ltd (ACN 086 321 459) and Auto & General Insurance Pty Ltd (ACN 111 586 353).
- 2.3 The type of personal information that View Insurance may collect about you includes:
  - (a) contact information, including name, address, email address, telephone number;
  - (b) identification information, including date of birth, gender and sex, driver's license number, and passport details;
  - (c) occupation, driving history, employment history, family obligations and commitments;
  - (d) financial information, including financial needs and requirements, credit card details and bank account details, assets and liabilities, income and expenses; and

- (e) insurance information, including vehicle and property details, policy details with other insurance providers and claims history.
- 2.4 When you visit the View Insurance website, a record is logged of the visit and the following anonymous information is retained for View Insurance's statistical purposes:
- (a) the Internet Protocol (IP) address from which the request is received;
  - (b) the date and time that the request is received by the View Insurance server;
  - (c) the pages, documents and files requested;
  - (d) the address of the resource which provided the link followed, if any, to the View Insurance website;
  - (e) the type of browser and, in some case, the operating system used; and
  - (f) data sent to View Insurance's website from web forms, such as search terms.
- 2.5 The information in subparagraph 2.4 is used and disclosed by View Insurance in anonymous, aggregated form only, for purposes including statistical analysis and to improve the functionality and usability of View Insurance's websites.
- 2.6 View Insurance reserves its right to use or disclose the information to try and locate an individual where it reasonably believes that the individual may have engaged in any unlawful or inappropriate activity in connection with the View Insurance website, or where View Insurance is otherwise required or authorised to do so by law.
- 2.7 Some sections of the View Insurance website use standard industry technologies, for example, 'cookies', which are a small string of information that a website transfers to a user's browser for identification purposes. Any information collected from the View Insurance website is session information that is collated for analysis, evaluated and published in reports that show View Insurance usage patterns. Popular areas of the website are identified in order to improve and develop the website and its services. View Insurance also uses software programs to monitor network traffic and to identify unauthorised attempts to upload or change information, or otherwise cause damage.
- 2.8 Most internet browsers are set to accept cookies. If you prefer not to receive cookies, your internet browser can be adjusted to reject cookies, or to notify you when they are being used. There are also software products available that can manage cookies. Rejecting cookies can, however, limit the functionality of the View Insurance website.

#### *Unsolicited Personal Information*

- 2.9 If View Insurance receives personal information about a person which it has taken no active steps to collect, View Insurance, within a reasonable time after receiving the information, determine whether or not View Insurance could have collected the information under the APPs if View Insurance had solicited the information.
- 2.10 View Insurance may keep that information if the Privacy Act and the APPs permit it to do so. If the Privacy Act and the APPs do not permit View Insurance to retain that information, it will be destroyed or de-identified, provided it is lawful and reasonable to do so.

### **3. COLLECTION AND USE OF PERSONAL INFORMATION**

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- 3.1 The primary purpose for which View Insurance collects personal information about you is to enable it to perform its insurance broking services.
- 3.2 Personal information may be collected by View Insurance for purposes related, or a reasonably related secondary purpose of collection, including:
- (a) providing insurance quotes, underwriting policies, and managing insurance applications;

- (b) administering insurance policies, including premium calculations, policy renewals, and claims processing;
- (c) communicating with you about your policy, including policy updates, renewal notices, and claim status updates;
- (d) conducting market research and analysis to improve its products and services;
- (e) managing, customising, personalising or enhancing its products and services;
- (f) conducting surveys;
- (g) conducting research for service improvement purposes and to compile statistics and analyse trends;
- (h) recruiting and managing employees and contractors;
- (i) verifying your identity;
- (j) marketing its services and those of its related entities;
- (k) referring you to its affiliates or related entities for any of these purposes;
- (l) administering and managing its services, including billing, maintaining information technology systems, customer service, quality assurance and data storage; and
- (m) complying with legal and regulatory obligations, including those under the Privacy Act and the APPs, the Spam Act and the Do Not Call Register Act.

#### *Sensitive Information*

- 3.3 Sensitive information is a subset of personal information that is generally afforded a higher level of privacy protection, such as information or opinion about a person's health, biometric and genetic information, information about racial or ethnic origins, or criminal history.
- 3.4 In undertaking its insurance broking services, View Insurance may collect sensitive information about you, such as lifestyle information, occupational information, criminal history or information relating to financial hardship:
  - (a) you have consented; or
  - (b) View Insurance is required or authorised to do so under law.

## **4. DISCLOSURE OF PERSONAL INFORMATION**

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- 4.1 View Insurance will only use and disclose personal information about a person for the purposes provided in this policy, where consent is given to View Insurance to do so, or as otherwise required or authorised by law.
- 4.2 View Insurance may disclose personal information about you to third parties for the purposes set out in section 3 of this policy and in the following circumstances:
  - (a) to its service providers, agents, or contractors who assist us in providing insurance products and services;
  - (b) to other insurance companies or reinsurers in connection with insurance-related matters; or
  - (c) with your consent or as otherwise permitted or required by law, including the Privacy Act, the APPs, the Spam Act and the Do Not Call Register Act.
- 4.3 View Insurance may also disclose personal information about you to third parties not contemplated in this policy if:

- (a) View Insurance has reason to suspect that unlawful activity or misconduct of a serious nature relating to View Insurance's functions or activities has been, is being or may be engaged in, and View Insurance reasonably believes that the disclosure is necessary in order for appropriate action to be taken; or
- (b) the disclosure is required by law, regulation, a court or tribunal.

#### *Direct Marketing*

- 4.4 Where express or implied consent has been given to View Insurance, or where View Insurance is otherwise permitted by law, View Insurance may use personal information to send you information about its services. View Insurance may send this information in a variety of ways, including by mail, email, SMS and telephone.
- 4.5 Where paragraph 4.4 applies, you can opt out of receiving these communications at any time, in the following ways:
  - (a) unsubscribe links; or
  - (b) SMS reply 'STOP'.
- 4.6 View Insurance will not disclose or externally publish personal information to third parties who are not related to View Insurance to allow them to direct market their products or services without your person's consent.
- 4.7 View Insurance will only use or disclose sensitive information about you for the purpose of direct marketing if you have consented to the use or disclosure of the information for that purpose.
- 4.8 View Insurance will always comply with the requirements of the Privacy Act and the APPs that apply to cross border disclosures of personal information. View Insurance may also use a cloud-based service located internationally to store and process personal information.

### **5. COLLECTION AND USE OF GOVERNMENT RELATED IDENTIFIERS**

- 5.1 View Insurance will not adopt any government related identifier (such as tax file number, or Medicare number) as its own identifier for a person, unless this is permitted by the Privacy Act or the APPs.
- 5.2 View Insurance will not otherwise use or disclose a government related identifier unless this is permitted by the Privacy Act or the APPs.

### **6. DEALING ANONYMOUSLY OR USING A PSEUDONYM**

- 6.1 You are entitled to interact and liaise with us anonymously or pseudonymously.
- 6.2 Despite paragraph 6.1, it may be impracticable for View Insurance to deal with and provide its services to any individuals who have not identified themselves.
- 6.3 Paragraph 6.1 will not apply if View Insurance is required or authorised by or under an Australian law, a court or tribunal order to deal with individuals who have identified themselves.

### **7. QUALITY, STORAGE AND SECURITY OF PERSONAL INFORMATION**

- 7.1 View Insurance will take reasonable steps to ensure that any personal information it collects, uses and discloses is accurate, up to date, complete and in the case of use or disclosure, relevant.
- 7.2 View Insurance will take reasonable steps to protect personal information against loss,

interference, and misuse, and from unauthorised access, modification or disclosure of all personal information under its control, as required by law. All personal information that is stored on personal information server is password protected.

- 7.3 View Insurance will take all reasonable steps to destroy personal information that is obsolete or no longer required by View Insurance will take. Destruction of personal information is undertaken by secured means.

## **8. ACCESS TO AND CORRECTION OF PERSONAL INFORMATION**

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- 8.1 You may request access to your personal information held by View Insurance and to request its correction by contacting View Insurance using the contact details set out in section 10 of this policy.
- 8.2 View Insurance will generally provide access to your personal information, subject to some exceptions permitted by law. View Insurance will generally provide access in the manner requested, provided it is reasonable and practical for it to do so. View Insurance may charge a fee to cover reasonable costs of locating and providing the information.
- 8.3 If View Insurance decides not to provide you with access to your personal information, View Insurance will provide you with a written notice explaining why it has decided not to give you access and how you may make a complaint about View Insurance's refusal to do so.
- 8.4 You may also contact View Insurance using the contact details set out in section 10 of this policy to seek correction of any personal information held by View Insurance. If you ask View Insurance to correct personal information held about you, or if View Insurance determines that personal information held about you is inaccurate, out of date or incomplete, View Insurance will take reasonable steps to correct the information.
- 8.5 Where subsection 8.4 applies, if View Insurance corrects personal information about you which it has previously provided to another organisation that is subject to the Privacy Act, you may ask View Insurance to notify that other organisation and View Insurance will take reasonable steps to do so.
- 8.6 If you ask View Insurance to correct personal information that it holds about you and View Insurance decides not to do so, View Insurance will provide you with a written notice explaining why it has decided not to correct the information and how you may make a complaint about View Insurance's refusal to do so.
- 8.7 You may ask View Insurance to attach a statement to the record of personal information stating that the information is out of date, incomplete, inaccurate or misleading. View Insurance will generally do so, subject to its legal requirements.
- 8.8 View Insurance not charge you for making a request to correct your personal information.
- 8.9 View Insurance will endeavour to respond to access and correction requests within a reasonable time.

## **9. PUBLISHING PERSONAL INFORMATION ON THE VIEW INSURANCE WEBSITE**

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- 9.1 View Insurance will only publish personal information on its website if that information has been collected for this purpose, and only with your knowledge and consent.
- 9.2 When giving such consent, you should be aware that information published on View Insurance's website is accessible to millions of users from all over the world, that it will be indexed by search engines and that it may be copied and used by any web user. This means that once the information is published on its website, View Insurance will have no control over its subsequent use and disclosure.

- 9.3 Names and email addresses of View Insurance staff appearing on the website are provided with their knowledge and consent.
- 9.4 Where there are links to other sites on the View Insurance website, View Insurance is not responsible for the privacy practices of those businesses or organisations or for the content of those websites.

## **10. COMPLAINTS AND CONTACT INFORMATION**

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- 10.1 If you require further information regarding this policy or if you wish to make a complaint about a breach of the APPs by View Insurance, please contact us by email at:

[privacy@viewinsurance.com.au](mailto:privacy@viewinsurance.com.au)

For mail enquiries or complaints, please send mail to:

Privacy Officer, View Insurance, 65 Gwynne Street, Cremorne VIC 3121.

A senior member of staff will review your complaint within 5 business days and respond to you in writing advising what action(s) we will take as a result of your complaint.

## **11. FURTHER INFORMATION**

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- 11.1 For enquiries or further information about this policy or about how View Insurance handles personal information, please contact View Insurance using the contact details in section 10 of this policy.