



# Privacy Policy

## PRIVACY POLICY

### FRIENDSURANCE (AUSTRALIA) PTY LTD (‘FRIENDSURANCE’)

(ABN 63 165 995 497 AFSL 495657)

PO Box 247, Prahran VIC 3181

PHONE: 1300 21 43 21

EMAIL: [privacy@friendsurance.com.au](mailto:privacy@friendsurance.com.au)

In this Privacy Policy “we”, “our” and “us” means Friendsurance, NWC Insurance Pty Ltd (ABN 93 166 630 511) (**NoWorries Insurance**) and certain Underwriters at Lloyd’s (the Insurers).

At Friendsurance your privacy is important to us. We are covered by the Privacy Act 1998 (Cth) (**Privacy Act**) and its Australian Privacy Principles (**APPs**), which set out standards for the collection, use, disclosure and handling of personal information. This Privacy Policy applies from July 2017 and details how we collect, handle, use or disclose your personal information.

### WHAT IS PERSONAL INFORMATION?

Personal information is essentially 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 is essentially information or an opinion about a person’s racial or ethnic origin, political opinions, membership of a political, trade or professional association or a trade union, religious or philosophical beliefs or affiliations, sexual orientation or practices, criminal record or health, genetic or biometric information or templates.

See the Privacy Act for full details of what is and is not included.

### HOW DO WE COLLECT AND HOLD PERSONAL INFORMATION?

#### Collection of personal information

We only collect an individual’s personal information by lawful and fair means and where it is reasonably necessary for, or directly related to, one or more of our functions or activities.

Unless it is unreasonable or impracticable for us to do so or the law permits us to, or as provided otherwise under this Privacy Policy, we will collect your information directly from you, your employer or your agents.

If we collect details about you from someone else, we will, take reasonable steps to make you aware of the collection in accordance with the APPs.

Collection can take place through websites (from data you input directly or through cookies and other web analytic tools), email, by telephone or in writing.

We may obtain personal information indirectly and who it is from can depend on the circumstances. We will usually obtain it from another insured if they arrange a policy which also covers you, related bodies corporate, referrals, insurers (including previous), insurance intermediaries, witnesses in relation to claims, your agents, health care workers, publicly available sources, premium funders and persons who we enter into business alliances with.

We attempt to limit the collection and use of sensitive information from you unless we require it to provide our services to you. However, we do not collect sensitive information without your consent.

We hold personal information within our own data storage devices or with a third party provider of data storage. Further details about the security of your personal information are provided below.

### Our website

You can visit our websites without providing any personal information. We will only collect personal information through our websites with your prior knowledge for example where you submit an enquiry or application online.

Email addresses are only collected if you enter them and will not be automatically added to a mailing list without your consent.

Sometimes we use third party platforms to deliver information. These are sites hosted and managed by organisations other than ourselves. In certain instances we may provide links to other internet sites, not operated by us, in order to engage with the public to share content or provide access to additional useful information and services. Where that occurs it is important for an individual to be aware that every third party site or tool will have separate privacy and data collection practices, independent of us. Before deciding to contribute to any third party site, an individual should consult the privacy policies relevant to the host of that site or tool to understand how the third-party site or tool will treat information relating to them.

### WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT AND HOLD?

The personal information we collect and hold varies depending on the products and/or services we are providing, but generally could include:

- contact information such as your name, address details, and contact numbers;
- details relating to your employment and employment history;
- your date of birth and gender;
- your financial situation;
- your prior insurance history;
- information relevant to our products or services;
- other information such as your opinions, statements and endorsements collected from you or through surveys and questionnaires; and
- any relevant payment or billing information, such as bank account details, direct debit and credit card details or premium funding and insurance payment arrangements.

The type of sensitive information we may collect can include details of your:

- criminal record;
- health information; and
- membership of a professional or trade association.

Where we receive unsolicited personal information we will determine, within a reasonable period, whether the information was acquired in accordance with the standards of this Privacy Policy. If we determine that the personal information was not collected in accordance with this Privacy Policy, (and the information is not contained in a Commonwealth record) we will destroy or de-identify the information as soon as it is practicable, but only if it is lawful and reasonable to do so.

### Cookies

A cookie is a small string of information that a website transfers to your browser for identification purposes. The cookies we use may identify individual users.

Cookies can either be “persistent” or “session” based. Persistent cookies are stored on your computer, contain an expiration date, and are mainly for the user’s convenience.

Session cookies are short-lived and are held on your browser’s memory only for the duration of your session; they are used only during a browsing session, and expire when you quit your browser.

We may use both session and persistent cookies. This information may be used to personalise your current visit to our websites or assist with analytical information on site visits.

Most internet browsers can be set to accept or reject cookies. If you do not want to accept cookies, you can adjust your internet browser to reject cookies or to notify you when they are being used. However, rejecting cookies may limit the functionality of our website.

## WHAT ARE THE PURPOSES WE COLLECT, HOLD, USE AND DISCLOSE PERSONAL INFORMATION FOR?

We collect, hold, use and disclose your personal information where it is reasonably necessary for, or directly related to, one or more of our functions or activities, to offer and administer our various products and services or otherwise as permitted by law.

Such purposes include identifying you, responding to enquiries, providing assistance, maintaining and administering our products and services (for example processing requests for quotes, applications for insurance, underwriting and pricing policies, arranging or issuing a policy, managing claims, processing payments), processing survey or questionnaire responses, market research and the collection of general statistical information using common internet technologies such as cookies; arranging for alternative insurance providers; providing you with marketing information regarding other products and services (of ours or a third party), quality assurance and training purposes; performing administrative operations (including accounting and risk management), improving the services and products that we provide to you (for example, training and development of our customer services team), data analysis, business strategy development and any other purpose identified at the time of collecting your information.

We also use it to help to develop and identify products and services that may interest you, conduct market, product, service or consumer satisfaction research, develop, establish and administer alliances and other arrangements with other organisations in relation to the promotion, administration and use of our respective products and services. See direct marketing explained in more detail further below. For more information on our services please contact us.

We only use and disclose personal information about an individual for the primary purposes for which it was given to us, or where:

- the individual has consented to the use or disclosure of the information;
- the individual would reasonably expect us to use or disclose the information for a secondary purpose and the secondary purpose is:
  - if the information is sensitive information — directly related to the primary purpose; or
  - if the information is not sensitive information — related to the primary purpose; or
- the use or disclosure is otherwise required or authorised by law, including by the APPs.

We do not use sensitive information to send you direct marketing communications without your express consent.

### Direct marketing

We may use your personal information, including any email address you give to us, to provide you with information and to tell you about our products, services or events or any other direct marketing initiatives (including third party products, services and

events) which we consider may be of interest to you. In addition, if it is within your reasonable expectations that we send you direct marketing communications given the dealings you have had with us, then we may also use your personal information to send you direct marketing communications that we may consider to be of interest to you. Our related entities may also contact you about services and products that may be of interest to you. You can opt out of direct marketing at any time by logging onto your “MyPlace” account.

### Third parties

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

We usually disclose personal information to third parties who assist us or are involved in the provision of services and products we market and arrange, including direct marketing. Your personal information is disclosed to them only in connection with these services and products or with your consent.

These third parties include: our related companies and our representatives who provide services for us, our agents or contractors, our insurers, other insurers and reinsurers, your agents, premium funders, other insurance intermediaries, underwriting agents, Lloyd’s Regulatory Division, our legal, accounting and other professional advisers, actuaries, data warehouses and consultants, social media and other similar sites and networks, membership, loyalty and rewards programs or partners, providers of medical and non-medical assistance and services, translators, investigators, loss assessors and adjusters, credit agencies, credit card providers and other parties we may be able to claim or recover against, your employer (if a corporate policy), anyone either of us appoint to review and handle complaints or disputes, other companies in the event of a corporate sale, merger, re-organisation, dissolution or similar event and our alliance and other business partners and any other parties where permitted or required by law.

If you purchase a product via our website we also provide your:

- full name;
- Facebook profile picture; and
- Accepted claims

on the online portal ‘My Place’ to other persons that you are connected with and other persons using our services (e.g. new connections).

We provide this information to your connections for the limited purpose(s) of specify e.g to manage your connection choices.

These parties are prohibited from using your personal information except for the specific purpose for which we supply it to them and we take such steps as are reasonable to ensure that they are aware of the provisions of this Privacy Policy in relation to your personal information.

If we do propose to disclose or use your personal information other than for the purposes listed above, we will first seek your consent prior to such disclosure or use.

## WHAT IF YOU DON’T PROVIDE YOUR PERSONAL INFORMATION TO US?

If you don’t provide us with some or all of the information that we ask for, we may not be able to provide you with our services or products or properly manage and administer services and products provided to you or others.

## ANONYMITY AND PSEUDONYMITY

You have the option of not identifying yourself or using a pseudonym provided we are not required or authorised by or under an Australian law, or a court/tribunal order to deal with individuals who have identified themselves or it not impracticable for us to deal with you on this basis.



It will generally be impracticable for you to deal with us anonymously or using a pseudonym if you wish to use our services or have us arrange a product for you.

## WHAT DO WE EXPECT OF YOU AND THIRD PARTIES WE DEAL WITH?

When you provide us with personal information about other individuals, we rely on you to have obtained their consent and made them aware that you will or may provide their information to us, the purposes we use it for, the types of third parties we disclose it to and how they can access it (as described in this document). If it is sensitive information we rely on you to have obtained their consent to the above. If you have not done either of these things, you must tell us before you provide the relevant information.

If we give you personal information, you and your representatives must only use it for the purposes we agreed to.

Where relevant, you must meet the requirements of the APPs set out in the Privacy Act when collecting, using, disclosing and handling personal information on our behalf.

You must also ensure that your agents, employees and contractors meet the above requirements.

## HOW DO WE HANDLE THE SECURITY OF YOUR INFORMATION?

We do our best to protect any personal information that we hold from misuse and loss, unauthorised access, modification and disclosure.

We maintain computer and network security, for example with firewalls (security measures for the internet) and other security systems such as user identifiers and encrypted password protections which control access to our systems where personal information is stored. We also maintain physical security over our paper and electronic data stores and premises by using locks and physical security systems.

We will take such steps as are reasonable in the circumstances to destroy or de-identify personal information, in a secure manner, when it is no longer needed or required to be retained by law or Court/tribunal order.

## HOW DO WE MANAGE THE TRANSFER OF INFORMATION OVERSEAS?

Your personal information may be disclosed to some of our service providers who are located overseas, including but not limited to the United Kingdom and Germany. Who they are may change from time to time. When we send information overseas, in some cases we may not be able to take reasonable steps to ensure they do not breach the Privacy Act and they may not be subject to the same level of protection or obligations that are offered by the Privacy Act. By proceeding to acquire our services and products you agree that you cannot obtain redress under the Privacy Act or against us, but only to the extent permitted by law and may not be able to seek redress overseas.

## HOW DO WE MANAGE THE ACCURACY, ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION?

We will take reasonable steps to ensure that the personal information you provide is accurate, complete and up to date, whenever it is used, collected or disclosed.

When we deal with you we will take reasonable steps to confirm the details of the personal information we hold about you and ask you if there are any changes required.

The accuracy of personal information depends largely on the information you provide to us, so we rely on you to:

- promptly inform us of changes to your personal information (such as your name or address); and
- let us know if you become aware of any errors in your personal information that we hold.

You are entitled to access your personal information if you wish and request correction if required except in some exceptional circumstances provided by in law. 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;
- information would reveal our intentions in relation to negotiations in such a way as to prejudice those negotiations.

Where providing access would reveal evaluative information generated by us in connection with a commercially sensitive decision-making process, we will provide an explanation for the decision rather than direct access to the information.

If we refuse access or to give access in the manner requested by you we will let you know why in writing and provide you with details about how to make a complaint about the refusal.

If we make a correction to your personal information we may retain a copy of the previous information for our records or as required by law.

If you wish to access your personal information please contact our Privacy Officer on the contact details set out at the bottom of this page.

In most cases we do not charge for receiving a request for access to personal information or for complying with a correction request.

## WHAT IF YOU WANT TO COMPLAIN ABOUT THE HANDLING OF YOUR PERSONAL INFORMATION?

If you believe:

- your privacy may have been prejudiced;
- we or our representatives have breached the Australian Privacy Principles or an APP code,

then you have the right to make a complaint about the matter.

In the first instance, your complaint should be addressed in writing to us (see How to contact us and opt out rights? section for contact details). We will investigate the matters raised by you and respond directly to you.

If you are dissatisfied with our response, or you have not received a response from us of any kind to your complaint within 30 days, you should refer the matter to the Office of the Australian Information Commissioner (OAIC) in accordance with the Privacy Act. OAIC can be contacted on 1300 363 992 or see [www.oaic.gov.au](http://www.oaic.gov.au).

You also have a right in limited circumstances to have your privacy complaint determined by the Financial Ombudsman Service (FOS). FOS can determine a complaint about privacy where the complaint forms part of a wider dispute within the FOS Terms of Reference between you and us or when the privacy complaint relates to or arises from the collection of a debt. We are bound by FOS' determinations, provided the dispute falls within the FOS Terms of Reference. Unless exceptional circumstances apply, you have two years from the date of our letter of decision to make an application

to the FOS for a determination. You can access the FOS dispute resolution service by contacting them at:

Postal address: Financial Ombudsman Service Limited,

GPO Box 3

Melbourne Victoria 3001.

Telephone: 1800 367 287

Website: [www.fos.org.au](http://www.fos.org.au)

Email: [info@fos.org.au](mailto:info@fos.org.au)

## UPDATING THIS PRIVACY POLICY

This Privacy Policy is current from July 2017. In the event that this Privacy Policy or any part thereof is amended or modified in the future, the revised version will be available at our office or on our website.

## HOW DO YOU CONTACT US AND WHAT ARE YOUR OPT OUT RIGHTS?

In dealing with us, you agree to us using and disclosing your personal information as set out in this Privacy Policy. This consent remains valid unless you tell us otherwise.

If you wish to gain access to your personal information, want us to correct or update it, have a complaint about a breach of your privacy, wish to withdraw your consent to any of the uses of your information including receiving offers of products or services from us or persons we have an association with, or have any other query relating to our Privacy Policy, please contact us by phone, email or in writing using the contact details set out in this document.

You can also obtain information on privacy issues in Australia on the OAIC website at [www.oaic.gov.au](http://www.oaic.gov.au) or by contacting the OAIC by email at [enquiries@oaic.gov.au](mailto:enquiries@oaic.gov.au) or by phone on 1300 363 992.



# friendsurance

friends with benefits

Phone 1300 21 43 21  
[friendsurance.com.au](http://friendsurance.com.au)  
Email [privacy@friendsurance.com.au](mailto:privacy@friendsurance.com.au)

ABN 63165995497  
AFSL : 495657

20170724 – Privacy Policy v1.0