

## Pet Insurance Privacy Policy

### 1. Protecting your privacy

The privacy of your personal information is very important to Auto & General Insurance Company Limited ACN 111 586 353 in its own capacity and as represented by Pet Health Insurance Services Pty Ltd ACN 638 910 675 ("PHIS" ("we" | "us" | "our").

This Privacy Policy contains important information about the type of personal information we collect, the purposes for which it is used, how it is managed, to whom we disclose it and what measures we take to comply with privacy laws in respect of our websites and our contact centre.

This Privacy Policy is governed by the Privacy Act 1988 (Cth) ("Privacy Act") and the Australian Privacy Principles contained therein. We are bound by the Privacy Act and are committed to complying with the Australian Privacy Principles. The privacy of your personal information is very important to us.

We may make changes to this Privacy Policy from time to time for any reason. We will take reasonable steps to notify you of such changes (whether by direct communication or by posting an updated Policy online, available at [www.autogeneral.com.au/search/PET/EXIG](http://www.autogeneral.com.au/search/PET/EXIG)

As a customer of ING Bank (Australia) Limited ABN 24 000 893 292 trading as ING ("ING"), the personal information collected by us will be disclosed to and used by ING in accordance with the ING Privacy Policy. This can be found at [ing.com.au/privacy.html](http://ing.com.au/privacy.html)

It is important that you read and understand the Privacy Policies.

### 2. What personal information we collect

We collect, hold, use and disclose personal information that is relevant to providing insurance products and services to you.

#### Personal information

The personal information we collect and store about you may include:

- your name;
- contact details (including mobile phone, telephone and email);
- your professional details (if you interact with us in a professional capacity, such as a veterinarian)

and such other information which is relevant and necessary to providing products and services under our pet insurance policies, dealing with pet service providers in relation to an insurance policy or to comply with the law.

We may also collect personal information about other people noted on your insurance policies from you. Where you provide us with personal information about other people you must have their consent to do this, and to provide it on their behalf. If you do not have their consent, you must tell us.

#### Sensitive Information

"Sensitive Information" is a subcategory of personal information which may include information or opinion about an individual. We may receive sensitive information from a veterinary service provider during the claim process. If we are in receipt of sensitive information, it will be protected in accordance with the Australian Privacy Principles.

### 3. Why we collect personal information

We will inform you of the main reasons for collecting your personal information at the time we request it. The purposes for which we will generally collect and use your information include considering any application you make to us (including to process your application in compliance with ours and ING's regulatory requirements, to make a customer eligibility assessment for a product, and to conduct checks to help us comply with ours and ING's regulatory obligations and manage ours and ING's regulatory risks), providing products and services to you, performing administrative functions, enhancing our products and services and

telling you about our other products and services which may include those of our business partners, which we believe may interest you. You may tell us at any time that you do not want us to advise you about other products and services (see Marketing below for more details).

#### **4. How we collect personal information**

We collect information from you in various ways. It might be through our contact centres, over the internet if you transact with us online, or when you fill out an application form for one of our products or services online or via social media.

##### **Information collected online**

We collect information about visitors using our online resources. Any information collected is used to provide our products and services and to identify online behavioural patterns.

Our online resources include, but are not limited to websites and mobile applications "apps". Information collected by these resources may include the following information:

- Server address/IP address
- Date and time of visit to our site
- Pages visited
- Documents downloaded
- The site you visited prior to visiting our website
- The browser you are using to access our resources
- If you have visited our website before
- Tracking user preferences

In addition to the above, mobile apps may collect location data; however, you will be notified if this is the case.

From time to time, we may use data collection devices such as 'cookies' in conjunction with our website. Cookies are commonly used on the internet. They are a small file placed onto a computer by a server. A cookie can later be identified by a server. We may use both 'persistent' and 'session cookies'. We may (whether directly or through our marketing company) evaluate the cookie information collected to measure the effectiveness of advertising in relation to the products and services that we offer and how visitors use our site.

The information we collect through cookies may be combined with previous cookie collected information and other personal information you have provided us, allowing us to identify users at an individual level, their behaviours, activity and needs. Where our marketing company manages the information coming from our site on our behalf, we control how that data may and may not be used.

We may use cookies for various purposes such as:

- to provide you with better and more customised service and a more effective website
- collecting anonymous statistical information on things such as how many visitors our sites receive, how those visitors use the sites and where they came from.

Most of our online resources use sessions and/or cookies. If you wish, you can configure your browser so it does not accept cookies, but this may affect the functionality of the website.

##### **Collecting personal information from third parties**

Where possible, we collect personal information directly from you. However, in some circumstances we may also collect personal information about you, or about other people noted on the policy (if applicable), from other sources so that we can provide you with a more personalised service, issue a policy or assess a claim you make.

For example:

- you may apply for a product through an intermediary, business partner or other distributor; or
- we collect information required to assist us in determining the acceptability of a policy, the price of a

policy, or to investigate, assess and pay claims, which may be collected from third parties such as other insurers and/or veterinary service providers, or

- To provide you with an indicative quote for additional products that we offer.

As mentioned, we may receive sensitive information from a veterinary service provider during the claim process.

If we receive information about you from a third party and it is not information we need in respect of the services we provide, we will destroy or de-identify that information (provided it is lawful to do so).

## 5. Dealing with us anonymously or using a pseudonym

Where possible, you have the option of interacting with us anonymously or pseudonymously. Whilst you are entitled to interact with us anonymously or by using a pseudonym, we will need to know who you are in order to provide you with our products and services.

## 6. Use of information

We use your personal information in accordance with the Australian Privacy Principles. We use the personal information collected for a number of purposes, including:

- assessing your policy application (including to make a customer eligibility assessment for the policy), establishing and administering your policy (including preparing reports that we disclose to ING);
- processing premiums and payments;
- improving the way we provide our products and services;
- producing policy schedules and other mail related services;
- assessing, processing and investigating any insurance risks, claims or complaints, including your claims history;
- assessing risks and underwriting insurance;
- training our employees, agents, representatives; and
- conducting checks to help us comply with our regulatory obligations and manage our regulatory risks.

### Marketing

From time to time, we or ING may use the information collected from you to let you know via mail, SMS, email, telephone or online about any news, special offers, products and services. Neither we nor ING will ever sell or disclose your personal information to other companies, however, we or ING may provide your personal information to our business partners so that they can provide you with information about their products and services that you might be interested in (where you have agreed). Should you purchase products or services on our business partner websites, their privacy policy will apply to those products and services.

### Direct Marketing Opt Out

If you do not want to receive any marketing offers, you can choose to opt out of our marketing activities. To opt out, you can either:

- use the unsubscribe function from our emails, SMS, MMS or IM; or
- contact us using the Contact Details below.

You can, however, change your mind about opting out of receiving information about our products and services at any time by contacting us using our Contact Details noted below.

### Display Advertising

You can block interest-based advertising in your current browser by visiting the Digital Advertising Alliance's consumer choice tool at <http://optout.aboutads.info/> . If you are on your mobile device, enable the "Limit Ad Tracking" setting in your iOS phone's settings, or the setting to "Opt out of Ads Personalization" (or "Opt out of Interest-based Advertising" for older systems) in your Android phone's settings.

## **7. Disclosure to other parties**

The personal information that we collect from you may be disclosed to other parties who are involved with the provision of our products and services to you. Such parties include ING your insurer, any insurance intermediary involved in the transaction, your vet or veterinary practice, service providers such as claims assessors, investigators or lawyers (should they be required in the event of a claim) other insurers (for the purpose of seeking claims recoveries or to assist them to assess insurance risks) and our marketing partners.

If ING ceases to act as an Authorised Representative of AGIC, ING may also disclose the personal information that it, or AGIC has collected from you, to third parties including other insurance brokers and/or insurance companies, so as to offer or supply you with insurance, unless you tell ING otherwise.

If PHIS ceases to act as an Authorised Representative of AGIC, PHIS may also disclose the personal information that it or AGIC has collected from you, to third parties including other insurance brokers and/or insurance companies, so as to offer or supply you with insurance, unless you tell PHIS otherwise.

The information we provide to third parties will be strictly limited to what is required to provide the products and services, where disclosure is required, or authorised by or under law (for example, we may disclose information to government agencies) or where you have requested us to or have consented to the disclosure to a third party. The third parties may include overseas organisations (see below).

Subject always to our obligations under the Privacy Act, where we disclose personal information for other people noted on the policy, for a permitted purpose, to you or another third party you will ensure that they have consented to that use or disclosure.

### **Exchange of information with overseas parties**

Some of the parties with which we exchange your personal information, including our service providers and other third parties referenced above, may be located outside Australia in countries including Philippines, Singapore, Slovakia, Netherlands, South Africa, Japan, Republic of Ireland, United Kingdom and the United States of America. Where we do this, we make sure that such organisations have the appropriate data handling and security arrangements in place.

## **8. Access to and accuracy of personal information**

You can request access to the personal information the parties hold about you at any time by using the Contact Details noted below and we will provide you with that information unless we are prevented by law from giving you that access. If we are unable to provide you with the requested information, we will provide you with a written explanation.

Where access is granted to your information, we may charge a reasonable fee for such access and if we do, we will advise you of the fee prior to proceeding with the request.

We take reasonable measures to ensure that the personal information we hold about you is accurate and up to date. Under the Privacy Act, you also have a right to request that we correct information, if you believe your personal information is not accurate and up to date, we would encourage you to inform us by contacting us using the Contact Details noted below. We will promptly update any information that is incorrect and confirm to you when we have done so.

## **9. How we store personal information**

We will store your personal information in a number of ways including:

- in electronic systems and devices;
- in telephone recordings;
- in paper files;
- secure document retention services off-site; and/or
- cloud facilities operated by us (or by third parties on our behalf)

## **10. Information security**

We will take reasonable precautions to ensure that the personal information that we have about you is

protected against any unlawful use, unauthorised access, modification or disclosure and these precautions include:

- using appropriate information technology and processes;
- using computer and network security systems with appropriate firewalls, encryption technology and passwords for the protection of electronic files;
- securely destroying or "de-identifying" personal information if we no longer require it subject to our legal obligations to keep some information for certain prescribed periods;
- restricting access to your personal information to our employees and those who perform services for us who need your personal information to do what we have engaged them to do; and
- requesting certain personal information from you when you wish to discuss any issues relating to the products and services we provide to you.

While we undertake reasonable steps to protect your personal information, no guarantee can be given that information sent over the internet is always 100% secure. Sending and receiving information over the internet is at the user's own risk, however we will take all reasonable steps to ensure your data security once we receive it.

## 11. Website links

ING has linked its website to PHIS' and AGIC's website for the purposes of offering you certain insurance products. When using ING's website, you will be subject to the terms of ING's Privacy Policy.

Neither ING, PHIS, nor AGIC has control over the content on other websites that are accessible from a link on their websites, and they take no responsibility for the conduct of those third party companies.

Always read the privacy and security statements when using other websites.

## 12. Privacy Concerns

We are committed to resolving any concerns or complaints you may have, please contact us at any time by contacting us using the Contact Details noted below.

Our representative will be in contact with you regarding your concern or complaint and will let you know who will be assisting you, their contact details and the expected resolution date of your issue within 24 hours or as soon as practicable.

If the issues raised are more complicated, we may ask you for additional documentation to help resolve the issues. In turn, we will keep you updated on the progress of your complaint.

We will try to answer any questions you may have, correct any error on our part or resolve any complaint or concern that you may have about our information handling practices. If we do not resolve a complaint to your satisfaction, you also have the right to complain to the Office of the Australian Information Commissioner (OAIC) using the Contact Details noted below.

## 13. Contact details

<b>PHIS Privacy Officer</b> <a href="mailto:privacyquery@pethealthinsuranceservices.com.au">privacyquery@pethealthinsuranceservices.com.au</a> Privacy Officer Pet Health Insurance Services Pty Ltd PO Box 342 TOOWONG QLD 4066	<b>Australian Information Commissioner</b> <a href="mailto:enquiries@oaic.gov.au">enquiries@oaic.gov.au</a> <a href="http://www.oaic.gov.au">www.oaic.gov.au</a> Ph: 1300 363 992 GPO Box 5218 Sydney NSW 2001
---	---